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Date : 16 August 2016
Our Ref : 16NP0071CO
Your Ref : 16/00810/FUL
Contact : Rebecca Adams
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Dear Ms Hayward,

Proposed development: ENVIRONMENTAL ASSESSMENT
CONSULTATION 16/00810/FUL - Erection of wind
farm comprising of 11 turbines 176m high to tip, 2
turbines 150m high to tip and associated works.

Location: Land South West Of Lustruther Farmhouse
(Highlee Hill), Hawick, Scottish Borders

Northumberland National Park Authority has considered the above
development and wishes to object based on the following comments:

The centre of the development site is located approximately 4km south of the hamlet of Chesters, approximately 14.7km south east of Hawick and 6.9km west from the boundary of Northumberland National Park at Carter Bar. The site is predominantly occupied by coniferous forestry plantation with one turbine being located on the lower lying mixed agricultural land to the north. The extensive conifer forest forms part of the northern extent of Wauchope Forest. As with most conifer forests, there are numerous compartments comprising trees at different stages of growth from recently clear-felled ground, newly planted trees, young un-thinned stands through to mature trees. The turbine bases would lie between 219m and 298m above sea level with the highest point of the development site being the northern slopes of Scrathy Holes (521m) lying to the south and the site falls away to the north and the A6088 Hawick to Carter Bar road.

The final choice of turbines will be dependent upon detailed design work and market availability but for the purpose of the Environmental Impact Assessment undertaken it is understood that they will comprise three blades mounted upon a tapering or cylindrical tubular steel tower. Figure 4.5 implies that the hub heights for the two different types of turbines will be either 91.5m or 117.5m and the applicant suggests that the tower, hub and turbine blades will be coloured to a specification yet to be agreed.



In order to ascertain the likely effects of the proposed development on the landscape character and views of an area a process of Landscape Visual Impact Assessment (LVIA) has been developed. The process is used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity. Judgments are made on the sensitivity of landscapes and views affected by the impact, the value placed upon them and the size, scale, duration and reversibility of effects resulting from the proposed development.

This assessment focuses on the potential effects of the development on the landscape character and views both into and out from Northumberland National Park. This is a national designation but is overlapped to the south by the Hadrian's Wall World Heritage Site, an internationally acclaimed landscape. The special qualities associated with Northumberland National Park include its distinctive landscape character, a landscape rich in biodiversity, geodiversity, cultural heritage, with a true sense of tranquillity and dark skies. The Park is predominantly an upland farmed landscape with a mosaic of natural and semi-natural habitats. The landscape itself and the appreciation of it are extremely sensitive to large scale development and the aesthetic appeal is treasured and valued by many who live in and visit the National Park.

A development such as Highlee Hill, comprising 11 no. wind turbines within relatively close proximity of the National Park is regarded as a substantial infrastructure development. Paragraph 115 of the National Planning Policy Framework states that '*Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Beauty, which have the highest status of protection in relation to landscape and scenic beauty*'. In assessing the possible effects on landscape character and views into and out from the National Park consideration is also given to:-

- Visitor's perception of the National Park landscape, particularly in those character areas having sight of the development;
- The setting of the National Park and its place within the wider Northumberland and Scottish Borders Landscape;
- Visitor's understanding and enjoyment of the National Park, for example when driving on a road or using a public right of way or visiting a scheduled ancient monument, and at the same time, having sight of the development.



To assess the magnitude of the landscape effects, the number, size and location of the wind turbines need to be considered in context to the landscape character and the setting of the development. Consideration also needs to be given to the duration and reversibility of the landscape effects derived from the proposed development.

The table below identifies the National (as identified by Natural England) and local landscape Character Areas that the development lies within and also those that it is likely to directly affect.

	National Character Area	Character Type	Landscape Character Area
Site Located outside the Park In	<ul style="list-style-type: none"> The Borders 	<ul style="list-style-type: none"> Sothern Uplands Forest Covered 	<ul style="list-style-type: none"> Wauchope Forest
	National Character Area	Character Type	Character Area
Visible from these areas within the National Park	<ul style="list-style-type: none"> Cheviots Border Moors and Forests 	<ul style="list-style-type: none"> Foothills and Fringe Valleys Rounded Hills Rolling Uplands Moorland Forestry Mosaic 	<ul style="list-style-type: none"> Northern Hills, Bowmont Water and Glendale Cheviot Rounded Hills Cottonshope Valley Kielder, Wark and Redesdale Forest

Northumberland National Park Authority has additionally produced a Landscape Supplementary Planning Document (SPD) in which it identifies the key characteristics of the 12 identified local landscape character types. Whilst the proposed development does not fall within the National Park, the landscape character types that the submitted ZTV suggests will be affected by the development are set out as follows, along with the respective guidelines for development:-

Foothills and Fringe Valleys: Northern Hills, Bowmont Water and Glendale *Man-made vertical structures which detract from the rounded landform of the outlying hills that define the fringe valleys should be avoided, particularly where they would adversely affect views from within the National Park.*



Cheviot: Rounded Hills

Man-made vertical structures which detract from the open and rounded landform, or adversely affect uninterrupted skylines and unbroken panoramic views, should be avoided. Care should be taken to prevent landscape and visual impacts associated with wind farm development, whether in Scotland or England, where it may adversely affect the special qualities and setting of the National Park.

Rolling Uplands: Otterburn Plateau

New development should not be visually prominent and should not detract from the landscape quality of the area. Any development of communications masts or other tall structures on the open exposed ridgelines of this landscape should be avoided as it could lead to visual clutter and loss of tranquillity as this landscape is highly sensitive visually due to its open character.

Moorland Forestry Mosaic: Redesdale Forest

Wind farm development proposals (either in Scotland or England) should avoid adverse impact on this expansive upland landscape and the setting of the National Park.

The ZTV map identifies that this proposed development will be visible from two of the National Character Areas that cover the National Park and numerous locations within these, including roads, scheduled ancient monuments, other historic sites, the Pennine Way National Trail, other promoted routes, public rights of way and access land. In addition the proposed development will have an effect upon the setting of the National Park when viewed from various sites outside the National Park looking back in, i.e. in cases where the distinctive high ground of the National Park, in this case the Border Ridge, forms the backdrop to a view.

Appreciating the landscape as it is today is one thing but knowing how the landscape has evolved is fundamental to the value and appreciation that people associate with it. Thus there is a need to identify and understand the historic landscape character and the natural and cultural heritage influences that have shaped it. In this case consideration should be given to the geodiversity of the National Park, and the human activity that has subsequently left its mark on the landscape. The Border Ridge, Cheviot, Deer Street and Russell's Cairn on the Pennine Way are some of the most obvious examples to consider with this application.

In relation to the timescale of the Highlee Hill proposals it is acknowledged that there will be three phases to this development covering a time period of up to



32 years, namely construction, operation and decommissioning. Whilst noted, it is not thought that there will be a significant effect on the special qualities of the National Park during the early construction or latter decommissioning phases of the project due to the temporary, short-term nature of this work. Whilst lifting cranes will be involved, the effect of the project on the landscape is likely to become noticeable and regarded as long-term between the erection of the first turbine and dismantling of the last. Work undertaken before and after these points in time is not likely to have a significant effect on the landscape character of the National Park or views into or out from the National Park due to topography and distances involved. It is noted that the effects on the landscape character of the National Park are largely reversible after 32 years, should the turbines be dismantled and removed from site.

As a nationally important landscape designation highly valued by locals and visitors alike, the areas of the National Park that would be affected by this development are deemed to be of high sensitivity. At present, there are no existing man-made vertical structures of a similar size or scale in the vicinity of Highlee Hill; as such the proposed development would be out of keeping with the exposed upland farm and afforested landscape currently viewed from the border ridge. It is acknowledged that wind turbines are increasingly becoming a feature of many upland landscapes these days but this being the case, the views gained from England's first long distant National Trail that runs along the Border Ridge are treasured by many and the unfettered nature of the surrounding landscape is becoming increasingly rare. The effect of the turbines when viewed from the Pennine Way at Black Hills (as shown by Fig. 4.14d of the Environmental Statement) is particularly dramatic and it is considered that the introduction of the turbines would be a visually prominent addition to the features and characteristics within the landscape. The Border Ridge is identified as the most sensitive landscape receptor within the National Park that is likely to experience the greatest magnitude of change as a result of this proposed development with the effect generally increasing the nearer one gets to Carter Bar when travelling along the ridge in a south westerly direction.

The ZTV indicates that the proposed development at Highlee Hill will be visible from sites such as the Cheviot Plateau (31.0km) and sites along the Pennine Way north east of Lamb Hill (18.9km) as indicated in figure 4.5 of the Environmental Statement. However, the distances between these receptor sites and the development mean that the turbines are likely to be seen on the horizon, and even then blade movement is unlikely to be discernible with the naked eye at these distances. There will not be a significant effect upon the views out from the National Park from these locations or access land in-between. However for closer sites such as at Black Halls, (15.9km) the



magnitude of change will be greater and significance increase, particularly because the development will be looked down upon and set against the dark conifer background of Wauchop Forest (see picture 4.14d).

As figure 4.29f within the Environmental Statement identifies, for Pennine Way walkers travelling in a south-westerly direction from the summit of Cheviot, along the 22km Border Ridge, the Highlee Hill development will lie directly in front of them for much of the way and the significance of the effect would increase the nearer to the development one got. This alignment of the proposed development with the Pennine Way would exacerbate the effect that this proposed development would have on the views gained from the Pennine Way as one's eye is naturally drawn to views directly ahead as opposed to those set off to one side.

The proposed development will have a significant effect upon the views looking out from the National Park, particularly at locations along the Pennine Way on the Border Ridge such as at Black Halls.

As previously identified there are no similar significant man-made vertical structures currently in the Highlee Hill area (the nearest wind farm scheme currently approved is thought to be that at Windy Edge some 14.4km to the south west). As such it is unlikely that there would be a significant cumulative effect on the landscape or views with other schemes currently approved. This therefore reinforces the fact that this proposed development would be the first, if approved, to significantly affect the unfettered skyline and views of this part of the Scottish Borders and sensitive views out from the Northumberland National Park.

However, I do believe that there would be a significant cumulative effect should the schemes currently known to be at the pre-application stage of the planning process, specifically with the proposed 50 turbine scheme at Wauchope Forest East (748m) and the 20 turbine scheme at Wauchope Forest West (3.7km). The cumulative effect of all three developments being approved would result in the landscape character of Wauchope Forest being one dominated by wind turbines rather than the dark forestry mosaic landscape currently present.

It is therefore considered that there would be significant effects on both the landscape character and views out from the National Park, in particular from the Pennine Way National Trail and other sections of the Border Ridge.

Northumberland National Park Authority therefore objects to the proposed development.



The methodology of the Landscape Visual Impact Assessment fails to accord with the recommendations set out within Paragraph 52 of the Scottish Natural Heritage 'Visual Representation of Wind Farms' guidance (available to view online [here](#)) under which it is advised that a ZTV of 45km is undertaken for turbines exceeding 150m in height, as the ZTV submitted only incorporates a distance of 40km. That the application only considers the effects of the proposed development within a study area of 40km rather than 45km indicates that the full effects of the development have not been fully identified or assessed.

Yours sincerely,

R. Adams

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Planning Officer

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