

CNPA 2

**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 2

**LANDSCAPE AND VISUAL IMPACT METHODOLOGY
USED BY DAVID TYLDESLEY**

Introduction

2.1 Landscape character assessment (LCA) is an important tool, which amongst other benefits, can help to facilitate renewable energy schemes. Landscape and visual impact assessments (LVIA) are integral parts of the environmental impact assessment (EIA) process. My evidence uses these separate but closely linked assessment procedures. An explanation and good practice method of LVIA is found in *Guidelines on Landscape and Visual Impact Assessment*, published on behalf of the Landscape Institute and Institute of Environmental Management and Assessment in 2002, often referred to as 'the GLVIA' (CD J 3). I base my evidence on that guidance, which provides a comprehensive approach to assessment universally adopted by landscape practitioners. However, it emphasises that because some aspects of assessment have to be adapted on a case-by-case basis, an assessor should explain the basis of how the significance of impacts (effects) have been assessed. I set out below a summary of the processes of LCA and LVIA, and terminology associated with them, and how I have come to the judgements I express in this and other Topic Papers and my precognition. I also comment on the application of the methodology in the Environmental Statement (ES) and the Supplementary Environmental Information (SEI)

Landscape Character Assessment

2.2 Landscape **Characteristics** are the components of the landscape (such as land form, rivers, buildings, roads or stone dykes), or combinations of them, that make a particular contribution to the character of an area. Landscape characteristics vary considerably from place to place but usually include combinations of:

- a) Visible and physical characteristics, such as stone tracks or broadleaved woodlands, which can be measured and described objectively;
- b) Visible but not physical characteristics of the landscape such as scale, colour, texture and pattern, which we see and which are important aspects of our experience of the landscape, but which are not of such a physical nature and cannot be described so objectively; and

- c) Characteristics which are neither visible nor physical, and although they cannot be seen, nevertheless are an important influence on our experience of a landscape, they include characteristics such as remoteness, wildness and tranquillity, and also our sense of the history of a place and its artistic, historical or cultural associations.
- 2.3 The non-physical characteristics of the landscape are more difficult to describe objectively. They can rarely be measured or quantified but their contribution to landscape character is just as important as the physical elements.
- 2.4 Landscape **Character** is the distinct and recognisable pattern of landscape characteristics that occurs in a particular type of landscape. It reflects particular combinations of, for example, landform, soils, vegetation, land use, experience of the landscape and human settlement. It creates the distinctiveness, identity and the sense of place which makes one landscape different from another. The recognition and understanding of landscape character is fundamental to contemporary landscape planning and landscape management which seek to manage change in the landscape in ways that will generally conserve, enhance and, where necessary, restore landscape character as important contributions to sustainable development, the quality of life and the implementation of the European Landscape Convention in Scotland
- 2.5 Landscape **Classification** is the process of identifying the character of different landscapes in any particular area and sorting them into distinctive **landscape character types**. The landscape character types can be mapped and described in a systematic way at various scales, ranging from the national landscape character database of Scotland, to units of local landscape character types in any particular area, a process referred to as **landscape characterisation**.
- 2.6 **Landscape Character Assessment** is the whole process of landscape classification, characterisation, understanding the history and evolution of the landscape, identifying pressures and trends for change in the landscape and usually producing guidelines to advise on the management of landscape change. This process is widely endorsed and encouraged by the Scottish Ministers, for example in Scottish Planning Policy, at paragraphs 112, 127 and 147 (**CD Bb 9**) and PAN 45 para 76 (**CD C 1**) and PAN 60 at paras 24 – 26 (**CD C 6**). The Cairngorms Landscape Character Assessments of 1996 and 2009 (**CD Q 5 and CNPA 6**) are examples of these assessments.

Landscape Impact Assessment

2.7 **Landscape impact assessment** assesses changes to the landscape, as a resource in its own right, how its character may be changed, beneficially or adversely, by changes to its characteristics. Usually the significance of the effects (impacts) are judged in relative terms, using expressions such as major, moderate, minor or negligible adverse or beneficial impacts etc. (pages 87 – 88 **CD J 3** the 'GLVIA'). In this context beneficial impacts would strengthen, enhance, restore or otherwise improve the distinctiveness of landscape character. Adverse impacts would reduce landscape distinctiveness, remove characteristic elements and / or add uncharacteristic elements and thereby diminish landscape character. It is important to distinguish between beneficial and adverse effects in order to consider mitigation, which is a fundamental part of the landscape and visual impact assessment process (Parts 5 and 7 **CD J 3** the 'GLVIA').

Visual Impact Assessment

2.8 **Visual amenity** is the benefit, advantages or simply the enjoyment gained from seeing the landscape, from a view, or the perceived value of a view, in terms of what is seen and may be enjoyed by an observer. **Visual Impact Assessment** is the process of assessing the effect of one or more proposed changes to views that are experienced by people and how the changes may affect the (visual) amenity of the view, beneficially or adversely.

2.9 For example, a view may be impeded, narrowed or shut off (visual obstruction), views of unsightly features may be hidden (screened) or partly hidden (filtered), new features may be introduced (visual enhancement or intrusion), or features may be removed (visual reduction). As with landscape impacts the significance of effects is usually judged in relative terms such as major, moderate, minor or negligible adverse or beneficial impacts on visual amenity (pages 87 – 88 **CD J 3** the 'GLVIA').

2.10 As with landscape impact assessment, unless beneficial and adverse effects are distinguished, it will be difficult to address mitigation.

2.11 To structure the assessment it is common practice to select specific (static) viewpoints or specific (moving) linear viewing routes. Tools are used to help the assessment, such as the definition of visual envelopes or zones of theoretical visibility.

- 2.12 A **Visual envelope** is the extent of possible visibility to or from a specific area or feature or proposed development, i.e. the area within which, theoretically, it may be seen, subject to local obstructions to views such as buildings and woodlands. It is usually computer generated.
- 2.13 A **Zone of Theoretical Visibility (ZTV)** - is the area within which a proposed development may have an influence or effect on visual amenity; it may be the same as, or a smaller area than, the visual envelope because distance may mean that although the development would be theoretically visible it would not influence visual amenity, because it is too far away to be noticeable. Again, within the ZTV there will be areas from which the subject cannot be seen owing to local obstructions such as buildings, cuttings or smaller woodlands. It should be emphasised that visual envelopes and ZTVs are tools which contribute to landscape and particularly visual impact assessment. They are not, and do not purport to be, accurate in detail and always need field validation. Whilst very useful, they need to be used with caution. A ZTV is computer generated. Its accuracy depends to an extent on the sensitivity of the digital terrain model used, which may typically be 10m or 50m.
- 2.14 **Visualisations** are the outputs of various techniques devised to illustrate change to the landscape or views for landscape and visual impact assessment. They may include photomontages, video montages, wireline diagrams and other computer generated graphics, sketches, annotated photographs or drawings, two or three dimensional animation, interactive virtual reality models or physical modelling. They should generally be used in conjunction with field validation.
- 2.15 Wirelines and photomontages are the most frequently used visualisations in LVIA, and are used in **CD H 5** - the ES, and wirelines are used in **CD H 7** – the SEI. They should be presented so as to avoid giving users, especially those not used to using and interpreting photomontages, a false impression. Photomontages particularly have to be produced, presented and used with great care because there is a tendency for them to underestimate the true appearance of a wind farm from most viewpoints (**CD I 4** page 60 para 6.1.18). This was the subject of a letter from the Director and Chief Planner of the Scottish Government dated 20th January 2009 (**CNPA 13**). The letter points out how wide panoramic images require some care in the way they are used, because they can have the effect of reducing the perceived impact of a wind farm, and that they can usefully be supplemented by single frame images. The latter do not provide the same degree of ‘context’ for the view, but this will not matter when an image is viewed in the field where the context is observable.

2.16 It is generally recommended, e.g. **CD Q 13** page 73 and **CD I 4** page 60 para 6.1.21, that the viewing distance for a photomontage should be a comfortable distance, which for A3 images is usually 40 – 50 cm. The photomontage image height is recommended to be approximately 20cm, but for practical reasons, over 13cm is acceptable (**CD I 4** page 60 – 61 para 6.1.21 and **CD Q 13** page 79 para 129). The photomontages in the ES are about 15cm high and should be viewed at 40cm. The ES does not otherwise explain how a photomontage should be used, but rather refers the reader to **CD Q 13**, which is a highly technical and substantial document. It would have been helpful if the reader was told in the ES itself how to use photomontages, or was more explicitly directed to particular parts of this large document, for example Appendix B is important at B.17 – B.21 on pages 175 - 177. There are no single frame images in the visualisations in the ES.

Assessing the significance of change

2.17 To state the obvious, a **significant effect** is one that is not insignificant, that is, it is not trivial or inconsequential. It is an effect that is, or could be, important in the context in which it is used. For example, in the process of environmental impact assessment, it is only likely "significant" environmental effects (both negative and positive) that need to be assessed and which could trigger the production of an ES and the EIA procedures. It does not, therefore, have to be an obvious or major effect but an effect which in any context merits close consideration.

2.18 Significant does not equate to non-acceptability. This is obvious because many projects that have significant effects on the environment, which had to be addressed in EIA procedures, have been granted planning permission when the development plan and other material considerations were taken into account. There are degrees of significance of effects, which is referred to as **impact significance** - some changes may be more significant than others in policy terms or when making a decision as to whether to permit a change. The significance of effects can be influenced by planning policies and designations (see pages 16 - 17 **CD J 3** the 'GLVIA').

2.19 If an assessment goes further and states that a proposed change (whether assessed as significant or not) is 'acceptable' or 'unacceptable' it is important that it sets out very clearly to whom the change would be acceptable and the criteria used to judge acceptability, otherwise this is a meaningless term in assessment.

2.20 In landscape and visual impact assessment it is not usually possible to calculate precise quantifications of change and to attach significance to them by reference to thresholds or a numerical scale. Instead judgements have to be made on a relative basis and expressed in a consistent and systematic way that aids decision making.

2.21 The **sensitivity of the landscape** depends on a range of factors including its character, its capacity to accommodate the proposed change, its condition and integrity, trends or pressures for change in landscape character and, where an evaluation exercise has been undertaken, whether it has been identified as a landscape of particular importance in policy terms (e.g. a National Park, National Scenic Area or Area of Great Landscape Value and in future Special Landscape Areas). Examples of the most sensitive landscapes are those with limited capacity to accommodate the proposed change, landscapes with a particularly typical or distinctive character, landscapes that have historical continuity and integrity and are in good condition, rare landscape types, designated landscapes and landscapes that have been specifically designed or planned for visual amenity e.g. as the designed setting of a grand house or castle (section 6 **CD J 3** the 'GLVIA').

2.22 **Sensitivity of a view** depends on who and how many people would see the view, under what circumstances, why they are there to see the view, for how long etc. Examples of the highest sensitivity views are scenic viewpoints, scenic routes, hill / mountain tops / ridges visited for their scenic views, tourist routes and hotels, paths and other linear routes walked for the enjoyment of the natural heritage, public open spaces, residential properties etc (see also paragraphs 7.31 – 7.35, **CD J 3**).

2.23 *Sensitivity* of both landscape and visual receptors is usually expressed in a simple scale - high, medium or low. The scale of sensitivity for the landscape which I use in my assessment of the application proposals is shown below.

Table 2. 1 Scale of Sensitivity of Landscape Receptors	
High Sensitivity	Key characteristics and features which contribute significantly to the distinctiveness and character of the landscape character type. Designated landscapes eg. National Parks, NSAs. Other landscapes which are clearly valued locally whether designated as AGLV / SLA or not. Landscapes identified as having low capacity to accommodate the proposed form of change. Landscapes with a particularly typical or distinctive character, landscapes that have historical continuity and integrity and are in good condition. Rare landscape types. Historic and designed landscapes in, or candidates for, the Inventory

Table 2. 1 Scale of Sensitivity of Landscape Receptors

Medium Sensitivity	Other characteristics or features of the landscape that contribute to the character of the landscape locally. Landscapes identified as having some tolerance of the proposed change subject to design and mitigation etc. Unusual landscape types but which are not rare. Historic and designed landscapes in reasonable condition and reasonably intact that are not in, or candidates for, the Inventory
Low Sensitivity	Landscape characteristics and features that do not make a significant contribution to landscape character or distinctiveness locally, or which are untypical or uncharacteristic of the landscape type. Landscapes identified as having higher capacity to accommodate proposed change subject to design and mitigation etc.

2.24 The scale of sensitivity for visual receptors which I use in my assessment of the application proposals is shown below.

Table 2.2 Scale of Sensitivity of Viewpoints / Visual Receptors

High Sensitivity	Scenic viewpoints, Munros, other hill / mountain tops / ridges visited for their scenic views, tourist routes; main roads known to carry high levels of tourist traffic (even though not designated as tourist routes, e.g. the A9 from Perth to Inverness); tourist hotels, tourist attractions and destinations, long-distance routes, core paths, paths and other linear routes regularly walked for the enjoyment of the natural heritage, public open spaces with outward views of the landscape such as country parks and picnic sites, recreational areas where enjoyment of the natural heritage is a key aspect of participation, such as golf courses, dwellings and residential homes, cemeteries and other areas where a sense of place, peacefulness or tranquillity are important, sensitive historical sites or sites with strong artistic or cultural associations relating to landscape setting or sense of place, historic gardens and designed landscapes
Medium Sensitivity	Schools, community buildings hospitals; nursing and convalescent homes; offices in prestige business parks; tracks, other paths and routes that may be used for countryside recreation; other peaks, summits and hills that may be accessed by walkers; other venues for countryside recreation; other roads in open countryside
Low Sensitivity	Work places other than those above, e.g. factories, warehouses etc, playing fields, sport stadiums, roads in urban or peri-urban areas other locations where enjoyment of the natural heritage is not relevant or important to the experience or function of the place

2.25 **Magnitude of change** includes consideration of a range of factors including the nature, timing, duration, scale, extent, reversibility of the change. Magnitude of change is usually expressed in a simple scale such as ‘substantial, moderate, slight and negligible’. The scale of magnitude of change for the landscape resource and visual receptors which I use in my assessment of the application proposals is shown in Tables 2.3 and 2.4 below.

Substantial magnitude	Changes which are of large scale or widespread or otherwise important in the context of the landscape resource to key characteristics or features or to the landscape's qualities, character, integrity or distinctiveness, for more than 2 years
Moderate magnitude	Changes which are of moderate scale, or more local, or otherwise noticeable changes in the context of the place, for more than 2 years, or large scale or widespread or otherwise important changes for more than 6 months but less than 2 years, to key characteristics or features or to the landscape's qualities, character, integrity or distinctiveness.
Slight magnitude	Changes which are of smaller scale, or limited area, or otherwise less noticeable changes in the context of the place, for more than 2 years; or changes which are of moderate scale, or more local, or otherwise noticeable changes in the context of the place, for less than 2 years, but more than 6 months; or changes which are large scale or widespread or otherwise important changes for less than 6 months; to key characteristics or features or to the landscape's qualities, character, integrity or distinctiveness.
Negligible or no change	Any change that would be negligible, unnoticeable or there are no predicted changes.

Substantial magnitude	Changes which are dramatic, or large scale, or widespread, or intrusive or otherwise important in the context of the view, or the substantial obstruction of a view for more than 2 years
Moderate magnitude	Changes which are of moderate scale, or more local, or otherwise noticeable changes in the context of the view, for more than 2 years or Changes which are dramatic, or large scale, or widespread, or intrusive or otherwise important in the context of the view, or the substantial obstruction of a view for more than 6 months but less than 2 years
Slight magnitude	Changes which are of smaller scale, or limited area, or otherwise less noticeable changes in the context of the view, for more than 2 years, Changes which are of moderate scale, or more local, or otherwise noticeable changes in the context of the view, for more than 6 months and less than 2 years or Changes which are dramatic, or large scale, or widespread, or intrusive or otherwise important in the context of the view, or the substantial obstruction of a view for less than 6 months
Negligible or no change (none)	Any change that would be negligible, unnoticeable or there are no predicted changes.

2.26 The **scale of impact significance** follows logically from the above analysis. It will be apparent that when making decisions about proposed changes - developments etc - in a landscape or view, the most significant (major) changes would be those involving a combination of high sensitivity and substantial magnitude. Changes of moderate magnitude affecting a receptor of medium sensitivity would be assigned a moderate significance; slight change to a receptor of low sensitivity would be assigned a slight

adverse or beneficial significance. The scale of impact significance I use in my assessment of the application proposals is shown below.

Table 2.5 Scale of Impact Significance in this Assessment				
Sensitivity of the landscape or viewpoint	Magnitude of Change			
	Substantial	Moderate	Slight	Negligible/None
High	Major	Major	Moderate	Negligible/None
Medium	Major	Moderate	Minor	Negligible/None
Low	Moderate	Minor	Minor	Negligible/None

2.27 The shaded cells in the table are those impacts which I regard as significant in LVIA terms. Taking the normal meaning of significance, (the quality of being worthy of attention, importance) it will be seen that the significance of changes is not absolute but measured by judgement on a scale, for example, ranging from effects that are of major, moderate or minor significance / importance. This simply reflects the fact that there are degrees of significance and therefore the weight to be attached to impacts may vary. I consider that changes or effects that are of major or moderate importance, on the above scale, are capable of being material considerations in planning decisions. Effects other than de minimus, or negligible effects on high sensitivity receptors should be taken into account, they should not be ignored. Indeed, as indicated in paragraph 7.39, page 92 of **CD J 3**, small effects on highly sensitive sites can be more important than large effects on less sensitive sites. This is also consistent with the findings of Professor Benson in his authoritative report to SNH on *Visual Assessment of Windfarms Best Practice* in 2002 (see para 6.4.2 **CD I 4**).

2.28 However, this does not mean that all effects on high sensitivity receptors, no matter how small, are unacceptable. It does not amount to an approach that would preclude an otherwise suitably located wind farm simply because it could be seen from a sensitive viewpoint, no matter how far away.

2.29 Effects up to 30km have the potential to be significant, which is why a 30km – 35km radius for the study areas and ZTVs, in ES for wind farms with turbines over 100m height to blade tip, have been recommended by SNH and almost universally adopted.

2.30 PAN 45 (**CD C 1**) contains a table on page 27 (Figure 8) which gives the “general perception of a wind farm in an open landscape”. There is an increasing recognition in the landscape profession that the distances given and the descriptions of perception

need to be refreshed in light of increasing familiarity with wind farms and the increasing height of turbines. The perception descriptions are not easily used in practice, for example, I am not sure what the difference may be between “prominent” and “relatively prominent”, without knowing what it would be relative to; and “only prominent in clear visibility” seems to me to be the same as “prominent” in the conditions that people most enjoy and appreciate views of open countryside. It is unclear what height of turbine the table refers to; but in my experience for wind farms with turbines of 126m height, the distances for each level of perception should be significantly increased. In my experience such wind farms can be prominent in an open landscape at distances of well over 20km, with the movement of the blades clearly noticeable.

- 2.31 Where significant effects are adverse, they should be considered for mitigation, where possible. Where such adverse effects would be contrary to the development plan they could lead to a refusal of planning permission, subject of course to other material considerations.

Cumulative Landscape and Visual Impact Assessment

- 2.32 In this context, in respect of both landscape and visual amenity, ***cumulative effects*** are those which occur, or may occur, as a result of more than one project being constructed. The effects of two or more developments may cumulate to such an extent that, whilst it may be appropriate to grant permission for each project on its own, in terms of its localised effects on landscape character, when these effects are combined with other changes (whether or not they are the same type of project) the effects would so change the landscape character and / or the enjoyment of visual amenity over a wider area, that they would be significantly diminished. These accumulating changes to landscape character or visual amenity could include past changes, for example trends or pressures for change over long time periods, as well as present and future changes that may be under consideration in any particular project decision (see pages 85 – 86 **CD J 3**).

- 2.33 Although methodology and terminology are still evolving, there is an increasing consensus about some aspects of cumulative landscape and visual impact assessment. It is now standard practice in cumulative landscape and visual impact assessment (paragraph 188 Scottish Planning Policy **CD B 9**) to consider the existing situation, often referred to as the “baseline”, which comprises constructed wind farms and those which have been given consent, but which are not (fully) implemented. To

these we add the subject proposal; firstly, on its own (because there may be no other proposals permitted); and then the subject proposal in addition to other projects that have been applied for and remain in the decision making process (including those at appeal).

2.34 In respect of visual impacts, there are (at least) three types of cumulative effects in this context:

- a) *in combination* - where two or more features are seen together at the same time from the same place, in the same (arc of) view where their visual effects are combined;
- b) *in succession* - where two or more features are present in views from the same place (viewpoint) but cannot be seen at the same time, together because they are not in the same arc of view - the observer has to turn to see new sectors of view whereupon the other features unfold in succession;
- c) *in sequence* - where two or more features are not present in views from the same place (viewpoint) and cannot, therefore, ever be seen at the same time, even if the observer moved round the arc of view, the observer has to move to another viewpoint to see the second or more of them, so they will then appear in sequence. The frequency of occurrence in the sequence may be highly variable, ranging from *frequently sequential* when the features keep appearing regularly and with short time lapses between (clearly speed of travel influences this as well as distance between the viewpoints) down to *occasionally sequential* where there may be long time lapses between appearances, because the observer is moving very slowly and / or the there are large distances between the viewpoints (even if not between the features).

2.35 To avoid confusion it is important to use this terminology accurately.

2.36 I have been involved in the evolution of cumulative landscape and visual impact methodology for some eight years. I originated the concepts of combined / simultaneous, successive and sequential effects which were first set out in my precognition for SNH at the An Suidhe wind farm inquiry in 2002, an approach now almost universally adopted.

2.37 I gave evidence on behalf of Perth and Kinross Council at the conjoined inquiries into the cumulative effects of four wind farms in the Ochil Hills in 2007. I presented an assessment of many permutations of wind farms, based on an agreed series of visualisations, and the methodology outlined above. This examined, amongst other things, the consistency of images of wind farms in the landscape and views. SNH adopted a similar approach in their evidence to the conjoined inquiries. The Reporter implicitly accepted the approach, and used the outputs of this methodology in her analysis of a complex situation, with many wind farms in various permutations.

2.38 With SNH, I have iteratively developed the concept of the accumulation of turbines in a landscape character type, through a series of stages, from being a single 'landscape feature or landmark', to a 'landscape type with wind farms', and thence to a 'wind farm landscape', or a 'landscape type dominated by wind farms'.

2.39 It is worth noting that the number of wind farms making up the accumulation of the total number of turbines is likely to be relevant. For example, a single wind farm of 50 turbines could create a 'landscape dominated by wind farms' in just the same way that five wind farms of 10 turbines could. But the former would not be a cumulative impact, whereas the latter would be; the effect on the landscape, however, is much the same.

2.40 Where the number of wind farms becomes particularly important is when considering the compatibility of images in cumulative assessment. Individual wind farms are, at least initially, designed as a single entity. However, several wind farms coming forward in a series are very rarely designed to be compatible with each other. Cumulative impacts can be compounded by conflicting designs and inconsistent images.

2.41 Cumulative landscape and visual impact therefore needs to consider:

- a) the effect that permutations of wind farms have on landscape character and the degree to which an accumulation of turbines can alter a landscape character type;
- b) the compatibility of the permutations of wind farms seen together, for example the consistency of their images (only relevant for combined or immediately successive cumulative effects); and
- c) the effects that a series of wind farms may have on visual amenity at particular viewpoints (in combination or successive), or recurring wind farms may have on people's amenity as they travel through the landscape (sequential).

2.42 In the case of the National Park, the important effects are those at (a) on the Ladder Hills and Blackwater Forest landscape unit, and (c) on many viewpoints in and when travelling around the National Park.

‘Acceptability’ of landscape and visual impacts

- 2.43 I indicated in paragraph 2.17 above that if an assessment goes further and states that a proposed change is ‘acceptable’ or ‘unacceptable’ it is important that it sets out very clearly to whom the change would be acceptable and the criteria used to judge acceptability, otherwise this is a meaningless term in assessment.
- 2.44 My assessment of acceptability in this case relates to the impact that the proposal would have on the National Park and its setting. It is my assessment of acceptability, but importantly, it is consistent with that of the Officers of the National Park Authority. Furthermore, the Board of the National Park Authority has unanimously concluded that the proposal was unacceptable and strongly objected to it (see CNPA 5 and **CD K 14**) on the basis of the same impacts.
- 2.45 My assessment of unacceptability is based on a careful assessment of the significance of the landscape and visual impacts of the proposal, in CNPA 3, and the other material considerations, including national and local planning policy and weighing the benefits of the renewable energy that would be generated by such a large scheme, as set out in the report to the National Park Authority Committee (**CD K 13**), and other evidence before this Inquiry, for example, **CD H 3** the ES Written Statement and **CD H 6** the Planning Statement.
- 2.46 In particular in this case, ‘acceptability’ must also address the statutory duty of decision makers to seek to collectively achieve the aims for which the Cairngorms National Park is designated, as explained in CNPA 5. I also have regard to the policies which refer to the need to enhance the landscape of the National Park, in the National Park Plan (**CD F 4**) and the merging Local Plan (**CNPA 7**), this is explained in Mr Tait’s written submission on policy for the CNPA, so it is not repeated here.