

Chapter 1: Introduction

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1.1. Preface

- 1.1.1. SSE Generation Limited (hereafter referred to as ‘the Applicant’) has submitted an application to the Scottish Ministers via the Scottish Government Energy Consents Unit (ECU) under Section 36C (‘the S36C application’) of the Electricity Act 1989 (‘the 1989 Act’). The S36C application proposes to vary the Section 36 consent granted by the Scottish Ministers on August 2022 for the construction and operation of the Bhlaraidh Wind Farm Extension (the ‘Consented Development’). This variation to the Consented Development will be referred to as the “Proposed Varied Development”. The site is located on the Glenmoriston Estate, north-west of Invermoriston in the Great Glen, within the Highland Council Local Planning Authority Area (refer to **Figure 1.1 Site Location Plan**).
- 1.1.2. The principal variation requested to the Consented Development is to increase the tip height of the 15 turbines from 180m to up to 230m with related minor changes to infrastructure. More detailed information regarding the Proposed Varied Development (PVD) is presented in Section 1.5 of this Chapter and in **Chapter 2: Design Iteration and Proposed Varied Development**.
- 1.1.3. In addition, the Applicant is seeks a variation under Section 36C of the Electricity Act 1989 and the Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013 to the Description of Development provided in Annex 1 of the Section 36 Consent for the proposed Bhlaraidh Wind Farm Extension, together with a direction under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997. In addition to seeking a variation to the Annex 1 Description of Development, the Applicant seeks variations to certain conditions contained in Annex 2 of the current Section 36 Consent and updated conditions to the requested grant of deemed planning permission to reflect the changes to the Description of the Development, and to update the current conditions. This application under Section 36C and Section 57(2) is hereinafter referred to as the “Variation Application”.
- 1.1.4. Relevant to Section 58(1b) of the 1997 Act, the Proposed Varied Development seeks to amend the implementation period from six to eight years from the date of the Consented Development Section 36 decision letter to allow adequate time to finalise the detailed design following consent and prepare and procure services and equipment ahead of construction commencement.
- 1.1.5. A copy of the S36C application will be served on the planning authority, The Highland Council (THC) and the owner and occupiers of the land to which the S36C application relates, in accordance with Regulation 4(2)(b) and (d) of the Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013, as amended (‘the 2013 Regulations’). The publication requirements of the same Regulation and Part 5 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (As

amended) (hereafter referred to as the '2017 EIA Regulations') will be complied with in relation to the EIAR, as further explained below.

- 1.1.6. The Consented Development has been subject to two previous design iterations over the life of the project, and the layout has evolved to respond to feedback from consultees and a collection of additional environmental data. The principal iterations are summarised in the following 2021 EIAR and 2022 Additional Information Report (AIR):
- 2021 EIAR for 18 wind turbines generators (WTGs); and
 - 2022 AIR to modify the scheme to 15 WTGs - the Consented Development layout.
- 1.1.7. This EIAR is provided in 5 volumes:
- Volume 1: Written EIA Chapters;
 - Volume 2: Non-LVIA EIA Chapter Figures ;
 - Volume 3a: Cultural Heritage & Landscape and Visual Figures (NatureScot methodology);
 - Volume 3b: Landscape and Visual Figures (The Highland Council Methodology);
 - Volume 4: Technical Appendices; and
 - Volume 5: Confidential Annex.
- 1.1.8. Additional documents that have been submitted with the S36C application include:
- Non-Technical Summary;
 - Planning Statement;
 - Maximising Socio-Economic Benefits Framework Report;
 - Pre-Application Consultation (PAC) Report; and
 - Cover letter.
- 1.1.9. This EIAR and other documents lodged in relation to the S36C application will be available to view on the Scottish Government's portal once validated:
<https://www.energyconsents.scot/ApplicationSearch.aspx>
- 1.1.10. In accordance with Regulation 4(2)(a) of the 2013 Regulations, application documents, including this EIAR, will also be available to view on the Applicant's website: [Bhlaraidh Extension | SSE Renewables](#)

- 1.1.11. The application and this EIAR will be advertised in the following newspapers, in accordance with the relevant legislative requirements under the 2013 Regulations and the 2017 EIA Regulations as follows:
- The Herald;
 - The Edinburgh Gazette; and
 - The Inverness Courier.
- 1.1.12. Hard copies of the EIAR will be made available for viewing at the following locations:
- The Highland Council Headquarters – Glenurquhart Road, Inverness, IV3 5NX;
 - Invermoriston Millennium Hall and Fort Augustus Village Hall as requested by Fort Augustus and Glenmoriston Community Council
- 1.1.13. The Applicant will work closely with the ECU to ensure all statutory consultees receive a physical copy of this EIAR upon request. In the interests of sustainability, reference to the paperless version is strongly encouraged. For anyone who has difficulty accessing the documentation online, hard copies of the EIAR may be obtained from SSE Generation Limited (contact: SSE Generation Ltd, FAO Onshore Development Team, 1 Waterloo Street, Glasgow, G2 6AY or OWSBSupport@sse.com) at a charge of £1,500 per copy, or £15 per disk/USB memory stick. Hard copies of a short Non-Technical Summary are available free of charge.
- 1.1.14. Any representations in respect of the application may be submitted via the Energy Consents Unit (ECU) website at www.energyconsents.scot/Register.aspx; by email to The Scottish Government, Energy Consents Unit mailbox at representations@gov.scot or by post, to The Scottish Government, Energy Consents Unit, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU, identifying the proposal and specifying the grounds of representation.
- 1.1.15. Written or emailed representations should be dated, clearly stating the name (in block capitals), full return email and postal address of those making representations. Only representations sent by email to representations@gov.scot will receive acknowledgement.
- 1.1.16. All representations should be received not later than the date falling 30 days from the date of the last published notice, although Ministers may consider representations received after this date. Any subsequent additional information which is submitted by the Applicant will be subject to further public notice in

this manner, and representations to such information will be accepted as per this notice.

1.2. Introduction & Background

- 1.2.1. The Applicant is submitting a Section 36C application to Scottish Ministers to vary the Section 36 consent granted on 30 August 2022 under the 1989 Act. The application also seeks a Section 57(2) direction for deemed planning permission and proposes amendments to certain conditions in Annex 2 to reflect changes to the Development description.
- 1.2.2. The application for the Consented Scheme was submitted to the Energy Consents Unit by the Applicant on 16th August 2021 and as stated above, subsequently approved on 30th August 2022. The Applicant was fully committed to commencing construction of the Consented Scheme, however, due to factors and challenges affecting the onshore wind industry, the project economics were considered unsuitable, and the project was put on hold. After a detailed project feasibility review, the Applicant has established that increasing the tip height of the Wind Turbine Generators (WTG) from the consented 180m up to a maximum of 230m would substantially increase the energy output from the site. This inevitably requires changes to hardstands and some minor access track modifications, and changes to turbine locations.
- 1.2.3. It is important to note that the Applicant has already completed the construction of the enabling works for the Consented Development. The extent of these enabling works is illustrated in **Figure 1.2: Site Layout Plan**. The Applicant has submitted a number of documents to satisfy planning condition requirements with The Highland Council ahead of the intended construction start on the Consented Development prior to the project being paused. A summary of the status of each planning condition, whether condition wording amendments are requested and S36C relevant condition satisfaction documents is included as **Technical Appendix 3.6: Planning Conditions Summary** and discussed further in **Chapter 3: Approach to EIA**. Documents which have been submitted to satisfy conditions and have supported the impact assessments for the Proposed Varied Development have been included in **Technical Appendices: 3.6a-i**.

1.3. Purpose of Report

- 1.3.1. This EIAR is provided under the 2017 EIA Regulations, with specific regard to the requirements of Regulation 28. The Proposed Varied Development is considered to fall under paragraph 3 of Schedule 2 to the 2017 EIA Regulations, as '*a change to or extension of*' an EIA development which has already been authorised (the relevant section 36 consent for the Consented Development). As a result, this EIAR presents a comparison of effects of the

Consented Development on the environment with the PVD, including any likely significant effects arising.

1.4. Needs Case and Benefits

- 1.4.1. The Proposed Varied Development is required because the Consented Development is no longer a commercially viable project in its current form. This is due to a wide range of economic challenges currently facing the Global onshore wind industry, including supply chain cost escalation, the significantly higher Transmission Network Use of System (TNUoS) costs in the North of Scotland, and the threat of zonal pricing. All of these factors together significantly increased the risk profile for the project.
- 1.4.2. Following a thorough internal review of the Consented Development's design, the Applicant decided to increase the project's energy yield by raising the height of the wind turbine generators (WTGs), enabling access to higher wind speeds and greater output.
- 1.4.3. Without the taller turbines, the Consented Development would not be commercially viable and would not proceed to construction. This would result in the permanent loss of the opportunity to establish a wind farm at this location, along with all the associated environmental and economic benefits.
- 1.4.4. The Proposed Varied Development would make an extremely valuable contribution to the achievement of the UK and Scottish Government '*whole system*' targets to decarbonise energy consumption by increasing the zero-carbon energy yield. The increased energy production would supply more homes with clean, renewable energy and an equivalent increase in CO₂ reduction, making a valuable contribution to the Scottish Climate Change Plan targets. This contribution is indeed greater than that of the Consented Development due to its higher MW capacity. Further details on the statutory and policy framework are provided in **Chapter 4: Planning Policy** and the standalone Planning Statement submitted alongside the S36C application.
- 1.4.5. A Maximising Socio-Economic Benefits Framework Report has been submitted to support the S36C application for the Proposed Varied Development which details how the project would bring a wealth of socio-economic benefits to the local community. These benefits include the creation of jobs and opportunities for local businesses and suppliers during the construction phase and for the lifetime of the project.

1.5. Consultation

- 1.5.1. A request for a Scoping Opinion was submitted to the Scottish Ministers on 13th May 2025, in accordance with Regulation 12 of the 2017 EIA

Regulations. The request was accompanied by the 2025 Scoping Report (**Technical Appendix 3.1: Scoping Report**), which set out a summary description of the Proposed Varied Development, identified the effects proposed to be included in the EIAR and proposed an approach to the assessment of impacts in each case. The 2025 Scoping Report was issued to relevant statutory and non-statutory consultees. A Scoping Opinion was provided by the Scottish Ministers on 16th July 2025, a copy of which, along with the consultation responses are presented in **Technical Appendix 3.2: Scoping Opinion** and **Technical Appendix 3.3: Further Scoping Consultation**). Further consultation was undertaken as part of the ECU gatecheck process and details of which are contained within **Technical Appendix 3.4: Gatecheck 1 Report** and **Technical Appendix 3.5: Post-Gate Check 1 Report Consultation Responses**.

- 1.5.2. There is no statutory requirement for pre-application consultation on Section 36C variation applications; however, the Applicant carried out two public consultation events in June and September 2025 and also a Community Council meeting with Fort Augustus and Glenmoriston Community Council in June 2025. Full details of these events and their outputs can be found in the Pre-Application Consultation (PAC) Report submitted to support the S36C application.

1.6. Proposed Variations to the Consented Scheme

- 1.6.1. The Proposed Varied Development comprises a generating station, consisting of a wind farm with 15 WTGs of up to a maximum height of 230m from ground to blade tip when vertical, supported by ancillary development. The total installed capacity of the Proposed Varied Development, whilst dependent on the rated power of the turbine model procured, is anticipated to be approximately 93-108MW.
- 1.6.2. The Applicant is seeking to vary the Description of Development as described in Annex 1 of the Consented Development Section 36 decision letter by changing the specification of the proposed WTGs as summarised in **Table 1.1** below:

Table 1.1: Comparison of the Description of Development between the Consented Development and Proposed Varied Development

S36 Consent (Annex 1 Description of Development)	S36c Proposed Variations
15 turbines each with a maximum blade tip height of up to 180m	15 turbines each with a maximum blade tip height of up to 230m. While the overall layout of the scheme is not substantially changed, due to the increase in tip height and resultant change to wake zones and increased safety buffer for topple distance, some turbines have necessarily been repositioned.
Crane hardstandings for each turbine	The size of the hardstands has increased to reflect the proposed candidate turbine model. Some hardstands have also been repositioned /reorientated to improve and reduce earthworks requirements and in response to turbine repositioning.
Approximately 7.9km of new access tracks	No change to the approximate length of the new track at approximately 7.9km. Some spurs will be longer, especially T10, but this is balanced against some shorter spurs (T16 + T05). Despite the larger turbines, there would be a minimal change to length of the new access track. (1.4km of access track was constructed in 2024 as part of the site enabling works).
Approximately 13.5km of existing access tracks	No change.
An onsite substation	No change. The substation platform has been constructed up to 275mm below final ground level (bFGL) as part of the site enabling works in 2024. The final 275mm profile and construction of the substation building and associated infrastructure is still to occur as part of the main works. The transformer configuration is expected to change slightly.
Eight turning heads	Nine turning heads to accommodate turbine supplier delivery requirements for larger components.
Up to eight borrow pit search areas;	Up to seven borrow pit search areas, two of which have been worked and reinstated during enabling works and shall not be reused during main works.
Two temporary construction compounds;	No change.
A single permanent LIDAR station;	No change.
A concrete batching plant	No change.
Six new access track water crossings	No change.
Two routes of cross country cabling approximately 700m and 1200m in length.	Slight amendment to two routes of cross country cabling approximately 730m and 1010m in length resulting in reduction of overall cable length.

- 1.6.3. Due to changes in the specifications and availability of potential candidate WTGs, the nominal maximum rotor diameter of the WTGs has changed from 158m assessed in the 2021 EIAR to 163m assessed in this EIAR. More detailed information regarding the rationale for the proposed variations is presented in **Chapter 2: Design Iteration & Proposed Varied Development**.
- 1.6.4. Figures to support this Chapter in describing the Proposed Varied Development and enable comparison with the Consented Development are presented in EIAR Volume 2 and summarised below in **Table 1.2**:

Table 1.2: Proposed Varied Development & EIAR Supporting Figures

Figure Title	Information Source	Comment
Figure 1.1 Site Location Plan	2021 EIAR	No Change from Consented Development Location Plan
Figure 1.2 Site Layout Plan	New information	Presents the proposed varied development within the turbine development area.
Figure 1.3 Wider Site Layout Plan	New information	Presents the wider layout plan area of the proposed varied development with operational site details
Figure 1.4 Varied Development vs Consented Development Layout	New information	Overlays the Proposed Varied Development vs Consented Development Layout for comparison.

1.7. Approach to EIA

- 1.7.1. This EIAR adopts a comparative assessment approach in line with the 2017 Regulations for variation applications. It builds on previous assessments (2021 EIAR and 2022 AIR) and evaluates the effects of the Proposed Varied Development against the Consented Development. Further detail on methodology, legislative context, and assessment structure is provided in **Chapter 3: Approach to EIA**.

1.8. Structure of the EIAR

1.8.1. The EIAR is split into five volumes with accompanying four standalone documents. These volumes are described in the following paragraphs.

1.8.2. Volume 1 of the EIAR is structured as follows:

Chapter 1	Introduction
Chapter 2	Design Iteration and Proposed Varied Development
Chapter 3	Approach to EIA
Chapter 4	Planning Policy
Chapter 5	Ecology & Nature Conservation
Chapter 6	Ornithology
Chapter 7	Archaeology & Cultural Heritage
Chapter 8	Landscape and Visual
Chapter 9	Hydrology & Hydrogeology
Chapter 10	Geology & Soils
Chapter 11	Noise & Shadow Flicker
Chapter 12	Traffic & Transport
Chapter 13	Socio-Economics, Recreation & Tourism
Chapter 14	Climate Change
Chapter 15	Aviation & Radar
Chapter 16	Schedule of Environmental Mitigation
Chapter 17	Summary of Residual Effects

1.8.3. Volume 2 of the EIAR contains Figures.

1.8.4. Volumes 3a and 3b contain the landscape and visual and cultural heritage figures and visualisations, split into NatureScot format and Highland Council format, respectively.

1.8.5. Lastly, Volume 4 contains the Technical Appendices.

1.8.6. Additional supporting documents which form part of the application submission include a Non-Technical Summary, a Planning Statement, a Pre-Application Consultation (PAC) Report, and a Maximising Socio-Economic Report.

1.8.7. A glossary of terms is also included at the front of this EIAR (Volume 1).

1.9. About SSE and the Applicant

- 1.9.1. SSE's purpose is to provide energy needed today while building a better world of energy for tomorrow. We do this by developing, building, operating and investing in electricity infrastructure and businesses needed in the energy transition. This includes electricity transmission and distribution networks, onshore and offshore wind farms, hydro-electric power and flexible thermal generation technologies. We also provide energy products and services for businesses and other customers. Our Transformation for Growth investment plan sees us investing £33bn in critical electricity infrastructure across the five years to 2030.
- 1.9.2. A FTSE-100 company headquartered in Scotland with operations across the UK and Ireland, SSE also has a presence in carefully selected international markets. We employ around 14,000 people and are a proud to be a 'real Living Wage' and 'Living Hours' employer and to be accredited with the 'Fair Tax Mark'. SSE was also the first company in the world to develop a 'Just Transition Strategy' aimed at ensuring the benefits of the clean energy transition are shared by workers and communities
- 1.9.3. The Applicant is part of SSE Renewables, the renewable energy arm of SSE plc, focused exclusively on delivering clean power through onshore and offshore wind and flexible hydro generation. With a vision to make renewable energy the foundation of a zero-carbon world, SSE Renewables leads the development, construction and operation of some of the UK and Ireland's most significant renewable projects, supporting SSE's wider strategy to accelerate the energy transition.
- 1.9.4. SSE Renewables operates one of the largest onshore wind energy fleets in the UK and Ireland, with almost 5GW of installed green energy capacity and another 2GW in construction. Their vision is to be a leading renewables company in a net-zero world with the aim of increasing their renewable energy output by ~40% over the next 2 years. SSE Renewables continues to progress development options for new onshore wind farms and extensions to existing wind farms and is well placed to take advantage of any future opportunities as they emerge.
- 1.9.5. SSE Renewables is committed to supporting local supply chains. Their Sustainable Procurement Code emphasises the importance of sustainable supply chains. A key principle of a promoting a sustainable supply chain to sharing economic opportunities with the people and businesses located close to their operations. As well as working with communities directly, the Applicant has a structured approach to engaging with its strategic suppliers with an expectation upon them to form constructive local relationships so that communities gain from the Applicant's significant capital investments. The Applicant recognises that it must be an active contributor to the local

communities and has an on-going commitment to share value where it is being created.

- 1.9.6. SSE Renewables' Community Investment Funds support a diverse range of community projects near their renewable developments. As part of the Sustainable Development Fund Highland, £800,000 was granted to deliver the Highland Energy Efficiency Programme in 2024/5 and 2025/26. In 2024/25 SSE Renewables invested over £12.9m supporting over 800 projects in communities across the UK and Ireland, this brings the Applicant's total investment in communities over the past six years to around £100m.
- 1.9.7. The Applicant develops great sites, undertakes excellent construction, has strong relationships with suppliers and has extremely high standards of operation.