



Windfarm committee report

Development proposed:

Balnespick Wind Farm – application under Section 36 of the Electricity Act 1989 for the construction and operation of a windfarm and energy storage facility within the Planning Authority of the Highlands Council, of 9 turbines with a tip height up to 200m. Anticipated generating capacity is 64.8MW with additional 10MW of battery storage making the total anticipated capacity 74.8MW.

Consultation from:

Scottish Government Energy Consents Unit

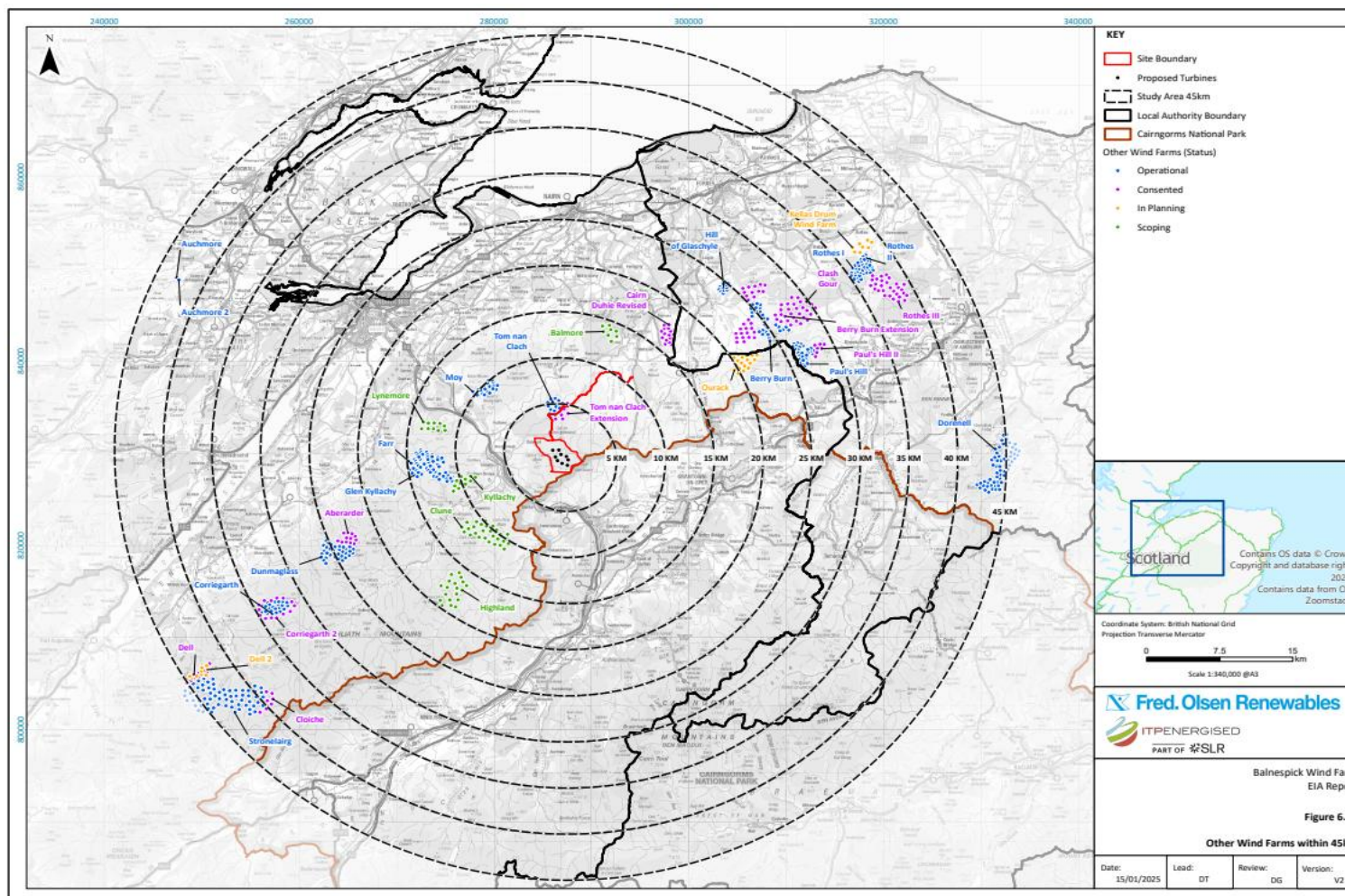
Reference: 2025/0040/PAC (ECU ref. ECU00004904)

Applicant: Fred. Olsen Renewables

Date consulted: 20 February 2025

Recommendation: Object

Case officer: Emma Bryce, Planning Manager (Development Management)



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Purpose of report

1. The purpose of this report is to inform the committee decision and subsequent consultation response to the Scottish Government Energy Consents Unit (ECU) on an application submitted under Section 36 of the Electricity Act 1989 for a proposed windfarm located to the northwest of the Cairngorms National Park. The Scottish Government are the determining authority for this application as the output is more than 50MW. The application is accompanied by an Environmental Report (EIAR), which presents the findings of the applicant's Environmental Impact Assessment (EIA).
2. The planning issues to be considered are confined to the effects of the proposed windfarm on the landscape character and Special Landscape Qualities (SLQs) of the National Park. All other matters, such as ecology, noise, general amenity, etc, are assessed by the decision maker (Scottish Ministers) with advice from statutory consultees.
3. Under the current working agreement on roles in landscape casework between NatureScot and the Cairngorms National Park Authority, NatureScot lead on the provision of advice on the effects on the SLQs caused by proposals outwith the Cairngorms National Park. Their advice has been used to inform this report.

Site description and proposed development

4. The windfarm will be located on the Strathtearn Hills which is an elevated moorland that provides a backdrop from key slopes and summits from within the National Park. The site covers an area of approximately 1,063 hectares. There are two prominent hill features separated by the Allt Loisgte watercourse. The site lies immediately adjacent to the National Park with the redline boundary adjoining the Park boundary to the south, approximately 5km east of Tomatin and 6km northwest of Carrbridge, with the Cairngorms National Scenic Area (NSA) lying approximately 14km to the south. The nearest turbine would be approximately 0.6km from the Park boundary, with the other turbines, tracks and associated infrastructure located further away from the boundary.
5. The proposed development would comprise 9 turbines with a maximum height of 200m to the tip of the blade in an upright position and a rotor diameter of 162m.



The associated infrastructure includes a site access, access tracks, crane hardstandings, underground cabling, on-site substation and maintenance building, energy storage facility, external transformers, temporary construction compounds, laydown area, batching plant and potential excavations / borrow workings. It is expected that the proposed windfarm would have an estimated total installed capacity of 74.8MW.

6. Theoretical visibility of the proposed windfarm from within the National Park is shown by the applicant's EIAR Figure 6.2 (**Appendix 1**). When considering cumulative visual effects, the applicant's Figure 6.2.8 Cumulative – ZTV (**Appendix 2**) demonstrates the visibility of the proposed windfarm and the operational windfarms located to the northwest of the Park boundary (Tom nan Clach, Moy, Farr and Glen Kyllachy windfarms). The blue areas show the increase in visibility of wind turbines with the introduction of the Balnespick Wind Farm and the green areas cumulatively with these existing windfarms.
7. Visualisations from 14 viewpoints were provided in the applicant's EIAR to demonstrate the predicted level of visibility that would be had from within / on the boundary of the National Park – refer to **Appendix 1** (Figure 6.2 Blade Tip ZTV to 45km with Viewpoints) for the locations:
 - VP1: Charn Glas-Choire
 - VP5: Creag Ealraich
 - VP6: Beinn Mhor
 - VP7: Carrbridge/Droichaid Charr
 - VP8: Nethy Bridge
 - VP9: Auchgourish
 - VP10: Carn nam Bain-tighearna
 - VP16: Cairngorm
 - VP18: Carn Sleamhuinn
 - VP19: Carn Sleamhuinn NE Slopes
 - VP21: B9007
 - VP22: Meall a' Bhuachaille
 - VP23: Cromdale Hills
 - VP24: Craiggowrie



8. **Committee members should familiarise themselves with the above visualisations online before the meeting.** The visualisations associated with each view point are available to the public by searching the application documents on the [Energy Consents Unit website](#) for the relevant figures within the EIAR - Volume 3b, Figures 6.36 to Figure 6.59.

Relevant planning history

9. November 2022 – the Park Authority responded to a pre-application consultation from the Highland Council.
10. August 2023 – the Park Authority responded to a scoping consultation from ECU for the current application.

Planning policy context

11. The proposed development is located wholly outwith the National Park and therefore the Cairngorms National Park Local Development Plan policies do not apply. However, an assessment of the proposal must be made in accordance with National Planning Framework 4 (NPF4) and have regard to the National Park Partnership Plan (NPPP).

National policy

12. **National Planning Framework 4 (NPF4)** sets out national planning policies that reflect Scottish Ministers' priorities for the development and use of land, as well as for operation of the planning system. It also identifies a series of 'national developments'. The content of NPF4 forms the national element of the statutory development plan, which also includes the relevant Local Development Plan. Decisions on planning applications (and Section 36 applications) are to be made in accordance with the development plan, and as such NPF4.
13. Policy specifically relating to National Parks and development management can be found in NPF4 Policy 4: Natural Places and Policy 11: Energy. In general terms, Policy 4 a) cites that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.



14. NPF4 Policy 4 c) specifically applies to a National Park and states that “development proposals that will affect a National Park... will only be supported where:
 - i. The objectives of designation and the overall integrity of the area will not be compromised; or
 - ii. Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.”
15. NPF4 Policy 4 c) clarifies that the policy test applies where development proposals may affect a nationally designated landscape and so can be applied to development proposals outwith the National Park boundary but potentially affecting it. Of relevance to the generation of wind energy development nationally, and therefore to the proposed development:
16. NPF4 National Development 3 ‘Strategic Renewable Electricity Generation and Transmission Infrastructure’ confirms that this class of national development supports renewable electricity generation, repowering and expansion of the electricity grid. It incorporates three types of development, including on and offshore electricity generation, including electricity storage, from renewables exceeding 50 megawatts capacity. The Balnespick Wind Farm proposal falls within the scope of National Development 3.
17. NPF4 Policy 11: Energy further clarifies that: “b) Development proposals for wind farms in National Parks... will not be supported; and d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4”.

Strategic policy

18. **The Cairngorms National Park Partnership Plan (NPPP) 2022 – 2027** is required under section 11 of the National Parks (Scotland) Act 2000. It is the management plan for the Cairngorms National Park approved by Scottish Ministers. The NPPP sets out how all those with a responsibility for the National Park will coordinate their work to tackle the most important issues. There is a duty for decision makers



to have regard to the NPPP, a requirement set out in Section 14 of the Act. As such, the NPPP is a material consideration in planning decisions.

19. The NPPP identifies that the landscapes of the National Park are valued by many and underpin the area's economy. It contains policies to safeguard landscape interests. Of relevance to windfarm development proposals are policies A4 and C2 a).
20. Policy A4 seeks to conserve and enhance the SLQs of the National Park. Policy C2 a) seeks to support development of a low carbon economy and increase renewable energy generation where this is compatible with conserving the SLQs. In relation to windfarm development, the policy states that "large scale wind turbines are not compatible with the landscape character or special landscape qualities of the National Park. They are inappropriate within the National Park or in areas outside the National Park where they adversely affect its landscape character or special landscape qualities".

Consultations

NatureScot advice

21. In accordance with the NatureScot / Cairngorms National Park Authority casework agreement, NatureScot have provided the Park Authority with advice in relation to the effects on the National Park of the proposed windfarm, both alone and cumulatively with other existing and consented windfarms in the surrounding area – see **Appendix 3**. This advice focusses on the effects of the proposed windfarm on the SLQs of the Cairngorms National Park.
22. The windfarm would be sited in the Strathdearn Hills just beyond the northern edge of the Cairngorms National Park. These are a pronounced line of hills lying to the east of the A9, extending to approximately 650m AOD which rise to an undulating plateau. In terms of the baseline conditions, operational windfarms that lie along the northwestern edge of the Park (Glen Kyllachy, Farr, Moy and Tom nan Clach) are visible from some elevated areas. However, these do not significantly affect the SLQs given the lesser height (all below 125m to blade tip), screening from existing landforms and greater distance from the Park. From higher elevations



within the Park, these operational windfarms are perceived as distant features again due to turbine height and greater distance from the Park. From the majority of lower elevations, no operational windfarms are currently visible.

23. The turbines in the proposed location would be visible across large areas of lower lying parts of Strathspey, the Dulnain Strath, Abernethy and Rothiemurchus, and from elevated points including the Cromdale Hills, Strathdearn Hills, the Craiggowrie – Meall a' Bhuachaille ridge, the Monadhliath and key summits and north-west facing slopes of the Cairngorms central massif – refer to **Appendix 1**. It is considered that the turbine height and proximity of the proposed development to the Park would represent a substantial shift in windfarm development baseline around the northwestern edge of the Cairngorms National Park.
24. NatureScot advise that there would be a significant adverse effect on five SLQs during the day and associated lighting would extend these effects after dark. The SLQs affected, in order of relevance are as follows:
- SLQ6 – Landscapes both cultural and natural
 - SLQ10 – The surrounding hills
 - SLQ30 – Grand panoramas and framed views
 - SLQ32 – Dark skies
 - SLQ28 – Wildness
25. SLQ6 – Landscapes both cultural and natural and SLQ10 – The surrounding hills, are considered together given their similar characteristics relating to upland moorland hill and their perceived wildness. Following assessment of the development on these SLQs, NatureScot conclude the proposed turbines would introduce incongruous structures to the bare, uninhabited uplands, representing a substantial change to the distinct pattern of development and eroding the distinction between cultural (settled strath) and natural (moorland hills) landscapes from both elevated and lower lying areas of Strathspey. The proposal would diminish the sense that surrounding hills are '*under the dominion of nature*' and reduce the contribution of the Strathdearn Hills to the '*wild, untamed appearance of the area*'. The adverse effects on these SLQs are considered to be significant.



26. SLQ 30 – Grand panoramas and framed views relates to a range of views *‘from broad pastoral straths of green, over rolling hills of brown heather moor, with woodland at lower levels: and far, distant exposed mountain terrain’*. NatureScot conclude there would be significant adverse effects on this SLQ as appreciated from a number of locations, routes and summits within the Cairngorm massif, due to the proposal’s vertical scale, proximity, and location within key framed views.
27. SLQ 32 – Dark Skies notes *‘at night, even the complete absence of colour, a pitch black sky bespeckled only with the light of stars, is a distinctive feature as dark skies become increasingly rare in Britain’*. The proposed turbine lighting would add a new layer of obvious bright red lights to uplands, incongruous with the current development pattern of lighting contained to the straths and eroding the characteristics of the SLQ. It is concluded there would be significant adverse effects on this SLQ across both upland and lower lying areas of the National Park.
28. SLQ 28 – Wildness notes that *‘Other areas of the Park are less remote, but the preponderance of near natural vegetation, together with distinctive wildlife and the general lack of development, can still give a perception of the dominance of nature. This includes the managed grouse moors, and the ancient, managed woods and plantations’*. The proposal would result in a substantial shift in the proximity, prominence and visual intrusion of windfarm development, introducing prominent modern structures in the immediate landscape, and in panoramic views, in particular from the Strathearn Hills, having a significant adverse effect on this SLQ. Aviation lighting would draw attention to the structures which would otherwise not be visible after dusk reducing the sense of risk and tranquillity. There would therefore be significant daytime and night-time effects on the Wildness SLQ from the Strathearn.
29. Consideration has been given to the cumulative effect the proposal has with the current application for the adjacent Clune Wind Farm (on the agenda for this planning committee as item 11). There is also a current application for the Highland Wind Farm (on the agenda for this planning committee as item 12), although this has not been considered in cumulative effects as NatureScot had not completed their appraisal of this windfarm on its own at the time of this appraisal. Clune Wind Farm would comprise 26 turbines (200m to blade tip) on the northeastern



Monadhliath (0.9km from the Park boundary). Balnespick would be located 9.5km northeast of Clune. The introduction of these windfarms would intensify the presence and influence of windfarm development in close proximity to the National Park. Balnespick would introduce a vertical man-made focal point to the northern, simple ridgeline and when viewed along with Clune on the western skyline would intensify the erosion of contrast between the settled strath and uninhabited upland of the surrounding hills. The addition of Balnespick Wind Farm would intensify significant adverse effects found on SLQs 6, 10, 30 and 32 as a result of the Clune Wind Farm.

Appraisal

30. The policies of NPF4 and the NPPP set out how proposals outwith the boundary of the National Park should be considered in terms of effects on the National Park.
31. NPF4 Policy 11: Energy clarifies that “b) Development proposals for wind farms in National Parks... will not be supported; and d) Development proposals that impact on international or national designations will be assessed in relation to Policy 4”.
32. NPF4 Policy 4 a) cites that development proposals which by virtue of type, location or scale will have an unacceptable impact on the natural environment, will not be supported.
33. Policy C2 a) of the NPPP sets out a test for considering effects on the landscapes of the National Park, in that large scale wind turbines are inappropriate outside the National Park where they ‘adversely affect its landscape character or special landscape qualities’. If a proposal fails policy C2 a), it would also be in conflict with NPPP policy A4 which seeks to conserve and enhance the SLQs of the National Park.
34. The proposed windfarm is located within the Strathdearn Hills, on an elevated ridge in close proximity to the National Park boundary. It would introduce visibility of turbines to lower lying areas of the National Park for the first time. The proposal both individually and cumulatively with the proposed Clune Wind Farm, would affect five of the SLQs of the Cairngorms National Park during the day and associated lighting would extend these effects after dark. These impacts would



result in evident and noticeable material changes to these SLQs such that the objectives of the designation and overall integrity would be compromised.

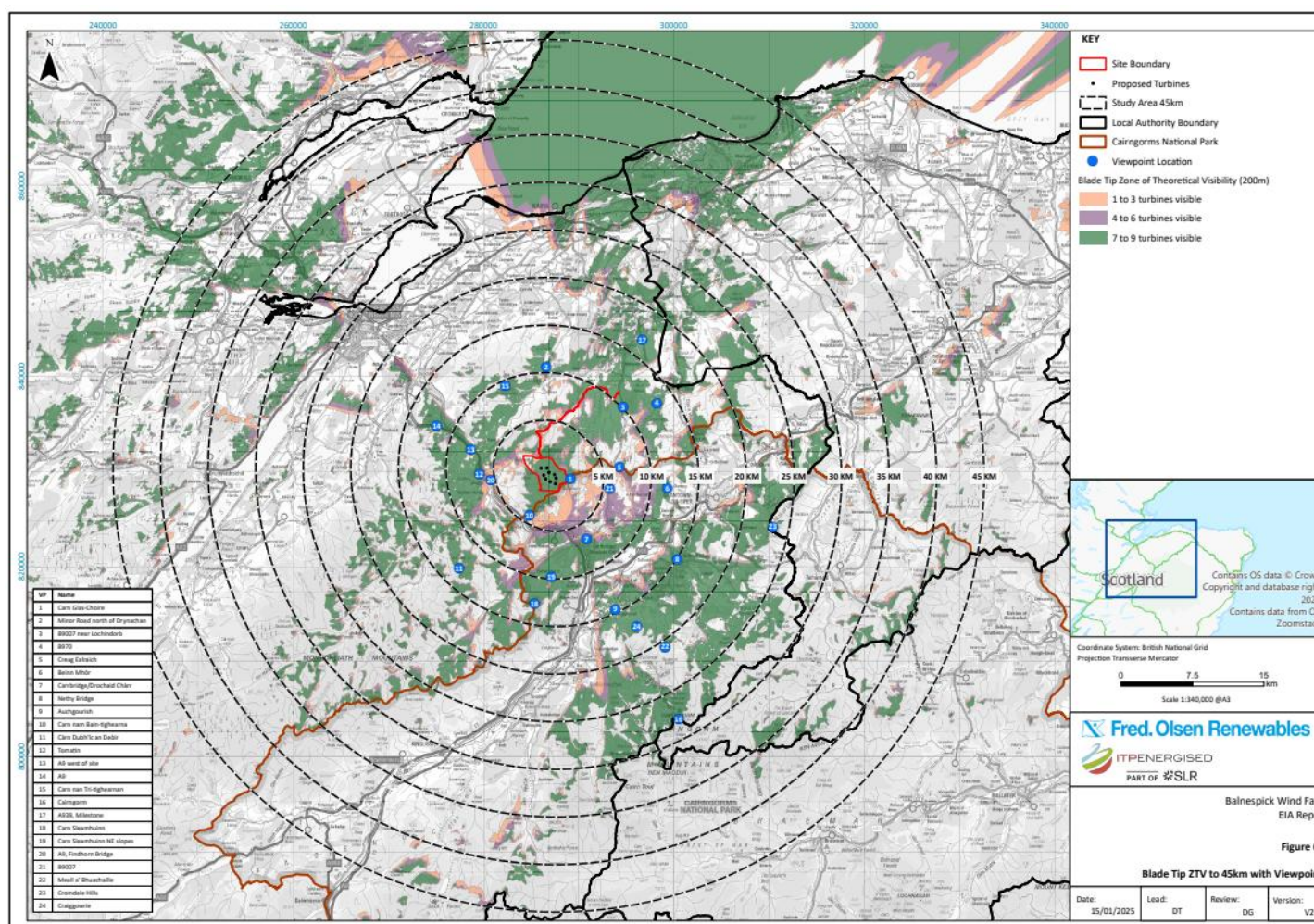
35. The nature, extent and level of significant adverse effects caused by the addition of Balnespick Wind Farm to the baseline of operational and consented wind farms is therefore considered to fail to meet the requirements of NPPP policies C2 a) and A4, and in turn NPF4 Policies 4 and 11. It is therefore recommended that the National Park Authority should **object** to the proposed Balnespick Wind Farm.

Recommendation

That members of the committee confirm that Cairngorms National Park Authority OBJECT to the application for the proposed Balnespick Wind Farm.



Appendix 1 – Balnespick Wind Farm: Proposed windfarm ZTV





Appendix 2 - Balnespick Wind Farm: Cumulative ZTV with operational Tom Na Clach, Moy, Farr and Glen Kyllachy windfarms

