

**CNPA 3**

**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 3**

**THE LANDSCAPE AND VISUAL IMPACTS OF THE  
DORENELL WIND FARM ON THE CAIRNGORMS  
NATIONAL PARK**

## Introduction

- 3.1 The Dorenell wind farm would affect seven broad areas of the Cairngorms National Park, including nearly all of the important summits and upper hill areas from the central massif across the north-eastern quadrant of the National Park, namely, and in order starting with the nearest to the proposal:
- a) The Ladder Hills
  - b) The Braes of Glenlivet.
  - c) The Hills of Cromdale
  - d) Hills from Glen Avon to the Lecht Road
  - e) Hills between the Dee and the Don (including Morven)
  - f) Hills north of Glen More
  - g) The Cairngorms Massif
- 3.2 This paper provides a context for the assessment of impacts on these areas, describes what would be visible of the proposed wind farm from these locations, based on the information presented in the ES and SEI and supplemented by field work. It assesses the significance of the impacts on the National Park and its enjoyment. The methodology for assessing the significance of the impacts is set out in Topic Paper CNPA 2. CNPA 4 specifically addresses the consideration of wildness as a landscape characteristic and a special quality of the National Park. Frequent references are made to the two landscape character assessments (LCAs) for the Cairngorms which are: the 1996 study **CD Q 5**; and the 2009 study **CD Q 16**.

## The Ladder Hills

- 3.3 The Ladder Hills are part of the North Eastern Hills landscape character area in the Cairngorms NP LCA of 2009, described on pages 367 – 370. In the 1996 LCA the Ladder Hills are also part of the more extensive area of North Eastern Hills (Area 6), which in that assessment include the Hills of Cromdale. Relevant characteristics include the massive and spectacular land form and heather clad summits and slopes; a complex, highly distinctive, generally remote, landscape which is secluded in the glens and exposed on the tops. There is a tremendous sense of space and openness linked to great distance, on the upper slopes and ridges, from where there are panoramic and often spectacular views. The 1996 LCA highlights that the sense of openness and remoteness is emphasised by the heather clad moorland slopes and numerous interlocking and receding horizons.

- 3.4 The 1996 LCA also clearly indicates in Figure 17 that the landscape character type extends beyond the study area boundary, across the application site. The 1996 LCA study area boundary is broadly consistent here with the National Park boundary, but the hills to the west of Glen Fiddich are included in the study area whereas they are out with the National Park). The area exhibits a strong sense of wildness (CNPA 4).
- 3.5 From key parts of the Ladder Hills in the National Park, the hubs and blades of 49 or more turbines would be visible at close range, being distances from about 2.5km to about 6km (ES Figures 9.4, 9.5e and 9.6). Most of the views would be from higher or similar elevations to the wind farm. The hubs and blades of over 25 turbines would be visible from significant parts of the north facing slopes and northern ridges of the Ladder Hills; from Bachd Buidhe, across to Carn na Glascoill then southwards to the summits at Letterach and Little Geal Charn, then north down the ridge to the Park boundary at Geal Charn; and further east from Caochandye Hill. The ZTVs (blade tip and nacelle heights) show the actual extent of the turbine visibility because there are no local screening effects from woodlands or micro-topography in the Ladder Hills.
- 3.6 Towards the eastern edge of the Ladder Hills and further south, up to 48 blade tips and up to 36 hubs would be prominent from Moss Hill, Hill of Rhinstock, Ladylea Hill and Clashenteple Hill above Glen Nochtly and Glen Buchat, at a distance of about 8.5km to 10km.
- 3.7 To the west up to 36 turbines (hub height) would be seen from Carn Mor and, to a lesser extent, but still the blade tips of up to 24 turbines (up to 12 hubs), between there and Carn Leith, at distances of between about 8km and 11km.
- 3.8 Further extensive views of the blade tips of up to 36 turbines, (up to 24 hubs) would be seen from areas of the Ladder Hills, on north facing slopes above the Braes of Glenlivet, including Tom Trumper (see further the assessment on the Braes of Glenlivet), and Carn Mor at 10km.
- 3.9 ES Viewpoint 11, the summit of Little Geal Charn is one of the views, but it should be borne in mind that this is some distance from Dorenell relative to other parts of the Ladder Hills and the land form of the summit and ridge create a large foreground area, less typical of most views of the wind farm from these hills, where nearer turbines would not be partly obscured by an extensive foreground.

- 3.10 The views from these highest parts of the Ladder Hills are exhilarating and panoramic, round 360 degrees. All directions of the views are important because those in a generally southward direction towards the Cairngorm massif are complemented by views generally eastwards and westwards across the glens to further hills, and northwards over wild and remote hills in close proximity to the observer. The ES (para 9.359 - 360) recognises that the viewpoint is in the National Park and in the AGLV / Area of Landscape Significance. It acknowledges that views are attracted in a northerly direction towards the wind farm site, but these are not 'secondary', as suggested by the ES at paragraph 9.360. They are at least as important as the views to the interior of the Park, because the hills of the application site are very close, they are dramatic in their land form and appear as an extension of the Ladder Hills, with the landscape character extending northwards, with massive hills, interlocking, receding ridges and sweeping, uninterrupted skylines.
- 3.11 The assertion in the ES at paragraph 9.361, that the Ladder Hills seem 'marginal' to the National Park or the Cairngorms massif, is not agreed, they are an integral part of the Park and highly characteristic of its landscapes; views are typical of those enjoyed in many of the higher and remoter parts of the Park. The massive, rolling, remote, wild and semi-natural upland moorlands of the North Eastern Hills form a buffer, or buttress supporting and abutting the vast central massif, but that does not make them 'marginal'; rather it emphasises the importance of the juxtaposition and the variety and complexity of the National Park's geology and topography, which form part of its special qualities. The whole Park is of outstanding national importance, every one of the landscape types in the Park makes an important and positive contribution; parts of it cannot be diminished as 'marginal' (see further CNPA 5).
- 3.12 The ES at paragraph 9.362, states that the Ladder Hills possess a sense of remoteness on account of their elevation, rough vegetation and distance from the nearest public roads and settlement; but the argument that this is compromised by evidence of human intervention within the adjacent glens (which, as the ES points out at 9.360, are generally screened from most of the hills) and pathways and cairns is not accepted. There are few distinct paths visible from the viewpoint. A partly stoned track climbs from Glenbuchat Lodge to the hills, but this is largely screened in a deep glen and is not a modern, heavily engineered track; it is often barely visible except at close range. Cairns are small and part of the character of these remote hills.

- 3.13 The photograph at Viewpoint 11a in the ES (close to the National Park boundary at Round Hill) as well as viewpoint 11 (and a site visit) clearly demonstrate the sense of remoteness and wildness experienced in these hills.
- 3.14 The wind farm would be the dominant visual focus. Collectively, the turbines would overwhelm the views from the Ladder Hills. Turbines would spread across a wide area. The wind farm would seem to cover a very broad band of hills visible to the north.
- 3.15 The turbines would undoubtedly diminish the vertical scale of the hills, a particularly disturbing, detrimental and, bearing in mind the scale of these hills, a worrying effect, demonstrating the inappropriate scale of the wind farm in terms of the height of the turbines, the number of turbines and their spatial distribution across the hills.
- 3.16 Visual impact assessment demonstrates that turbines would be seen randomly scattered in a complex, chaotic, confusing pattern, both vertically (varying elevations) and horizontally (incoherent spatial distribution) of irregularly spaced, often overlapping forms, exacerbated by the uncharacteristic vertical shapes and mechanical rotation of the blades, contrasting with the simplicity of the landform and landscape.
- 3.17 Turbines would be seen in front of, on and behind the skyline (viewpoints 11 and 11a). When viewed from the hills the turbines would be emphasised by the sun shining from behind the observer, particularly during low light conditions (ES paragraphs 9.364 – 370). No weather condition would mitigate the effects of the turbines (except fog and dense low cloud, when no one would be on the Ladder Hills to enjoy the views) because some would be seen against a land backdrop, some against the sky and some against both backgrounds.
- 3.18 Despite the assertions in the ES at paragraph 9.369, the turbines would add a new element to the ‘historical pattern of land use within the Ladder Hills’, but one that would be completely alien to it. They would not be “largely contained by the land form” or “appear as a single cohesive mass”, as suggested in the ES at 9.370. Indeed, the ES then admits that the image they present would be a “complex one” that would contrast with the simplicity of the surrounding landscape. I agree.
- 3.19 The access tracks (see for example, Figure A9.13 Appendix 9.8) would seriously increase these negative impacts. They would be highly visible, indeed prominent and incongruous, a complete contrast to the landscape of the hills (ES paragraph 9.371).

- 3.20 For at least 17 months, construction activity (and later maintenance visits and decommissioning) would add further to the negative impacts of the wind farm introducing alien and incongruous vehicle movements and construction activity into a wild and remote area forming the setting of the National Park (see CNPA 5).
- 3.21 Although the 'borrow pit' would not be visible, the construction compound would also be a large, noisy, busy, incongruous, conspicuous feature seen from parts of the Ladder Hills.
- 3.22 The Ladder Hills are a landscape of high sensitivity, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).
- 3.23 The sensitivity of visual receptors in this area is undoubtedly high, being high hills specifically visited for their scenic views and the enjoyment of the natural environment and heritage and where the qualities of wildness, peacefulness and tranquillity are strongly experienced in a location with a strong sense of place (see Table 2.2 of CNPA 2). The ES (Figure 21.1) recognises five peaks in the Ladder Hills are important tourist attractions.
- 3.24 The magnitude of impact would be substantial for both the landscape resource and visual amenity (Tables 2.3 and 2.4 CNPA 2). The construction and operation of the Dorenell wind farm would have a major negative impact on the landscape character and enjoyment of the National Park in the Ladder Hills. This is consistent with the findings of the ES at paragraph 9.376 – 9.377.
- 3.25 Glens of Foudland, Cairnmore and Dummie wind farms are already visible from the Ladder Hills at distances of about 31km - 35km (from Viewpoint 11). Kildrummy and Drummair wind farms will be visible from the Ladder Hills in the National Park at about 11.7km and 26.5km respectively. Balnamoon Farm, Myreton and Mains of Hatton may be visible but would not add significantly to cumulative effects from the Ladder Hills owing to these single or in the case of Mains of Hatton, cluster of three, turbines being in excess of 40km. If permitted Clashindarroch 18 turbines and Cushnie (9 turbines) would also be visible at distances of 13km and 18km respectively.

- 3.26 Cumulatively, Dorenell would be a very substantial addition to baseline, because the only wind farms visible are small and towards the limit of distance where significant effects are experienced. Dorenell would be the most significant addition to potential cumulative effects, of all proposed wind farms, owing to its much larger scale, wide spatial extent and closest proximity to the Ladder Hills. The written representations on behalf of the Aberdeenshire Council (**CNPA 8**) are particularly pertinent to the analysis of cumulative effects.
- 3.27 The Blackwater Forest and other hills, between the National Park boundary and Dufftown and between the B9009 and the A941, are the same landscape character type and, in terms of landscape characterisation, can be treated as the same landscape character unit, irrespective of the National Park boundary. The whole of this landscape unit is currently typical of the North Eastern Hills, Ladder Hills sub-unit (**CD Q 5 and CD Q 16**). The Dorenell wind farm proposal is so large that although it constitutes a single wind farm, it would change the landscape character of the Ladder Hills sub unit, both within and outwith the National Park, to 'North Eastern Hills Dominated by Wind Farm' (see further CNPA 2, paras 2.38 - 39). The effect of the proposed development on the setting of the National Park is set out in CNPA 5.

### **The Braes of Glenlivet**

- 3.28 The Braes are described as a distinct landscape character area in the Cairngorms NP LCA of 2009, at pages 163 – 166. In the 1996 LCA the Braes are included in the Glenlivet strath with Glen Rinnes (Area 16). Relevant characteristics of the area include the surprising width of the howe, contained by a backdrop of steep hills (including the Ladder Hills); a strong sense of seclusion and 'secrecy' reinforced by the narrow gateway of the Crombie Water; which in turn led to the historical use of the area for illegal whisky distilleries and the discretely located, once secret Catholic seminary of the College of Scalan. The area is very self-contained, with little inter-visibility with surrounding areas beyond the immediate Ladder Hills.
- 3.29 The sensitivity of the landscape is high, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).

- 3.30 The sensitivity of visual receptors in this area is undoubtedly high, being a remote howe specifically visited for its scenery and the enjoyment of the natural environment and heritage and where the qualities of peacefulness and tranquillity are strongly experienced and where historical and cultural associations are important in a location with an outstanding sense of place and history (see Table 2.2 CNPA 2).
- 3.31 An extensive part of the Braes would be potentially affected by the proposed wind farm (Figures 9.5e & 9.6 ES). Occasional buildings, plantations and some micro-topography would reduce these effects locally, but over most of this landscape character unit in the National Park (p.163 **CD Q 16**) the rotating blades of up to 11 turbines would be visible (ES para 9.211) and many would also be visible at hub height (Figure 9.6). On the lower, north-facing slopes, 13 or more, and on the upper slopes, 25 or more, blades would be visible.
- 3.32 The area is one that is popular with visitors, being actively promoted by the Glenlivet estate (**CNPA 16**). Attractions in the glen include a distillery, several whisky trails and the former seminary at the College of Scalán. The visitors' book in the always-open building of the former seminary makes interesting reading, recording numbers of people who return here, on a personal or religious 'pilgrimage', to a place where they feel, and have expressed, their abiding sense of peacefulness, calmness, serenity, and quiet contemplation. The enclosed grounds and the walk to the seminary are part of the experience of the Braes. Up to 11 turbines (hubs and / or blade tips) would be visible from the vicinity of the seminary. A short distance away, just up the hill, where visitors are encouraged to walk towards Tom Trumper, up to 24 turbines would be visible at less than 10km (ES para 9.211) (see also paragraph 3.8 above).
- 3.33 The walk from the road (where there are parking facilities at a farm) to the College of Scalán and on to the slopes of the Braes is a 'Core Path' reference GT 2 on Map 13, page 27 of **CNPA 15**. Comparing this plan with that of the ZTVs, up to 12 turbines would be seen from parts of other Core Paths in the Braes, namely GT 3 towards the River Livet and GT 5, the main walking route through the Braes.
- 3.34 The magnitude of change would vary across the Braes from negligible, in some parts, to substantial; an important change to key characteristics of the landscape resource and intrusive effects on visual amenity; a significant (major adverse) impact on landscape and visual amenity.

- 3.35 Views of the turbines would detract from the senses of remoteness, seclusion, self containment and tranquillity. The turbines would be a major intrusion into the Braes of Glenlivet. They would introduce a modern industrial presence in the surrounding hills, diminishing the enjoyment of the strong historical and cultural associations. The presence of the turbines in nearby hills would significantly affect the enjoyment of this unique and distinctive part of the National Park.
- 3.36 Importantly, in light of the character of the Braes described here and in **CD Q 16**, currently there are no wind turbines visible from the Braes. Cumulative effects are not therefore relevant here, except to say that the intrusion would be all the greater because there is no intrusion at present.

### **The Hills of Cromdale**

- 3.37 The Hills of Cromdale are described as a distinct landscape character area in the Cairngorms NP LCA of 2009, at pages 363 – 365, however, the hill mass extends south of the A939 into the North Eastern Hills landscape character area, described on pages 367 - 370. In the 1996 LCA the Hills are also part of the more extensive area of North Eastern Hills (Area 6), which in that assessment include the Hills of Cromdale. Relevant characteristics of the area include the well defined, easily recognisable land form of rounded summits and formidable flanks, incised by deep river valleys. The upper parts of the hills are primarily used for grouse shooting and are popular for hill walking, the relatively narrow spine affords ready access to the hills from Grantown-on-Spey, Tomintoul and other settlements around, providing exhilarating, undulating ridge walks with panoramic views.
- 3.38 The sensitivity of the landscape is high, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).
- 3.39 The sensitivity of visual receptors in this area is undoubtedly high, being high hills specifically visited for their scenic views and the enjoyment of the natural environment and heritage and where the qualities of wildness, peacefulness and tranquillity are strongly experienced in a location with a strong sense of place (see Table 2.2 CNPA 2).

- 3.40 The parts of the Hills of Cromdale (extending into the North Eastern Hills) from which the proposed wind farm would be visible lie between 11km and about 20km from the turbines (ES Figure 9.5d & 9.6). The affected areas would be the hill tops along the ridge and the upper, mainly east and north-east facing slopes from Carn Eachie on the boundary of the National Park (Viewpoint 17), Creagan a Chaise (722m AOD and the Jubilee (of 1977) Cairn), Carn na Cloiche, Baddoch (562m AOD), Tom an t-Suidhe Mhoir (531m), southwards down to Carn Tuadham (607m) and Carn Meadhonach (588m) above Tomintoul.
- 3.41 Using the viewpoint 17, para 9.217 of the ES and ZTVs to discuss the impacts, for most of this area in the National Park, where the wind farm would be partly visible, the blades of up to 12 turbines would be visible, but not the hubs north of the A939, whereas south of the A939, generally the hubs of up to 12 turbines (blades of up to 24 turbines) would be visible. The ZTVs (ES Figure 9.5d & 9.6) show the actual extent of the turbine visibility because there are no local screening effects from woodlands or micro-topography in the Hills of Cromdale.
- 3.42 Most views from the tops are surprisingly panoramic given the lower elevation of the Cromdales relative to higher hills to south and east. All directions of the views are important because those in a generally southward direction towards the Cairngorm massif are complemented by views generally eastwards and westwards across the glens to further hills, and northwards towards the very distinctive shape of Ben Rinnes. The ES (para 9.435 - 436) recognises that the viewpoint is in the National Park and in the AGLV. It acknowledges that views are attracted in a northerly direction towards the wind farm site, but these views are not considered to be 'secondary', as described in the ES. Neither are the Hills of Cromdale 'marginal' to the National Park or the Cairngorms massif (ES paragraph 9.438), they are an integral part of the Park and characteristic of its landscapes; views are typical of those enjoyed in many of the higher and remoter parts of the Park; the ES recognises the physical link between these hills and the central massif. As described in paragraph 3.12 above, the whole Park is of outstanding national importance, parts of it cannot be diminished as 'marginal' (see further CNPA 5).
- 3.43 The ES at paragraph 9.438, states that the Hills possess a sense of remoteness on account of their elevation and distance from the nearest public roads and settlement; but the extent to which this is compromised by the presence of tracks, grouse butts and muirburn patterns, is over-stated.

- 3.44 In some light conditions the movement of the two separate groups of 2 – 3 turbines would attract the eye, on the skyline, the effects shown on the viewpoint wireline would increase further south and although at an increased distance, more of the proposed wind farm would become visible.
- 3.45 Construction impacts on the Hills of Cromdale would be negligible, but the ES assignment of negligible significance for the operational impacts of Dorenell from these hills is not agreed. The sensitivity should be high, as described above. The magnitude of change would, of course, vary across the Hills, as described above, from negligible to moderate (a noticeable change to important landscape characteristics and sensitive views).
- 3.46 Currently the Paul's Hill wind farm is visible at 10.5km from the northern part of the Hills of Cromdale. The consented Berry Burn wind farm will be visible at 14.7km and the consented Kildrummy and Drummuir wind farms will be visible at about 29km and 27km respectively. Figure 14 of the SEI also indicates that Rothes wind farm is visible from some of the Hills of Cromdale but is not visible from the viewpoint. Dorenell would make a further contribution to the negative impacts of baseline wind farms visible from the Hills of Cromdale, north of the A939.
- 3.47 From one of the hills above Tomintoul, Clashindarroch would also be visible if permitted, and together with Dorenell both proposed wind farms would add to the negative cumulative impacts of wind farms visible from the Hills of Cromdale, north of the A939.

### **Glen Avon to the Lecht Road**

- 3.48 The area between the river Avon and the Lecht road is part of the North Eastern Hills landscape character area in the Cairngorms NP LCA of 2009, described on pages 367 – 370. In the 1996 LCA the hills are also part of the more extensive area of North Eastern Hills (Area 6). Relevant characteristics include the massive and spectacular land form and heather clad summits and slopes; a complex, highly distinctive, generally remote, landscape which is secluded in the glens and exposed on the tops. There is a tremendous sense of space and openness linked to great distance, on the upper slopes and ridges, from where there are panoramic and often spectacular views. The area exhibits a strong sense of wildness (see CNPA 4). These hills are the focus of the skiing activity and access to the hills from the Lecht ski centre and are therefore used by many thousands of visitors each year.

- 3.49 The sensitivity of the landscape is high, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).
- 3.50 The sensitivity of visual receptors in this area is undoubtedly high, being high mountain and hill tops specifically visited for their scenic views, skiing and other forms of outdoor recreation, and the enjoyment of the natural environment and heritage and where the qualities of wildness, peacefulness and tranquillity are strongly experienced in a location with a strong sense of place (see Table 2.2 CNPA 2).
- 3.51 To the east of Glen Avon to the Lecht, between 1 and 36 turbines would be visible to blade tip (1 – 24 hub height) from all of the main summits including Liath Bheinn (664m), Craig Veann (711m) Monadh Fergie (576m), Carn Breac, Carn Ealasaid (792m) and Beinn a Chruinnich (778m), at distances of about 19km to 13km, and about 13km from the Lecht ski tows (ES Figures 9.4, 9.5g, 9.5h and 9.6). The ES does not assess the visual impacts on these hills and there is no viewpoint. The magnitude of change would vary between Glen Avon and the Lecht, from negligible in some parts to substantial in others, generally increasing as the distance to Dorenell decreases. There would be a significant impact on the enjoyment of the National Park.
- 3.52 Paul's Hill is visible from several of the summits and high slopes, at a distance of about 25km to 30km (Figure 13 SEI). The consented Kildrummy wind farm will be visible from Carn Ealasaid at about 20km (Figure 12 SEI). Dorenell would make a further and very significant contribution to the negative impacts of wind farms visible from the summits and slopes from Glen Avon to the Lecht, especially because of its scale and nearer location. Cushnie would be visible, if consented, at about 25km (Figure 10 SEI) and together with Dorenell both proposed wind farms would add substantially to the negative cumulative impacts of wind farms visible from these important hills.

### **Between the Dee and the Don (including Morven)**

- 3.53 The area of the National Park affected between the Dee and the Don, is part of the North Eastern Hills landscape character area in the Cairngorms NP LCA of 2009, described on pages 367 – 370. In the 1996 LCA the hills are also part of the more extensive area of North Eastern Hills (Area 6). Relevant characteristics include the massive and spectacular land form and heather clad summits and slopes; a complex, highly distinctive, generally remote, landscape which is secluded in the glens and

exposed on the tops. There is a tremendous sense of space and openness linked to great distance, on the upper slopes and ridges, from where there are panoramic and often spectacular views. The area exhibits a strong sense of wildness (see CNPA 4).

- 3.54 At distances of between 15km and 20km there would be views of blade tips of up to 48 turbines (up to 36 hubs) from the north facing slopes and summits of hills between the Don and the Dee, above Strathdon (locally some views would be screened by forestry) (ES Figures 9.4, 9.5h and 9.6). The viewpoints would include Scraulac, Cairn Mona Gowan, the Slacks of Glencalvie and the popular summit of Morven (Viewpoint 10). The viewpoint on Morven is the most distant of these views at about 23km. From Morven, the views are 360 degrees and are panoramic and varied. Views to the north are not secondary as asserted in para 9.347, they are part of the wide panorama, all aspects of the view are important.
- 3.55 Other parts of the National Park shown on the ZTVs in this area are on the north facing slopes so, self evidently, the main views are northwards towards the proposed wind farm. The area is remote and enjoyed for its dramatic scenery and hill walking opportunities. The assignment in the ES, at paragraph 9.351, of only medium sensitivity for this viewpoint is not agreed. Such an assignment is inconsistent with the approach adopted as explained in Topic Paper CNPA 2.
- 3.56 The sensitivity of the landscape is high, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).
- 3.57 The sensitivity of visual receptors in this area is undoubtedly high, being high mountain and hill tops specifically visited for their scenic views and the enjoyment of the natural environment and heritage and where the qualities of wildness, peacefulness and tranquillity are strongly experienced in a location with a strong sense of place (see Table 2.2 of CNPA 2).
- 3.58 Using the viewpoint to discuss the impacts from this part of the National Park, contrary to the assertions in the ES at paragraphs 9.352 – 355, the proposed wind farm would appear as a prominent feature in good visibility (when people enjoy the views most) sprawling over a lengthy stretch of the hills. Some turbines would be seen in front of the skyline, some on it and some partly behind it; they would bear no resemblance to other features in the landscape (such as forest blocks or settlements) except the other

wind farms. The visual image of the wind farm would be complex, incoherent and incongruous.

- 3.59 The construction impacts would not be significant, but the ES assignment of moderate significance for the operational impacts from Morven is not agreed. The sensitivity should be high. The impact magnitude is clearly moderate, the moving blades of the turbines of this large wind farm, on and around the skyline, at only 22.8km, would attract attention and detract from the panoramic views enjoyed from these hills.
- 3.60 The ZTV at Figure 8 of the SEI shows Cairnmore visible at about 23km. SEI Figure 49 shows that the consented Kildrummy will be visible at 16.8km. Dorenell would make a further and significant contribution to the negative impacts of baseline wind farms visible from the summits and slopes between the Dee and the Don, especially because of its scale and location. Drummuir and Myreton do not contribute to the cumulative effect at distances of 41.7 and 54.5km respectively. If permitted, Cushnie would be visible at about 12km, Clashindarroch would be visible at 25.8km; Dorenell would add substantially to the negative cumulative impacts of baseline and proposed wind farms visible from these important hills.
- 3.61 The operation of the Dorenell wind farm would have a significant negative impact on the enjoyment of important hills in the National Park between the Don and the Dee, including the popular summit of Morven. Dorenell would be the most significant addition to potential cumulative effects, of all proposed wind farms, owing to its wide spread across the hills and its impact on the skyline.

### **North of Glen More**

- 3.62 The hills north of Glen More separate Glen More from Abernethy Forest, locally referred to as the Mealle a' Bhuachaille ridge. They straddle and lie within two landscape character areas in the Cairngorms NP LCA 2009 and exhibit characteristics described in each of the two areas, namely Glen More, described on pages 83 – 86, and Abernethy Forest described on pages 103 – 106. In the 1996 LCA they are part of the North Eastern Hills, Area 6. Relevant characteristics include the massive land form of the enclosing hills, in juxtaposition with the central massif; the natural character of the hills and forest; and the panoramic views.

- 3.63 The sensitivity of the landscape is high, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).
- 3.64 The sensitivity of visual receptors in this area is undoubtedly high, being high mountain and hill tops specifically visited for their scenic views and the enjoyment of the natural environment and heritage and where the qualities of wildness, peacefulness and tranquillity are strongly experienced in a location with a strong sense of place (see Table 2.2 CNPA 2). There is a 'Core Path' specifically visiting and traversing the summit of Mealle a' Bhuachaille (Viewpoint 16), where path works have had to be carried out to remedy the effects of high levels of use. This is one of very few high level core paths outwith the central massif (see Map 16, page 29 **CNPA 15**).
- 3.65 From the hills to the north of Glen More, including the summits and north-eastern slopes of Craiggowrie (687m), Creagan Gorm (732m) and Mealle a' Bhuachaille (810m) (Viewpoint 16), the blades of over 13 turbines (hubs of up to 12) will be seen in good visibility between 32km and 36km (ES Figures 9.4, 9.5g and 9.6). These distances are at the limit of those from which significant effects are likely to be experienced but, like the central massif, these hills are of high sensitivity, being probably the most accessible of the high tops from Glen More to hill walkers who do not wish to climb to the Cairngorm summits. This is acknowledged in the ES (at 9.419).
- 3.66 The operation of the Dorenell wind farm alone would have a significant negative impact on the enjoyment of important summits and upper slopes of the National Park north of Glenmore. The ES records that the sensitivity of the viewpoint is high, and the impact magnitude of Dorenell on its own would be slight. The difference between the ES and this assessment is in how significance is attached to the combination; in this approach it would give a moderate (significant) level of significance (CNPA 2 Table 2.5 and see also the summary tables at the end of this paper), whereas the ES assigns slight significance. As with the views from the central massif, discussed below, these are examples of where relatively low levels of change to landscapes and viewpoints of the highest sensitivity can be significant.

- 3.67 The ES also records how Paul's Hill and Farr wind farms are visible from the viewpoint, the former on a midground landform horizon and about 31km from the viewpoint, a similar distance to that of Dorenell. The wind farms are not in the same direction as the views of the Cairngorm massif, but there are important 360 degree panoramas.
- 3.68 The effects of constructing Dorenell in addition to the wind farms already visible in these views would be significant. Figure 37 of the SEI shows the cumulative effects. Clashindarroch or Rothes do not make a significant contribution to the cumulative effects of wind farms from these hills, being over 46 and 42km away respectively. However, if permitted, Tom nan Clack and Glenkirk would be visible in the same general direction (northwards) and the addition of Dorenell would 'spread' wind farms across the distant horizon.

### **The Cairngorms Massif**

- 3.69 The Cairngorms Massif is described as a distinct landscape character area in the Cairngorms NP LCA of 2009, at pages 391 – 395. It is also a separate landscape type and one of two areas of plateau in the 1996 LCA (Area 1). It is a large area forming the core mountain massif of the National Park. The parts most affected include summits to the east of Ben Macdui, including Beinn a Bhuid, the Ben Avon ridge and summits to the north of Glen Avon. Relevant characteristics include the massive, bulky mountains rising to over 1300m, their open, exposed, often boulder strewn summits with blocky tors, above towering cliffs, deep troughs, dramatic corries, scree slopes and lochans of international importance for their dramatic geology. The summits have an arctic-alpine mountain environment, but the whole area is a landscape of considerable natural diversity, dominated by natural forces. These are relatively inaccessible landscapes, where the remoteness is heightened by the exposure and unpredictability of the weather, and the rugged terrain and long travelling distances on foot. The mass and naturalness of the mountains reinforces the sense of isolation. The massif exhibits a high degree of wildness (see CNPA 4). The spectacular, panoramic views are 360 degrees.
- 3.70 The sensitivity of the landscape is high, being in a designated National Park, a landscape that is clearly valued and enjoyed, a distinctive landscape with historical continuity, retaining a high level of integrity of character and which is in good condition (see Table 2.1 of CNPA 2).

- 3.71 The sensitivity of visual receptors in this area is undoubtedly high, being high mountain and hill tops specifically visited for their scenic views and the enjoyment of the natural environment and heritage and where the qualities of wildness, peacefulness and tranquillity are strongly experienced and where cultural associations are important in a location with a strong sense of place (see Table 2.2 of CNPA 2). Two 'Core paths' cross the area, namely CC 3 and CC 4 shown on Map 2, page 17 of **CNPA 15**.
- 3.72 Views of the proposed wind farm would be seen from a series of summits (Munros) and upper, north facing slopes from Beinn a Chaorruinn (1082m) in the Cairngorm group, close to the 35km extent of the ZTV; North Top (1197m) in the Beinn Bhuid group; across Cnap a Chlierich (1172m) and other summits above 1100m, in the Ben Avon ridge group, between 24km and 33km, to Meall Gainimh (ES Viewpoint 12) at about 24km from the wind farm. In most of these views up to 48 blade tips (up to 36 hubs) would be visible (ES Figures 9.4, 9.5g and 9.6).
- 3.73 Between Glen Avon and Glen Loin, up to 24 hubs (up to 48 turbines to blade tip) would be visible from the hills including Big Garvoun (742m) and Little Garvoun (721m) and the St John's Cairn group (Carn na Feannaige) (713 – 730m), at distances between 23 and 27km.
- 3.74 Using the viewpoint to discuss the impacts from this part of the National Park, contrary to the assertions in the ES at paragraphs 9.385 – 390, the proposed wind farm would appear as a noticeable and sometimes relatively prominent feature in good visibility. It is of course in good visibility that hill walkers will most enjoy the views that reward these challenging climbs. The views are breathtaking, panoramic and dramatic, from, amongst and across some of the finest mountain scenery in the UK. Although Viewpoint 12 is closer to the wind farm than most of these other areas, somewhat fewer turbines would be visible, about 30 according to the ES. This is still of course a substantial scale wind farm.
- 3.75 Whilst it is accepted that today the eye is drawn at this viewpoint to the massive mountain features broadly to the west, towards the Cairngorm massif and the ridge of Ben Avon, the appearance of the wind farm in a more north-easterly direction would distract the eye and draw attention to the proposed development. At this distance and with this angle of view to the proposed wind farm it is likely that Dorenell would be seen as a collective group feature, but it would present a confused image with

turbines at varying elevations, in front of and behind the skyline and disrupting the uninterrupted flow of the skyline.

- 3.76 Whilst it would not destroy the strong sense of wildness of this landscape, it would detract from it, because of its location on the skyline and the scale and nature of the development being at variance to other, more natural human influences visible from the hill tops (most settlement is not visible from the high tops, being confined to the hidden parts of the glens).
- 3.77 Construction impacts would not be significant, but the ES assignment of slight significance for the operational impacts from these high tops, particularly on the Ben Avon ridge and north of the River Avon, is not agreed. The sensitivity is agreed to be high. The impact magnitude is slight bearing in mind the distance, the orientation and scale of the landscape panorama and the relatively compact grouping of the turbines, but the moving blades of the turbines of this large wind farm, on and around the skyline, at about 26km, would attract attention and detract from the panoramic views enjoyed from these hills.
- 3.78 The operation of the Dorenell wind farm would have a significant negative impact on the enjoyment of significant summits and upper slopes of the National Park from parts of the central massif across to and including the Ben Avon ridge, and north of the River Avon.
- 3.79 At present, of the existing, permitted and proposed wind farms to the north of the National Park, only Paul's Hill is visible from the summits of the Ben Avon ridge at about 35km; it is also visible from the summits north of the River Avon at around 30km (Figure 13 SEI). However, Kildrummy will be visible at about 29km from the Ben Avon ridge. Dorenell would be a significant addition to the cumulative effects of baseline wind farms on the central massif, especially bearing in mind its scale and proximity, in places less than 24km. If permitted Cushnie would be visible at 30 to 35km and Clashindarroch would also be visible at 35km. Dorenell would be the most significant addition of all these proposed windfarms, in any permutation.

### **Impacts on views of the National Park**

- 3.80 It is acknowledged in the ES (e.g. para 9.450) that the mountains of the National Park form an important, often dominant focus for views from a wide range of viewpoints around the Park, for example, Ben Rinnes (viewpoint 18), Tap o' the North (viewpoint 6). Views of the National Park are also important from routes to the north, including the

A941 and other routes along which visitors approach the National Park. In this way the landscapes of the National Park often form the back-drop to every-day life and can be enjoyed by many thousands of people on a daily basis, as well as by travelers and visitors. Impacts of the proposed wind farm on these views will be dealt with in more detail by others, but the proposed wind farm would intrude into some of these views and would detract from the enjoyment of the views of the hills of the National Park.

## **Conclusions**

3.81 It will be seen from the above analysis that the seven broad areas of the National Park listed in paragraph 3.1 at the beginning of this analysis, and in Tables 3.1 and 3.2 below, would be significantly and adversely affected. The overwhelming impact on the Ladder Hills and the highly intrusive effects of the proposal on the Braes of Glenlivet would be greatest in terms of the size of the turbines, scale and proximity of the wind farm to the National Park. But impacts on the Hills of Cromdale, Glen Avon to the Lecht and between the Dee and the Don would also be significant, bearing in mind the scale of the proposal and the distance from highly sensitive areas of the National Park. Whilst the central massif and hills north of Glen More are more distant, the scale of the proposal is so great that it would impinge on the enjoyment of these areas and their special qualities in ways that are clearly significant (see further CNPA 5).

## **Summary Tables**

3.82 The following tables summarise the assessments set out in this paper for the CNPA. Table 3.1 deals with the impacts on the landscape resource, including landscape character and the special qualities of the National Park. Table 3.2 deals with the impacts on visual amenity, including the enjoyment of the National Park. Both tables include the equivalent assessments for the landscape types and viewpoints in the ES. Tables 3.1 and 3.2 deal with the impacts of Dorenell on its own. Table 3.3 summarises the cumulative effects of the proposal on visual amenity of the National Park.

**Table 3.1**  
**Impacts on the Landscape Resource**  
**(including landscape character and the special qualities of the National Park)**

Area of the National Park / Viewpoint	Sensitivity		Magnitude (maximum in the area)		Significance (of max magnitude)	
	ES	CNPA	ES	CNPA	ES	CNPA
Ladder Hills / Simple Upland Plat & Hills VP 11 VP11a	High	High High High	High	Substantial Substantial Substantial	Substantial	Major Major Major
Braes of Glenlivet / Straths & Glens (Glen Livet) VP 14	Medium	High High	Low	Substantial Slight	Slight	Major Moderate
Hills of Cromdale / VP 17		High High		Moderate Slight		Major Moderate
Glen Avon to the Lecht		High		Substantial		Major
Dee – Don / Morven VP 10		High High		Moderate Moderate		Major Major
N of Glen More VP 16		High High		Slight Slight		Moderate Moderate
Central Massif / Cairngorms Plateau VP 12	High	High High	Low	Slight Slight	Slight	Moderate Moderate

**Table 3.2**  
**Impacts on Visual Amenity / Enjoyment of the National Park**

Area of the National Park / Viewpoint	Sensitivity		Magnitude (maximum in the area)		Significance (of max magnitude)	
	ES	CNPA	ES	CNPA	ES	CNPA
Ladder Hills VP 11 VP11a	High High	High High High	High High	Substantial Substantial Substantial	Substantial Substantial	Major Major Major
Braes of Glenlivet VP 14	High	High High	Low	Substantial Slight	Slight	Major Moderate
Hills of Cromdale VP 17	Medium	High High	Negligible	Substantial Slight	Negligible	Major Moderate
Glen Avon to the Lecht		High		Substantial		Major
Dee – Don / Morven VP 10	Medium	High High	Low	Moderate Moderate	Moderate	Major Major
N of Glen More VP 16	High	High High	Low	Slight Slight	Slight	Moderate Moderate
Central Massif VP 12	High	High High	Low	Moderate Moderate	Slight	Major Major

**Table 3.3  
Cumulative Impacts on Visual Amenity / Enjoyment of the National Park  
Adding Dorenell to baseline and other proposed wind farms to areas of the National Park  
significantly affected by the proposal**

Area of the National Park	Sensitivity		Magnitude (maximum in the area)		Significance (of max magnitude)	
	ES	CNPA	ES	CNPA	ES	CNPA
Ladder Hills: Addition to baseline Addition to proposed Simple Upland Plat & Hills: Addition to baseline Addition to proposed		High High		Substantial Substantial		Major Major
	High High		Low Low		Slight Slight	
Braes of Glenlivet: Addition to baseline Addition to proposed Straths & Glens (Glen Livet): Addition to baseline Addition to proposed		High High		N/A N/A		N/A N/A
	Medium Medium		Low Low		Slight Slight	
Hills of Cromdale: Addition to baseline Addition to proposed		High High		Moderate Moderate		Major Major
Glen Avon to the Lecht: Addition to baseline Addition to proposed		High High		Substantial Substantial		Major Major
Dee – Don / Morven: Addition to baseline Addition to proposed		High High		Moderate Moderate		Major Major
N of Glen More: Addition to baseline Addition to proposed		High High		Moderate Slight		Major Moderate
Central Massif: Addition to baseline Addition to proposed Cairngorms Plateau: Addition to baseline Addition to proposed		High High		Moderate Moderate		Major Major
	High High		None Negligible		None Negligible	