

# Stronelaig Wind Farm: CNPA Landscape Comment

## 1.0 The Development

The Stronelaig windfarm is a proposal for 83 wind turbines the majority of which are 135m in height. The site is in the Monadhliath south west of the National Park. At its closest point the wind farm is 1.5km from the Park boundary. As no part of the development as proposed would be constructed within the National Park all effects as described are indirect in nature.

## 2.0 The Cairngorms National Park

### 2.1 Zone of Theoretical Visibility (ZTV)

The ZTV demonstrates that the main areas affected are high level summits and ridges along the south western boundary, the southern hills and the central plateau with some limited small areas of visibility at lower elevations.

### 2.2 Landscape and Visual Impacts

Sensitivity to the type of change proposed is considered in the ES to be high and magnitude generally low, with a high magnitude along the western boundary. The resultant landscape and visual impact on the CNP is considered to be slight adverse (and not significant) with impacts along the western boundary being locally substantial adverse.

I agree that the landscape and visual impacts, and cumulative landscape and visual effects along the south western boundary are substantial and adverse, and that for many other locations in the Park with visibility of the proposed wind farm, the landscape and visual impacts are likely to be slight and adverse (My assessment of effects on different parts of the CNP is explained in more detail below). However, whilst the extent over which an impact can be experienced is a relevant qualification, it is not the case that a widespread lower level of effect can cancel out a concentrated high level of effect and so arrive at the conclusion of the ES that “the resultant impact on the CNP as a whole ... is considered to be slight adverse and therefore not significant.”

**As a consequence of the size and location of this project, the landscape and visual impacts along the south western edge of the Park would be significant and adverse, and in some locations overwhelming. The Stronelaig wind farm as proposed would adversely affect the landscape setting of the NP and fail to meet policy 1.3 of the NPPP.**

## 2.3 Wildness and other Special Qualities

The special landscape qualities of this part of the National Park arise from the simple character of this landscape and its relative featurelessness. The vast open spaces of the high moorland and extensive tracts of semi-natural vegetation create subtle patterns, broken occasionally by rocky features and incised rivers and burns. The extensive and rugged nature of the terrain, the difficulties of access and the lack of human artefacts mean that this area, both that within the Park and beyond, has high, and sought-after, qualities of wildness. The introduction of the Stronelaig wind farm, a varying arrangement of large, vertical industrial scale, moving structures and a network of tracks, would be in direct contrast to, and have a significant impact on, the key characteristics of this landscape and specifically on those that are valued as special qualities. The ES indeed concludes that the impacts on landscape character in these areas would be significant and adverse.

However the ES also concludes that the overall impacts on the Monadhliath Search Area for Wild Land (which includes this part of the Park) would be slight adverse and not significant. I strongly contend that the impacts of this development on the sense of wildness within the National Park in the vicinity of the proposed windfarm (see para 3.1.4 above) would not be slight and adverse but rather significant and adverse. **The net result would be a loss in the quality and extent of wildness that can be experienced in the National Park and a failure to meet Policy 2.3 of the NPPP.**

## 2.4 Cumulative Effects on the CNP

The landscape and visual effects of Stronelaig on the Monadhliaths are assessed as significant. This level of significance is both in addition to those windfarms already in the landscape now, and those consented and proposed.

These landscape and visual effects will have a consequent effect on the experience and perception of the special qualities of this part of the Park and particularly on wildness.

This windfarm will extend the L&V effects of windfarms on the Park landscapes penetrating areas hitherto little or unaffected, the Southern Monadhliath, Ardverikie, Drumochter Hills, Giack, Dalnamein and Atholl forest with predicted visibility on Beinn a Ghlo. (fig 9.6)

This proposal would contribute further to the now marked encircling effect of wind farms around the NP, extending the effect into the south western extremities of the Park.

## 2.5 National Park Designation and the National Interest

There are 3 Long Term Outcomes identified in the NPPP designed to deliver the 4 aims of the National Park. The outcome 'A special place for people and nature with natural and

cultural heritage enhanced', identifies conserving and enhancing the distinct landscape character of the Park's landscapes, and the sense of wildness in particular, as being key to success. The NPPP in its 5 year outcomes and targets recognises that the special landscape qualities are integral to the delivery of economic and social outcomes as well as landscape conservation and enhancement.

The wind farm sits west of the ridge that forms the boundary to the National Park and this limits the extent of visibility throughout the Park. There is a low level of landscape and visual impact, and effects on special qualities, on the central massif and associated ridges.

However, in the south west of the Park the majority of the hills and ridges that form the boundary to the National Park are affected, with significant adverse landscape and visual impacts occurring from Stob Coire Dubh to Meall na Creughaich. The intensity of landscape and visual impact is very high, and where this would be experienced, coincides with an area that contains a number of Munros and Corbetts, and is within an area of Band A wildness.

This wind farm as proposed would have a significant adverse impact on the special landscape qualities along the south western edge of the National Park, and would result in a loss in the quality and extent of wildness that can be experienced in the National Park. **In so doing it would undermine the objective (NPPP outcome 2) to conserve and enhance the distinct landscape character of the Park's landscapes, and the sense of wildness in particular.**

## 3.0 Impacts Affecting Different Parts of the Park

In the following section I examine the material submitted in the ES Landscape and Visual section. The CNP will be affected to differing degrees, the following assessment and comment relates to different geographical areas of the Park.

In the applicant's assessment a moderate level of impact is considered significant.

### 3.1 Effects on The South West Boundary area of the CNP

#### 3.1.1 ZTV

The ZTV shows almost continuous visibility (of 1 to 83 turbines) along 18km to 20km of the CNP boundary and some nearby high points and ridges from Geal Charn Monadhliath to Meall na Creughaich)

The effects are demonstrated by viewpoints 13, 14 and 15 ( and to a lesser extent v. pt 12). There is a further area in the most western part of the Park in the Glen Shirra forest where there is visibility from Carn Dubh and Stob Coire dubh. The nature of visibility is likely to be similar to that for viewpoint 18 and at 9km from the nearest turbine I would judge that the visual impact is likely to be significant adverse (high sensitivity and medium magnitude). This area is in the centre of the Monadhliath SAWL.

#### 3.1.2 Effects on Landscape Character

| LCA – South Monadhliath Landscape Character Area of which part is within the Park |  |       |
|---|--|-------|
| sensitivity   | high   | agree |
| Magnitude of effect   | Locally high (in the area within CNP)  | agree |
| Impact  | <b>Locally substantial and moderate significant adverse impacts</b> on the summits and ridges and elevated slopes in the south west of this area due to relative close proximity and local prominence of development | agree |
| cumulative  | <b>Locally moderate and significant</b>  | agree |

### 3.1.3 Effects on Visual Amenity

| Viewpoint No.                                 | Viewpoint               | Distance from nearest turbine | Effect on Visual Amenity  | Cumulative effect                                     |
|---|-------------------------|-------------------------------|---|---|
| 12  | A' Chaillaich           | 10.8                          | Neutral (Disagree with sensitivity assessment of low*)                      | Not assessed  |
| 13<br>(measure up turbines at this viewpoint) | Carn Dearg Monadhliath  | 6.2                           | <b>Moderate and significant</b> (Disagree with medium level of magnitude**) | Moderate (disagree with medium level of magnitude***) |
| 14  | Unnamed hill            | 1.6                           | <b>Substantial and significant</b> (agree)                                  | Not assessed  |
| 15  | Geal Charn Moanadhliath | 2.7                           | <b>Substantial and significant</b> (agree)                                  | <b>Substantial</b> (agree)                            |

\*these viewpoints are all high or hill-top viewpoints within the National Park. The context is expansive with views of rolling foreground and distant hills and the mid-ground often lost. People are here to experience the long walk in, and the expansive summit experience. Sensitivity of visual receptors should be at least medium if not high.

\*\* The proximity, extent of area affected, contrast and backclothing would I believe lead to a high magnitude of effect.

\*\*\* The degree of change due to Stronelaairg in addition to other windfarms in the view would be high owing to its proximity and spread in front of other wind farms which are at much greater distances (on the other side of the Great Glen).

### 3.1.4 Special Qualities Including Wildness

No assessment of effects on the special qualities of this area of CNP has been made other than wildness. A wild land assessment has been undertaken for the South Monadhliath LCA (appendix 8.1 page 16). which is encompassed within the Monadhliath SAWL and the SAWL (8.8.59) The conclusion of this assessment is that the overall impacts on the Monadhliath SAWL (both from this windfarm alone and cumulatively 8.9.2) would be **slight adverse**. I would strongly disagree with this assessment as it pertains to that part of the SAWL that is within the NP. Apart from the Upper Glen of the Spey (LCA) very little of this area is influenced by the presence of development be it wind farms, transmission lines or estate tracks. The CNPA and SNH wildness mapping show the summits and ridges along the south western boundary area of the Park to have a very high degree of wildness, the experience of which would be profoundly affected by this proposal. This development would introduce a large number of turbines into views otherwise characterised by a lack of artefacts. It would

impact on the perceived naturalness, sense of sanctuary /solitude, sense of awe and the inspiring qualities of this extensive upland area. The impact on the special quality of wildness within this part of the CNP would be **substantial adverse**.

### **3.2 Effects on Cairngorm Massif including the NSA.**

#### **2.2.1 ZTV**

The ZTV shows visibility of 1 to 41 turbines on Braeriach (at 39.2km) and visibility of 1 to 20 turbines on the shoulders and summits from Mullach Clach a Blair to Sgoran Dubh Mor (at about 33km).

#### **2.2.2 Effects on Landscape Character**

No assessment of effects on landscape character made for this area

#### **2.2.3 Effects on Visual Amenity**

| Viewpoint No. | Viewpoint | Distance from nearest turbine | Effect on Visual Amenity | Cumulative effect |
|---------------|-----------|-------------------------------|--------------------------|-------------------|
| 16            | Breariach | 39.2km                        | Neutral (agree)          | Neutral (agree)   |

#### **2.2.4 SQs Including Wildness**

No assessment of effects on the special qualities has been undertaken in respect of this area. A wild land assessment has been undertaken for the SAWL of which Breariach is part. The conclusion of the ES assessment (page 8-38) is that the overall impacts on the Cairngorm and Atholl SAWL would be “unlikely to result in a reduction of the overall wild land quality of the area”.

#### **2.2.5 The Cairngorm Mountains NSA**

Though a very large wind farm, the distance of the proposal from locations with visibility within the NSA, is substantial. I agree with the assessment of high sensitivity, but taking the range of potential viewpoints (including the ridgeline east of Feshie) into consideration, I would predict a low magnitude of change (rather than negligible) and a slight adverse (rather than neutral) L&V impact which will have some effect on peoples experience of the special qualities of the Cairngorm Mountains NSA.

Wildness is arguably the most special quality that people can experience in the upland and mountainous parts of the NSA. The CNPA wildness SPG map shows a high level of wildness in this area. The introduction of this wind farm will contribute to a cumulative effect on the perceptual attributes of wildness. I would judge the magnitude of cumulative change

attributable to Stronelairg to be low, resulting in a slight adverse cumulative L&V impact. In EIA terms this would not be significant. This may have an adverse effect on the perceptual qualities wildness as experienced within the massif area but is unlikely to be significant.

The general objective of the NSA designation is to ensure the conservation of the landscape character and special qualities of the area. **This proposal would contribute to the cumulative effect that wind farms are having on the landscape character and on the special qualities of the Massif area in particular, but at distances of 33 to 39km the significance of the effect is slight and could not be said to undermine the objective.**

### **2.3 Effects on the Drumochter Hills and Beinn A' Ghlo**

ZTV – the ZTV shows visibility of 1 to 41 turbines on Meal Chuaich (22 blades visible) and across an area including Carn Na Caim and A' Buidheanach, and west of the A9 on A' Mharconaich, as well as from a scatter of locations including Beinn Dearg out to Beinn A' Ghlo. Following analysis of the ZTV I would judge the visibility and effects on the Carn Na Caim and A' Buidheanach area are likely to be similar to that demonstrated by viewpoint 20. The ZTV shows A' Mharconaich as having visibility of more turbines, similar to that for viewpoint 21. I would judge the impact would be likely to be medium and significant (high sensitivity and low magnitude).

Part of this area of ZTV visibility is within the Cairngorm and Athol hills SAWL.

#### **2.3.1 Effects on Landscape Character**

No assessment of effects on landscape character made for this area

#### **2.3.2 Effects on Visual Amenity**

| Viewpoint No. | Viewpoint     | Distance from nearest turbine | Effect on Visual Amenity   | Cumulative effect |
|---------------|---------------|-------------------------------|--|-------------------|
| 20            | Meal Chuaich  | 20.7km                        | disagree with assessment of medium sensitivity* but agree with slight **adverse impact | Not assessed      |
| 22            | Benin A' Glow | 50.1km                        | Neutral (agree)  | Not assessed      |

\* This viewpoint is a munro within the National park. The context is expansive with views to the north west across the receding layers of the Monadhliath. This is a popular Munro, easily accessed from the A9, sensitivity of visual receptors should be high.

\*\*turbines sit low in the landscape with only tips visible, content with assessment of magnitude being low.

### 2.3.3 Special Qualities Including Wildness

No assessment of effects on the special qualities of this area of CNP has been made. A wild land assessment has been undertaken for the SAWL of which this is part. The conclusion of the ES assessment (page 8-38) is that the overall impacts on the Cairngorm and Atholl SAWL would be “unlikely to result in a reduction of the overall wild land quality of the area”.

The CNPA wildness SPG map shows a high level of wildness in this area. The introduction of this wind farm is likely to have a low to negligible effect on the perceptual attributes of wildness (depending on location of viewer) in this part of the National Park and in my view result in a slight adverse impact.

## 2.4 Effects on the Ardverikie and Shirra areas

### 2.4.1 ZTV

The ZTV shows visibility of 1 to 20 turbines in the lower Ardverickie hills (Creag na Doire Duibhe and Meal nan Eagan some visibility from the path Dalwhinnie to Feagour Route R4) and the Black Wood (excluding Dun Da Lamh). Viewpoint number 19 shows 4 blade tips.

### 2.4.2 Effects on Landscape Character

| <b>Ardverikie hills</b> |  |          |
|-------------------------|--|----------|
| sensitivity             | medium   | Agree    |
| Magnitude of effect     | Negligible Locations with visibility in this part of the Park are lower than v. Pt 21 (which although outside the Park is the only viewpoint in this area)with fewer turbines visible but impossible to determine whether the change in the experience of landscape character would be ‘not discernible’ , ‘perceptible’ or ‘notable’ I would err on the side of caution and say a ‘low’ rather than negligible change | disagree |
| Impact                  | Neutral (should be a slight adverse level of impact on landscape character for reasons given above)  | Disagree |

|                     |                |       |
|---------------------|----------------|-------|
| cumulative          | Not assessed   |       |
| <b>Glen Shirra</b>  |                |       |
| sensitivity         | Medium         | agree |
| Magnitude of effect | Low            | agree |
| Impact              | Slight adverse | agree |
| Cumulative          | Not assessed   |       |

### 2.4.3 Effects on Visual Amenity

| Viewpoint No. | Viewpoint   | Distance from nearest turbine | Effect on Visual Amenity  | Cumulative effect |
|---------------|-------------|-------------------------------|---|-------------------|
| 19            | Glen Shirra | 11.3km                        | disagree with assessment of low sensitivity* disagree with negligible** magnitude and neutral impact. | Not assessed      |

\* this viewpoint is on a popular low-level through-route within the National park. The context is enclosed with views focused along the glen towards the Monadhliath. The sensitivity of visual receptors should be medium to high.

\*\*4 blade tips visible, though the degree of change is low they sit in a dip in the horizon, a natural visual focal point and in some conditions magnitude of effect will be higher than negligible. In my view the magnitude of change would be negligible to low and sensitivity medium to high leading to slight adverse visual (amenity) impact.

### 2.4.4 Special Qualities Including Wildness

No assessment of effects on the special qualities of this area of CNP has been made.

An assessment of Wildness has been undertaken for the Ardverickie hills LCA (Appendix 8.1 p6) The CNPA mapping of the higher parts of this area show it as having a medium level of wildness. I judge there to be a negligible/low magnitude of change and a slight adverse level of impact rather than neutral as assessed .

An assessment of Wildness has been undertaken for the Glen Shirra LCA (Appendix 8.1 p7). The CNPA mapping of this area shows it as having a low/medium (light green) level of wildness. I judge there to be a negligible to low magnitude of change to the wildness attributes (not neutral) leading to a neutral level of impact on wildness as assessed.

### 2.4.5 Dun Da Lamh

The Dun Da lamh fort is a site within the National Park with great cultural heritage value and where many of the special qualities of the Park can be experienced from a single location. The applicants assessed a view point from this location and conclude that there will be no visibility. I would advise that we seek reassurance and evidence that this is the case.

## **2.5 Effects on the North west of Park**

### **2.5.1 ZTV**

The ZTV shows visibility of 1 to 20 turbines on Geal Charn Mor on the boundary of the Park west of Aviemore. Viewpoint number 7 shows 1 blade tip visible

### **2.5.2 Effects on Landscape Character**

Not assessed

### **2.5.3 Effects on Visual Amenity**

| Viewpoint No. | Viewpoint      | Distance from nearest turbine | Effect on Visual Amenity  | Cumulative effect |
|---------------|----------------|-------------------------------|---|-------------------|
| 7             | Geal Charn Mor | 28.1km                        | Disagree with low level of sensitivity assigned should be high as is Corbett in NP. Magnitude negligible (agree as only 1 blade tip visible at considerable distance). Neutral impact on visual amenity (agree) | Not assessed      |

### **2.5.4 Special Qualities Including Wildness**

No assessment of effects on the special qualities of this area of CNP has been made.

## 4.0 Methodology and Visual Material

- There is minimal reference to Special Landscape Qualities and their relationship to landscape character and enjoyment.
- Wild land assessment is done on the basis of the SAWL and an assessment of the wildness attributes of the LCAs within the 15km study area, and not the National or CNPA relative wildness mapping which is based on an accepted and tried methodology.
- The photographic visualisations are poor, with photographs taken in conditions of poor contrast and smoke from muirburn, and the turbines not rendered clearly.
- ZTVs –I have assumed that all ZTVs are blade tip but cannot find confirmation in text or on visuals.
- Access tracks are not rendered (or poorly rendered) in to photomontages where they would be clearly visible.
- The scoping out of viewpoints from the assessment does not help in understanding a fuller picture.
- Whilst I have not challenged many of the viewpoint assessments I do find the assessment of sensitivity for both landscape character and viewpoints a little odd. In the case of LC, scenic quality is included separate from attached values. My reading of GLVIA is that it should be included in perceptual qualities/landscape value. Assessed in this way important key characteristics of a landscape, which may not be regarded as scenic will be down-played. In the case of the sensitivity of visual amenity receptors aspects of change have been included which would normally be included within the assessment of magnitude.
- The angle of view is given excessive weight in considering the nature and magnitude of change. Whether a view is ‘front on’ or ‘opposite/oblique to the main focus of the view’ is surely dependent upon the viewer, especially at hill-top viewpoints.