

Achany Extension Wind Farm Section 36C Application

Technical Appendix 3.3: Further Consultation



[EXTERNAL] RE: Achany Extension Wind Farm Scoping Response Further Clarifications 01 October 2025 09:10:35

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Report Suspicious



Apologies for the slow reply and thanks for chasing up. Have spoken with my colleague in transport planning, and it is understood the original consent will have details of a transport assessment and that transportation and traffic can be scoped out, as road mitigation measures are already in place to manage the road network within the consented application.

Kind regards,



Infrastructure, Environment and Economy

Email

Infrastructure, Environment and Economy
The Highland Council
Glenurquhart Road
Inverness
IV3 5NX

This advice is given without prejudice to the future consideration of and decision on any application received by The Highland Council

Thathar a' toirt seachad na comhairle seo gun chlaon-bhreith do bheachdachadh air agus codhùnadh a thaobh tagradh sam bith a tha Comhairle na Gàidhealtachd a' faighinn san àm ri teachd

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before submitting. Thank you for your co-operation.

Register at <u>consult.highland.gov.uk</u> to be kept updated on Development Plan documents in Highland.

From:

Sent: 30 September 2025 09:49

To:

Subject: RE: Achany Extension Wind Farm Scoping Response Further Clarifications

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Hi

Has your colleague in traffic & transport been able to look at our response below, and the Transport Scotland email confirming they're happy? We're hoping to submit to ECU at the end of this week or start of next.

Kind regards,

Consents Strategy Advisor

SSE Renewables

T:

sserenewables.com

Sent: 17 September 2025 16:16

Subject: [EXTERNAL] RE: Achany Extension Wind Farm Scoping Response Further Clarifications

Hi

Hope you're well and thanks for your emails – apologies for the slow reply to respond to your queries.

<u>LVIA</u>: 45km would be the standard study area. If it can be demonstrated in the EIA that there will be no significant landscape and visual effects including cumulative effects and during the hours of darkness (incl. cumulative effects), then a 40km study area may be sufficient. However, this would be at the applicant's risk and the Council retains the position to ask for additional environmental information if the Council deems it necessary.

<u>Traffic and Transport:</u> apologies, my colleague who has been dealing with this case is

on leave currently, returning next week, so feedback on this issue will have to wait until then.

<u>Socio-economic, Tourism and Recreation</u>: This is acceptable, the Council would also request a statement that responds to the Council's social value charter and CWB strategy

<u>Forestry:</u> It is standard wording, however if there is any felling required for HGV and/or AIL movements, this should also be included in the submission and details of appropriate compensatory planting proposals.

I trust that clarifies your queries, do let me know if you need anything else

Kind regards,



Infrastructure, Environment and Economy

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The Highland Council
Glenurquhart Road
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IV3 5NX

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Register at <u>consult.highland.gov.uk</u> to be kept updated on Development Plan documents in Highland.

From:
Sent: 04 September 2025 10:02
To:
Cc:
Farm Scoping Response Further Clarifications
CAUTION: This email was sent from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.
Hope you're well. I wanted to let you know that we've just received the attached
response from Transport Scotland, agreeing with our scoping out of Traffic and
Transport. I'm sending this on just in case this helps with confirming THC's own view
on the topic.

Kind regards,
Consents Strategy Advisor
SSE Renewables
T:

sserenewables.com



Subject: Achany Extension Wind Farm Scoping Response Further Clarifications



Further to our previous emails about Ecology and Ornithology, I am writing with queries about a few other sections of the THC Scoping Response:

LVIA

Paragraph 3.24 states a study area of 45km. Following careful consideration and in consultation with our EIA team, we propose to retain the previously agreed 40km study area used for the Consented Development. The Zone of Theoretical Visibility (ZTV) modelling for the Proposed Varied Development indicates that the majority of potential significant effects are contained within the 40km radius and, while the turbines are taller, the incremental increase in visibility beyond 40km is limited and

unlikely to result in materially different or significant effects.

Maintaining a consistent study area with the Consented Development allows for a robust and meaningful comparative assessment. This consistency will enable clarity and transparency in the LVIA and EIA reporting. We remain committed to undertaking a comprehensive and proportionate assessment within the 40km study area and will ensure that all relevant viewpoints and receptors are appropriately considered and are as agreed through consultation with NatureScot.

We would ask if you are content with this reasoning?

Traffic & Transport

Paragraph 3.84 notes that the 'Roads Authority believes it is acceptable to scope out Transportation & Traffic when reviewing this application as road mitigation measures are already in place to manage the road network within the consented application.' After this judgement, from para 3.85 onward, the scoping response goes into detail on 'required' assessment. We would like to confirm that THC is in agreement that the chapter can indeed be scoped out?

Socio-Economic, Tourism & Recreation

Paragraph 3.90 confirmed that 'Socio-Economic, Tourism and Recreational impacts should be considered even if this is separate to the EIAR to ensure that these matters are appropriately addressed.' In pursuit of this, we confirm we will be including a 'Socio-Economic Report' in line with the reporting framework recently published by Scottish Renewables. The reporting framework was developed in collaboration with practitioners and legal experts as part of the Scottish Government Onshore Wind Sector Deal commitment. The report will evidence how the Proposed Development aligns with policy 11 of NPF4.

Forestry

Paragraph 3.99 confirms that 'The Council's Forestry Officer was consulted, and noted the proposed development does not appear to involve any significant adverse impact on existing trees or woodland. Therefore, no further comments have been made.' However, paragraph 3.100 then continues to require a Forestry chapter, citing that the 'layout of the access road, turbines or associated infrastructure will impact on Forestry.' We assume the latter reference is an extract from standard consultation response text, as in this case we can confirm that there is no forestry or proposed woodland felling as part of the Proposed Varied Development and therefore no assessment or chapter relating to forestry impacts will be provided. We trust that THC agree with this approach for this particular application?

I would like to thank you again for your quick and detailed response to our previous Ecology and Ornithology queries. Hopefully the above are equally straightforward to assess.



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Pell Frischmann

93 George Street - EDINBURGH EH2 3ES

Telephone: +44(0)131 240 1270 Email: pfedinburgh@pellfrischmann.com www.pellfrischmann.com

Our ref:

Transport Scotland 5th Floor, 177 Bothwell Street Glasgow G2 7ER

For the attention of

25 August 2025

Dear

ECU0006178 ACHANY EXTENSION WIND FARM: RESPONSE TO REQUEST FOR SCOPING

Pell Frischmann has been instructed by SSE Renewables (the Applicant) to review scoping responses for the proposed Achany Wind Farm Extension S36C. We have reviewed your scoping reply dated 19th July 2025 (ref GB01T19K05).

Project History

The original Achany Extension Wind Farm application was submitted for 20 turbines at a tip height of 149.9m. The transport and access elements of this proposal were assessed by Tetra Tech in 2021, with an EIA Transport Chapter¹ and Transport Assessment² undertaken in support of the application.

In 2022, The Highland Council proposed "no objection" to the scheme on condition that two turbines were removed. A subsequent Additional Information EIA submission³ was made. This proposed the removal of two turbines (and deletion of associated access tracks), with no other changes.

As part of the 2022 Additional Information application, no changes to the transport assessments were undertaken, and all traffic figures were based upon the 20 turbine scheme. Neither Transport Scotland nor The Highland Council objected to the revised scheme and the application was consented.

New Application

In 2025, SSE Renewables decided to alter the scheme to ensure that the project was more commercially viable. This resulted in a decision to increase the tip heights of the turbines and undertake minor alterations to the access track network.

The introduction of higher tip height turbines will result in the following changes:

Marginally larger foundations, requiring more concrete and steel reinforcement;

https://www.sserenewables.com/onshore-wind/in-development/achany-extension/ Pell Frischmann is the trading name of PF Consulting Group Ltd, Pell Frischmann Consultants Ltd, Pell Frischmann Consulting Engineers Ltd and Pell Frischmann Ltd. We value your data, please see our Privacy Notice on www.pellfrischmann.com which details how we handle your data in compliance with GDPR.





¹ https://www.sserenewables.com/media/0j3dtedk/volume-2-chapter-13-traffic-and-transport.pdf

² https://www.sserenewables.com/media/mshgvmcx/volume-4-technical-appendix-13-1-transport-assessment.pdf

- Marginally larger crane pads requiring further stone for their construction;
- A change in tower sections (the rotor diameter is unchanged); and
- A change in the numbers of escort vehicles for the change in tower section deliveries.

In addition, the changes to the access track network and other alterations proposed by the Applicant are proposed, namely:

- A minor decrease in access track length when compared to the Additional Information proposals;
- The provision of eight new turning heads; and
- An alteration in the length of internal cabling, primarily affecting the requirement for cabling sand on site.

Revised Traffic Generation

The original application was based upon the following estimates:

- 80% of material required to construct the application would be sourced from borrowpits located within the site. This is a safe assumption, given that the Applicant has already constructed a previous wind farm on the site. The import of stone relates to the capping surface of the track network;
- For the purposes of the assessment, it is assumed that the capping layer is 0.2m thick;
- The original application over assumed the number of tower sections required at four sections. The Applicant has advised that the higher tip height required for the new application will require up to five tower sections; and
- The Abnormal Indivisible Load (AIL) escort vehicles will remain unchanged.

Imported Stone

The original 20 turbine application assumed an import of 50,000m³. The revised application track lengths are shorter than the overall lengths, however, now include eight new turning heads. The revised estimate for imported stone material is now 49,485m³.

Given that this revised figure is very similar to the original application figure, it is assumed for robustness, that no further import is required to be assessed, when compared to the original application.

Other Materials

Using the details provided in the Tetra Tech assessments, it is possible to estimate the differences between the original assessment and the new application proposals. Using the same assessment approach and construction programme, the adjusted material volumes between the 20 turbine and new 18 turbine applications have been estimated. Resulting in the summary table provided below.

Table 1: Traffic Generation Estimate Summary

Element	Difference Between Original and New Applications	No of HGV	No of Movements	No of Months for Activity	Vehicles per Month
Concrete	610.56 m ³	49	98	5	20
Aggregate					
Concrete Sand	381.6 m ³	31	61	5	12
Reinforcement	177.3 m ³	6	12	5	2
Cabling Sand	-381.6 m ³	-23	-46	6	-8
AIL Loads	-2 loads	-2	-4	6	-1

The resulting traffic generation has been included to the peak month of traffic generation (Month 7), taken from the Tetra Tech Transport Assessment. This is summarised in Table 2.

Table 2: Traffic Peak Review (Month 7)

Table 2. Traffic Feak Neview (World 7)							
Activity	Original 20 Turbine Application (Month 7 Monthly Flows)	Additional traffic associated with the new Application (in Month 7)	Combined traffic generation for Month 7				
Site mobilisation /	0	0	0				
demobilisation							
General site delivery vehicles	40	0	40				
Earth moving plant	0	0	0				
Imported stone	1,250	0	1,250				
Reinforcement	28	2	30				
Concrete	375	32	407				
Cable Deliveries	2	0	2				
Cabling Sand	188	-8	180				
Geotextile separators	4	0	4				
Delivery of HV electrical items	11	0	11				
Cranage and related vehicles	12	0	12				
AIL Escorts	97	-1	96				
Turbine transporters	88	-1	87				
Staff	1,056	0	1,056				
Service (food/water etc.)	40	0	40				
Total estimated movements	3,191	25	3,216				
Working Days	22		22				
Daily Average	145		146				
LGV	52		52				
HGV	93		94				

The assessment indicates that changes in traffic flows arising between the original Transport Assessment and the revised 18 turbine layout are negligible. As such, the IEMA assessment and associated mitigation measures already accepted as part of the original application are still valid and no further assessment is considered necessary.

AIL Deliveries

The AIL assessment accepted under the 20 turbine Application assumed a maximum tower dimension of 29.960m in length and a maximum width of 4.300m.

At this stage, it is not possible to confirm the exact tower dimensions that would be used on the site, should the application be consented. The Additional tower section dimensions are however unlikely to deviate significantly from that assumed previously.

Given the Scottish Government's Energy Consents Unit (ECU) has approved model conditions for new wind farm applications, it is considered that Condition 24 would be an appropriate mechanism to review any changes in tower sections that may occur. The wording for the model condition is as follows:

Pell Frischmann

Cont'd./... 4

Abnormal Loads

- (1) There shall be no abnormal load deliveries to the site until an Abnormal Load Route Assessment Report, [including proposed trial runs], has been submitted to and approved in writing by the Planning Authority in consultation with Transport Scotland. The Abnormal Load Route Assessment Report shall provide:
- (a) Details of a communications strategy to inform the relevant communities of the programme of abnormal load deliveries:
- (b) Details of any accommodation measures required for the local road network including the removal of street furniture, junction widening and traffic management;
- (c) Any additional signing or temporary traffic control measures deemed necessary on the trunk road network due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland.
- (d) Details of the route for abnormal loads on the local and trunk road networks and any recommendations for delivery of abnormal loads;
- (e) An assessment of the capacity of any bridge crossings on the route to cater for abnormal loads, and details of proposed upgrades and mitigation measures required for any bridge crossings; and
- (f) A plan for access by vehicles carrying abnormal loads, including but not limited to the number and timing of deliveries and the length, width and axle configuration of all such traffic associated with the Development.
- (2) Prior to the first delivery of an abnormal load, a programme for abnormal load deliveries shall be submitted to, and be approved in writing by the Planning Authority in consultation with Transport Scotland.
- (3) Prior to any movement of abnormal loads (including trial runs) the Company must complete any mitigation works set out in in the scheme approved under part (1) of this condition, and maintain such measures during the period of abnormal load deliveries.
- (4) The trial-run shall be undertaken in accordance with the details approved under part (1) prior to the movement of any abnormal loads.
- (5) The details in the approved report shall thereafter be implemented in full prior the first delivery of an abnormal load.

Reason: In the interest of road safety and to ensure that abnormal loads access the site in a safe manner.

The Applicant is content to accept this condition, or a variant of it subject to agreement, to confirm all AIL details.

Pell Frischmann

Cont'd./... 5

Summary

The revised site layout that is proposed for the new Application will not result in any significant traffic generation and as such, the assessment conclusions from the 2021 Transport Assessment and EIA Transport Chapter are still considered valid.

The scoping response from The Highland Council notes that they consider that transport matters can be scoped out of any future application.

I would be very grateful if you could review the details provided in this letter and confirm that trunk road transport matters can now be scoped out of the future EIA for the project.

Should you wish to discuss any points in this letter, then please do not hesitate to contact me.

Yours sincerely
On behalf of **Pell Frischmann**

Redacted Signature

Sector Director - Energy

cc. The Highland Council

Development Management and Strategic Road Safety **Roads Directorate**

5th Floor, 177 Bothwell Street, Glasgow, G2 7ER george.smith@transport.gov.scot



Energy Consents Unit The Scottish Government 5 Atlantic Quay 150 Broomielaw Glasgow G2 8LU Your ref: EC00006178

Our ref: GB01T19K05

Date: 03/09/2025

Econsents Admin@gov.scot

Dear Sirs.

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 36C APPLICATION FOR ACHANY EXTENSION WIND FARM

Further to our letter in response to the Scoping Consultation dated 19th June 2025, Transport Scotland has received Further Information (FI) from the Applicant's Consultant, Pell Frischmann which has resulted in an update to our previous response, as follows.

Assessment of Environmental Impacts

In our original response of 19th June 2025, we noted that the Applicant is seeking to vary an existing consent for Achany Extension Wind Farm which comprises the construction and operation of 18 turbines with a tip height of up to 149.9m. The revised proposal comprises 18 turbines with a blade to tip height of up to 200m, an increase of 50m in height. Given this increase in height and associated hardstandings, we sought a screening assessment be provided, as well as a full Abnormal Loads Assessment which takes account of the increase in turbine height.

The FI provided by Pell Frischmann includes a comparison of the revised Traffic Generation associated with the changes in content, as well as a Traffic Generation Estimate Summary. This information provides confirmation that the changes in traffic flows arising between the original Transport Assessment and the revised 18 turbine layout are negligible. As such, we can confirm that Transport Scotland is satisfied that no further detailed assessment is necessary and the findings of the original assessment can be relied upon.

Abnormal Load Assessment

Pell Frischmann has confirmed that the tower section dimensions are unlikely to deviate significantly from that assumed previously, and that the movement of Abnormal Loads can be dealt with through the application of the standard Abnormal Loads Condition.

We can confirm that Transport Scotland is satisfied with this approach.

Conclusions

Having reviewed the FI, we can confirm that Transport Scotland is satisfied that no further assessment of potential environmental effects associated with increased traffic is necessary, however, we would request that the following Conditions be applied to any consent granted:

- (1) There shall be no abnormal load deliveries to the site until an Abnormal Load Route Assessment Report, [including proposed trial runs], has been submitted to and approved in writing by the Planning Authority in consultation with Transport Scotland. The Abnormal Load Route Assessment Report shall provide:
 - (a) Details of a communications strategy to inform the relevant communities of the programme of abnormal load deliveries;
 - (b) Details of any accommodation measures required for the local road network including the removal of street furniture, junction widening and traffic management;
 - (c) Any additional signing or temporary traffic control measures deemed necessary on the trunk road network due to the size or length of any loads being transported must be undertaken by a recognised QA traffic management consultant, to be approved by Transport Scotland.
 - (d) Details of the route for abnormal loads on the local and trunk road networks and any recommendations for delivery of abnormal loads;
 - (e) An assessment of the capacity of any bridge crossings on the route to cater for abnormal loads, and details of proposed upgrades and mitigation measures required for any bridge crossings; and
 - (f) A plan for access by vehicles carrying abnormal loads, including but not limited to the number and timing of deliveries and the length, width and axle configuration of all such traffic associated with the Development.
- (2) Prior to the first delivery of an abnormal load, a programme for abnormal load deliveries shall be submitted to and be approved in writing by the Planning Authority in consultation with Transport Scotland.
- (3) Prior to any movement of abnormal loads (including trial runs) the Company must complete any mitigation works set out in in the scheme approved under part (1) of this condition and maintain such measures during the period of abnormal load deliveries.
- (4) The trial-run shall be undertaken in accordance with the details approved under part (1) prior to the movement of any abnormal loads.
- (5) The details in the approved report shall thereafter be implemented in full prior the first delivery of an abnormal load.

Reason: In the interest of road safety and to ensure that abnormal loads access the site in a safe manner.

I trust that the above is satisfactory but should but wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office can assist on 0141 343 9636.

Yours faithfully



Transport Scotland Roads Directorate

cc – SYSTRA Ltd.