

CNPA 4

**THE ELECTRICITY ACT 1989
THE PLANNING ETC (SCOTLAND) ACT 2006
Town and Country Planning (Appeals) (Scotland) Regulations 2008**

INQUIRY INTO AN APPLICATION UNDER SECTION 36 OF THE ELECTRICITY ACT

DORENELL WIND FARM

NEAR DUFFTOWN, MORAY

***LANDSCAPE AND VISUAL IMPACTS
ON THE CAIRNGORMS NATIONAL PARK***

TOPIC PAPER CNPA 4

**CONSIDERATION OF 'WILDNESS' IN ASSESSING
THE IMPACTS OF THE DORENELL WIND FARM ON
THE CAIRNGORMS NATIONAL PARK AND ITS
SETTING**

Introduction

- 4.1 'Wildness' in this context, is defined in dictionaries as a natural state or remote, uncultivated or uninhabited region. Unlike 'wilderness' which sometimes has negative connotations, 'wildness' is seen as a positive quality in this context.
- 4.2 Wildness is not the same thing as wild land. Though the two are obviously related, a distinction is drawn between them. SNH's policy paper (**CNPA 11** para 2) explains that wildness is the quality enjoyed, whereas wild land or wild places are where wildness is best expressed. **CD Q 14** (page 21) emphasises that there are parts of the National Park, which strongly exhibit wildness and are less remote than the central massif, which, as wild land, contains some of the wildest and remotest areas in Britain. The preponderance of near natural vegetation, together with the distinctive wildlife and the general lack of development, can still give a perception of the dominance of nature, and lend wildness to areas such as the managed grouse moors. Consequently, the Park Authority has concentrated more on understanding, and seeking to protect, wildness, rather than defined areas of wild land per se.
- 4.3 In the Scottish Executive's Scoping Opinion for Dorenell (**CD H 1**) the Scottish Government noted that the location was not in a SNH 'Area of Search for Wild Land', but nevertheless, the area was likely to have such characteristics. This is an important indication that areas of search for wild land are not inclusive of all areas in Scotland which may exhibit wildness, and that the Government recognised that the wildness of the application site was an important matter to be addressed.

Perception of Wildness in the National Park

- 4.4 Wildness is widely recognised and understood and highly valued by people. It is actively sought after by many people. In a recent, structured and bespoke survey (**CNPA 9**), 91% of residents in Scotland, and 96% of those living in the Cairngorms, think it is important to have wild places. Wild places are perceived as important for a wide range of reasons, most commonly because they are part of Scotland's culture and heritage and for tourism; but also for the benefits to wildlife, the environment, and the local economy, and to people's health and well-being. About half the population think that wild places are under threat and three in five think that action is required to preserve wild areas. Especially amongst Cairngorms National Park residents, the action required to protect wildness includes more control for masts, wind turbines and vehicle tracks, which are considered to decrease wildness most significantly.

- 4.5 Wildness is an important landscape characteristic (see paragraph 2.2 of CNPA 2). It arises in part, from the coming together of other landscape characteristics, including certain types of land cover and land use, a lack of recent human artefacts, relative inaccessibility and remoteness, and a general lack of human activity, in a landscape dominated by nature. The survey in **CNPA 9** indicates that people consider that factors relating to what may generally be termed 'naturalness' (including land cover and wildlife) are those characteristics that most make an area wild (section 3.2.1). But wildness is more than the sum of these component characteristics; the experience of wildness derives also from an engagement with the physical world, solitude or sanctuary, closeness to nature and wildness in its own right (para 4 **CNPA 11**). These are all exhibited strongly in many parts of the Cairngorms National Park.
- 4.6 When looking at images of places (**CNPA 9**), 76% – 81% of Scottish and Cairngorms National Park residents respectively, ranked dramatic, rugged mountains as very wild; but notably in the context of this application, 62% – 65% of respondents ranked moorland as very wild, and 91% – 99% as either very wild or quite wild; and these percentages barely changed for an image of moorland with a ruined building (61% – 63% and 92% - 93% respectively) (section 3.2.3).
- 4.7 Wildness is what landscape practitioners use as one of the defining characteristics of landscape character types when undertaking landscape character assessment (see paragraphs 2.3 – 2.6 of CNPA 2). It is therefore a well established landscape characteristic in its own right and capable of influencing the classification of landscape character types.
- 4.8 Section 3.2.5.7 of **CNPA 9** indicates that the majority (73%) of Cairngorms National Park residents consider that wind turbines decrease wildness, 45% saying that they would do so significantly. Wind farms are seen as the fourth greatest threat to wild areas in the National Park, after the effects of housing / buildings / construction / development / urbanisation and people (section 3.6.3). This survey clearly demonstrates that wildness is especially valued by National Park residents. Whilst wind farms may be viewed as a neutral issue elsewhere, with a broadly even split between those who see wind farms as positive change and those who see them as negative change, that is not the case in the Cairngorms, where they are seen as a very negative impact on the Park.

- 4.9 In 2010 the Cairngorms National Park Authority undertook a repeat visitor survey (CNPA 14). This demonstrates that 'wildness' is important to visitors as well as to those who live in the Park. The main statement, which the largest percentage of people interviewed indicated to represent their view of the Cairngorms National Park before their visit, was "A tranquil, unspoilt wilderness area, where conservation is the key aim" (see summary at page 14).

National Park Study of Wildness

- 4.10 Aspects of wildness were defined and mapped in the National Park during 2008, in a specially commissioned study (CNPA 7). This was a GIS based study to explore the spatial distribution and qualities of wildness in the National Park. It defined four principal attributes which directly or indirectly (as a surrogate) represented aspects of wildness that could be mapped from pre-existing data. They were: perceived naturalness of land cover; absence of modern human artefacts; rugged and challenging nature of the terrain; and remoteness.
- 4.11 Importantly it should be noted that the ratings on the maps are not absolute, but specific to the Cairngorms National Park, not Scotland as a whole. For direct comparison scores from other study areas would need to be calibrated, so that the same scale would be used to compare the other area with the National Park. Consequently, even areas that score relatively low in the National Park might be relatively high when compared with, for example, more highly managed lowland agricultural landscapes outwith the Park. In addition to the central massif of the Cairngorms, it is to be noted that the Ladder Hills score highly even in the Cairngorms context.

The SNH Study

- 4.12 The Cairngorms study does not seek to replicate or advance the SNH initiative of identifying Areas of Search for Wild Land. The SNH initiative was a different exercise with a different context. It was strategic at a national scale and very broad brush; it did not examine all areas systematically in order to identify every area that fell into the definition of 'wild land', but sought to map those areas where such a characteristic was most likely to be found. It does not purport to be inclusive of all areas of wild land and it does not exclude the prospect of wildness being a characteristic of other areas.

The Ladder Hills and Hills of Cromdale

- 4.13 As noted above, in the CNPA 2008 study (**CNPA 7**) the Ladder Hills are consistently mapped as having a higher level of wildness overall, and in respect of each attribute, even though they were not identified as an Area of Search for Wild Land. There can be no question but that the Ladder Hills, and to a lesser extent the Hills of Cromdale, exhibit high levels of wildness and that wildness is a key and defining characteristic of these areas, even in a Cairngorms rather than national context.
- 4.14 These areas of wildness go to the boundary of the National Park and clearly extend beyond the boundary. The application site equally exhibits the characteristics of wildness, in a continuum of the landscape from within the National Park (see CNPA 3 and 5). The photographs at viewpoints 11 and 11a, and a site visit, conclusively demonstrate the wildness of the Ladder Hills and the Blackwater Forest.
- 4.15 Furthermore, the Ladder Hills are a separate and distinct area of wildness importantly located away from the central Cairngorm massif.
- 4.16 The characteristic of wildness in the Ladder Hills within and outwith the National Park, would be destroyed by the construction of the 59 turbines and tracks of the Dorenell wind farm. That would fundamentally change the landscape character type of the Ladder Hills and the Blackwater Forest (see paragraph 3.27 of CNPA 3). It would be a permanent change and irretrievable because even if the turbines are removed after 20 – 25 years and not replaced, the scars of the tracks, even after restoration, would be an indelible reminder of the intrusion into this wildness. If the Dorenell wind farm is built, Scotland would lose an area which strongly exhibits the quality of wildness, lying partly within and partly outwith the National Park.

The impact on wildness – conclusions

- 4.17 This loss of wildness in the National Park and the Blackwater Forest (as an integral part of the setting of the Park (see CNPA 5)) would be important to people who enjoy this area, and it is of deep concern to the Cairngorms National Park Authority.
- 4.18 The value of wildness in the Scottish and particularly the Cairngorms context, relies substantially on its scarcity, its intrinsic qualities, its potential for nature, its economic value and, paradoxically its increasing accessibility (see paras 17 – 18 **CNPA 11**).
- 4.19 One aspect of wildness is tranquillity and this is a recognised attribute of the Park, as discussed for example at page 18 of the State of the Park report (**CD Q 2**). That analysis highlights the dangers of a gradual attrition of such qualities.

- 4.20 We diminish the resource of wildness at our peril, the loss of wildness is not easily realised on a case by case basis, but inexorably over time wildness permanently declines in its strength of character, and the area that it covers, if it is not recognised and carefully protected, case-by-case.
- 4.21 Sustainable economic development is important, but economic development is not sustainable if it leads to a steady attrition of key, increasingly rare and highly valued characteristics of the landscape of Scotland, especially those landscapes that have been recognised as of outstanding national importance, through designation as a National Park.
- 4.22 The need for renewable energy in Scotland is not in conflict with the need to protect wildness in the landscape. We simply need to ensure that wind farms and other renewable energy infrastructure are located in areas where, alone or cumulatively over time, they do not diminish the wildness of Scotland's landscapes. That approach is entirely consistent with national planning policy.
- 4.23 Decision makers need to have regard to how wildness is vulnerable to change and how it can be diminished over time. They need to protect areas which demonstrate this characteristic from adverse changes.