

## McCormack J (Josh)

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**From:** debra.baldwin@bt.com on behalf of radionetworkprotection@bt.com  
**Sent:** 19 January 2021 12:09  
**To:** McCormack J (Josh)  
**Cc:** radionetworkprotection@bt.com  
**Subject:** Achany Extension Wind Farm (Previously Glencassley Wind Farm) - Updates to Scoping - WID11405

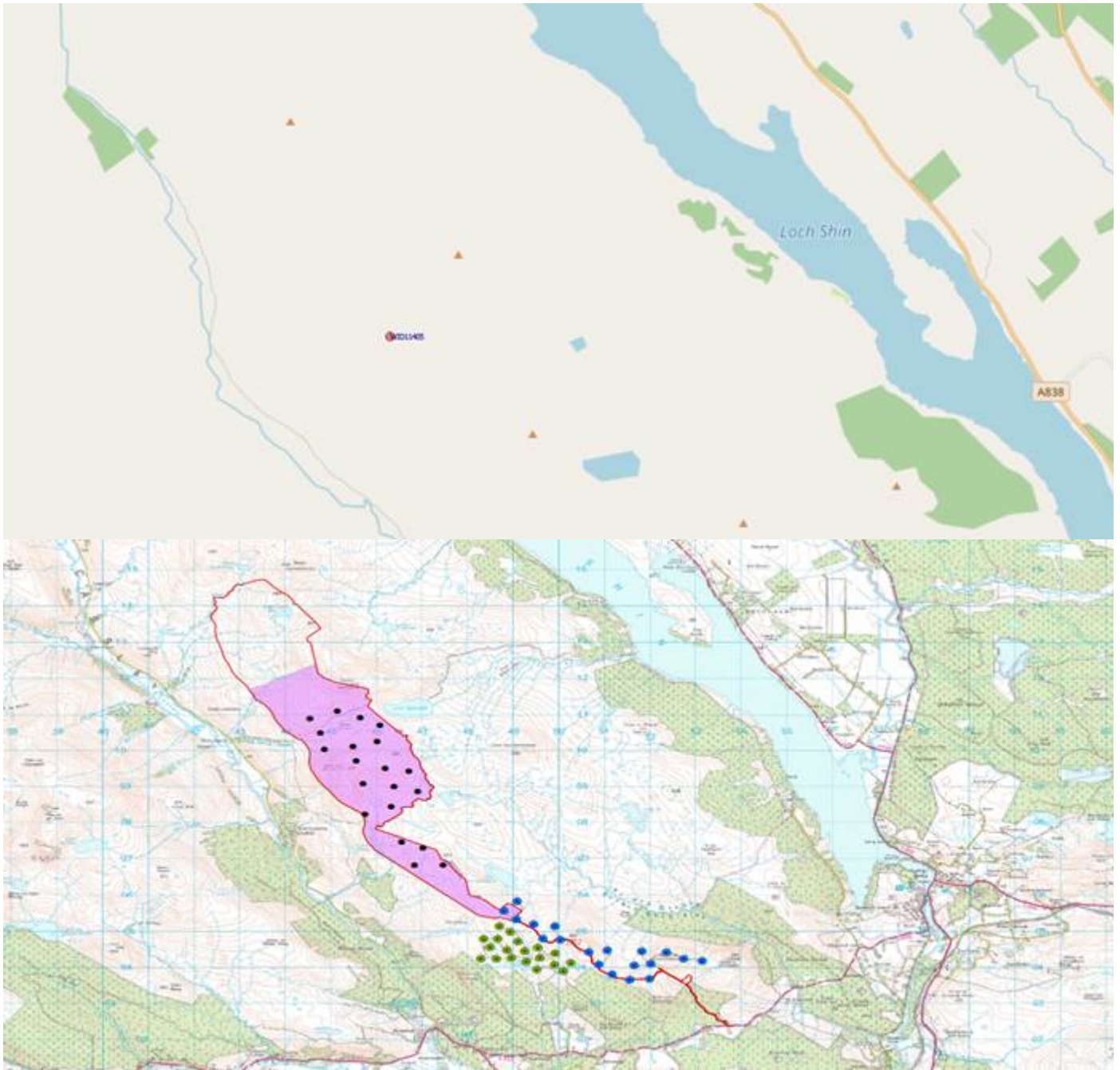


### **OUR REF: WID11405**

We have studied this Wind turbine proposal with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that, the Project indicated should not cause interference to BT's current and presently planned radio network.

See below map which shows there are no links within 500 metres of the proposed locations.



Please direct all queries to [radionetworkprotection@bt.com](mailto:radionetworkprotection@bt.com)

**Debra Baldwin**  
Engineering Services Radio Planning

T: 0331 6241096  
M: 07483 912588



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**From:** Josh.McCormack@gov.scot

**Sent:** 24 November 2020 14:38

**Subject:** Achany Extension Wind Farm (Previously Glencassley Wind Farm) - Updates to Scoping - WID11405

Good afternoon,

### **Achany Extension Wind Farm (Previously Glencassley Wind Farm) - Updates to Previous Scoping**

In October 2019 the ECU issued a Scoping Opinion on behalf of Scottish Ministers in relation to a request for a scoping opinion made by Ash Design & Assessment Ltd on behalf of SSE Renewables Development for the proposed section 36 application for Glencassley Wind Farm. The proposed development was for 26 wind turbines, turbine tip height would be greater than 150m, located in the planning authority area of The Highland Council.

The Scottish Ministers undertook a consultation on the scoping report and this commenced on 21 August 2019 and closed on 07 October 2019. Your organisation was included in this consultation.

On 20 November 2020 the Applicant submitted updated documents which provide further detail/changes to the proposed development detailed in the initial Scoping Report submitted in 2019. They also give notice of the project name change to Achany Extension Wind Farm.

The updates to the scoping can be viewed at the Scottish Government's Energy Consents Unit website [www.energyconsents.scot](http://www.energyconsents.scot) by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing Achany Wind Farm Extension into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00001930** and then click on **Documents** tab.

I would be grateful for you could consider the updated information and provide any further comments your organisation may have in addition to any previous response submitted. I would be grateful if you could provide comments by close **16 December 2020**. If you have already submitted a response in relation to the previous consultation and do not provide any additional response in light of the updates we will assume you have no further comments to make and the initial response still remains valid.

Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

If you have any queries regarding the above email then please do not hesitate to contact me directly.

Many thanks

Josh

**Josh McCormack | Senior Case Officer | Energy Consents Unit**

Scottish Government | ' : 0131 244 1177 | Mobile: 07392 285321 | ✉: [josh.mccormack@gov.scot](mailto:josh.mccormack@gov.scot)

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## McCormack J (Josh)

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**From:** McGrogan, Joan <joan.mcrogan@crownestatescotland.com>  
**Sent:** 07 December 2020 15:53  
**To:** McCormack J (Josh)  
**Cc:** Econsents Admin  
**Subject:** 20201207 - SSE Renewables Development Achany Extension Wind Farm  
(Previously Glencassly Wind Farm) - CES interests not affected

Dear Josh

Thank you for your email

I write to confirm that the assets of Crown Estate Scotland are not affected by this proposal. We therefore have no comments to make.

Kind regards

Joan.

**Joan McGrogan**  
**Portfolio Co-ordinator**  
**Crown Estate Scotland**

t: 0131 376 1569 / 07391 407753

Our team are currently working from home. Mail is occasionally being collected from our offices (addresses are at [www.crownestatescotland.com/contact-us](http://www.crownestatescotland.com/contact-us)). Where possible, please email or call us rather than post mail.

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# Defence Infrastructure Organisation

Teena Oulaghan  
Safeguarding Manager  
Ministry of Defence  
Safeguarding Department  
Kingston Road  
Sutton Coldfield  
West Midlands  
B75 7RL

Josh McCormack  
Energy Consents Unit,  
Scottish Government,  
4th Floor,  
5 Atlantic Quay,  
150 Broomielaw,  
Glasgow,  
G2 8LU.

MOD Telephone: 07970170934  
E-mail: teena.oulaghan100@mod.gov.uk

Application Ref: ECU00001930  
Our Reference: DIO13289

2 December 2020

Dear Josh,

**Site Name** Achany Extension Wind Farm (Previously Glencassly Wind Farm).  
**Site Address** Glencassley Estate, between River Cassley and Loch Shin  
**Proposal** Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Previous Scoping.

Thank you for consulting the Ministry of Defence (MOD) on the above request for a Scoping Opinion for the proposed construction and operation of a wind farm which was received by our office on 24th November 2020

I am writing to inform you that the MOD has concerns about this proposed development.

We have assessed this proposal on the basis that there will be 20 turbines at 149.90 metres in height from ground level to blade tip and located at the grid references detailed in the table below:

Turbine	Easting	Northing
1	245,148	911,075
2	244,543	910,876
3	245,656	910,892
4	246,087	910,689
5	244,780	910,490
6	246,023	910,241
7	245,495	910,095
8	244,872	910,018
9	245,566	909,700
10	246,198	909,516
11	246,722	909,421
12	246,915	908,856
13	246,390	909,004
14	245,719	909,079

15	246,334	908,448
16	245,756	908,237
17	246,564	907,472
18	247,025	907,297
19	246,838	906,821
20	247,467	906,836

It has been identified that this development will have the following impacts upon defence operations:

### **Military Low Flying Training**

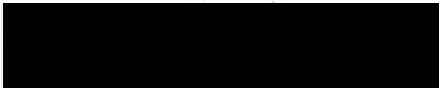
The proposed will occupy Tactical Training Area 14T (TTA 14T) in which military fixed wing aircraft can engage in operational low flying training down to 45.7m above terrain features. The development proposed will cause a potential obstruction hazard to these military low flying training activities. To address this impact, it would be necessary for the development to be fitted with aviation safety lighting. Therefore, the MOD will request that the perimeter turbines be fitted 25 candela omni-directional red lighting or Infrared COMBI lighting with an optimised flash pattern of 60 flashes per minute of 200ms to 500ms duration at the highest practicable point.

MOD Safeguarding wishes to be consulted and notified about the progression of this proposal and any subsequent application(s) that may be submitted relating to it to verify that it will not adversely affect defence interests.

I trust this adequately explains our position on this matter. Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

<https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours sincerely



Teena Oulaghan  
Safeguarding Manager



HISTORIC  
ENVIRONMENT  
SCOTLAND

ÀRAINNEACHD  
EACHDRAIDHEIL  
ALBA

By email to: [econsents\\_admin@gov.scot](mailto:econsents_admin@gov.scot)

Energy Consents Unit  
4th Floor, 5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

Longmore House  
Salisbury Place  
Edinburgh  
EH9 1SH

Enquiry Line: 0131-668-8716  
[HMConsultations@hes.scot](mailto:HMConsultations@hes.scot)

Our case ID: 300039922  
Your ref: ECU00001930  
07 December 2020

Dear Energy Consents Unit

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017  
Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping  
Scoping Report**

Thank you for your consultation which we received on 24 November 2020 about the above scoping report. We have reviewed the details in terms of our historic environment interests. This covers world heritage sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and historic marine protected areas (HMPAs).

The relevant local authority archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include heritage assets not covered by our interests, such as unscheduled archaeology, and category B- and C-listed buildings.

**Proposed Development**

We understand that the proposed development comprises a windfarm of up to 20 turbines of up to 149.9m. The proposed development is located within the Glencassley and Glenrossal Estates, situated between the River Cassley and Loch Shin near Lairg, Sutherland, in the Highlands.

**Scope of assessment**

We have provided a scoping opinion in September 2019 about a similar proposal under a different name of windfarm (Glencassly Wind Farm). The Table 1 of the Scoping Refresh document identifies that there is no anticipated changes in scope for the cultural heritage chapter from the scoping opinion where we had given advice back in September 2019. Our advice therefore still stands.

We have reviewed the submitted Scoping Report in terms of our historic environment interests and note that very little information has been provided in the Report on the scope and methodology that is to be employed for the assessment of impacts on cultural





heritage. However, we understand that an evaluation of the potential setting impacts on scheduled monuments and listed buildings is to be carried out. In the absence of more specific details regarding the size and location of the proposed turbines and a ZTV with historic assets annotated on it, it is not possible to provide detailed advice on the likely impact of the scheme on the setting of historic assets within our remit.

We can confirm that there are no scheduled monuments, category A-listed buildings, inventory gardens and designed landscapes, or inventory battlefields within the development site. However, there are some heritage assets within the surrounding area.

In particular, we note that there is one scheduled monument: [Dail Langwell, broch 1675m NW of Croich](#) (SM1852) located approximately 2km south-west of the site boundary.

The setting of Dail Langwell, broch can be characterised by the floor and slopes of the river valley in which it sits. It was deliberately sited in such a position to be visibly prominent throughout and have wide views out over the surrounding valley and route ways through it.

It is possible that the proposed development would be visible from the broch, or important views towards it, and have an impact on its setting. We would therefore recommend that further consideration is given to assessing any impacts thoroughly within the EIA process. As part of this process, we would expect to see visualisations that assess the impact of the turbines on the setting of the broch. Any other heritage assets that might be impacted by the proposal should also be assessed.

Where significant adverse impacts are identified they should be reduced or avoided by amendments to the design.

### **Further information**

Guidance about national policy can be found in our 'Managing Change in the Historic Environment' series available online at [www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes](http://www.historicenvironment.scot/advice-and-support/planning-and-guidance/legislation-and-guidance/managing-change-in-the-historic-environment-guidance-notes). Technical advice is available on our Technical Conservation website at <http://conservation.historic-scotland.gov.uk/>.

We hope this is helpful. Please contact us if you have any questions about this response. The officer managing this case is Chloe Porter and they can be contacted by phone on 0131 668 8653 or by email on [chloe.porter@hes.scot](mailto:chloe.porter@hes.scot).

Yours faithfully

**Historic Environment Scotland**

## McCormack J (Josh)

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**From:** Safeguarding <Safeguarding@hial.co.uk>  
**Sent:** 11 December 2020 12:01  
**To:** McCormack J (Josh); Econsents Admin  
**Subject:** RE: Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping

**Your Ref:** ECU00001930  
**HIAL Ref:** 2020/0215/INV

Dear Sir/Madam,

**PROPOSAL:** Achany Extension Wind Farm (Previously Glencassley Wind Farm)

**LOCATION:** Glencassley and Glenrossal Estates, situated between the River Cassley and Loch Shin near Lairg

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With reference to the above proposed development, it is noted that the layout is not fixed and further refinements and amendments may result. It is considered that the proposed development could accommodate 20 turbines with a tip height of approximately 149.9m. Our calculations show that this development would be unlikely to impact the safeguarding criteria for Inverness Airport.

HIAL would require exact turbine heights and locations to provide further comment.

Regards,

**Safeguarding Team**

**Highlands and Islands Airports Limited**

Head Office, Inverness Airport, Inverness IV2 7JB

✉ [safeguarding@hial.co.uk](mailto:safeguarding@hial.co.uk) 🌐 [www.hial.co.uk](http://www.hial.co.uk)

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20210422 11:00  
**Ticket #WF470209**

**Status** WF\_Cleared  
**Priority** Normal  
**Department** Windfarms  
**Create Date** 20/04/2021 20:01

**Name** Aimi Munro  
**Email** aimi.munro@sse.com  
**Phone** 07553647621  
**Source** Web

## Follow up on scoping consultation

20/04/2021 20:01

Aimi Munro

Hello. SSE Renewables carried out scoping refresh in November 2020 for a proposed wind farm development named Achany Extension Wind Farm. We didn't receive a response from JRC at the time, but I would like to follow up with you to confirm the proposed development does not pose any issues to JRC or any equipment. If required the scoping documentation is on the Energy Consents Unit website - <https://www.energyconsents.scot/ApplicationDetails.aspx?cr=ECU00001930>

Many thanks, Aimi Munro.

21/04/2021 09:21

Lindsay Kiley

Good morning Aimi,

RE: Achany Windfarm Extension

Sorry you didn't receive a reply to your previous application. I had a look and I couldn't see the details from the previous application.

Can you send across the wind turbine grid references, hub height and blade radius please? We will then do our analysis.

Kind regards,  
Lindsay Kiley  
Technical Assistant

21/04/2021 17:03

Aimi Munro

Hi Lindsay,

Thank you for getting back to me. In relation to the Achany Extension Wind Farm, I can provide you with some parameters under consideration at present which may assist in carrying out your analysis.

• **Indicative Turbine Grid references:**

**Turbine Number Grid Reference**

<b>1</b>	245164911083
<b>2</b>	244595910950
<b>3</b>	245618910922
<b>4</b>	245980910740
<b>5</b>	244768910506
<b>6</b>	246023910241
<b>7</b>	245495910095
<b>8</b>	244872910018
<b>9</b>	245597909695
<b>10</b>	246198909516
<b>11</b>	246722909421
<b>12</b>	246915908855
<b>13</b>	246390909004
<b>14</b>	245810909163
<b>15</b>	246334908448
<b>16</b>	245756908237
<b>17</b>	246564907472
<b>18</b>	247025907297
<b>19</b>	246838906821
<b>20</b>	247468906810

**Indicative Rotor Diameter Option:** the option under consideration at present is 136m.

- **Indicative Hub Height Option:** the option under consideration at present is 81.9m

I hope this information is sufficient for your analysis, please do let me know if you require any further information.

Thanks

Aimi

**Aimi Munro** || Consents Advisor

**SSE Renewables**

Inveralmond House,

200 Dunkeld Road, Perth, PH1 3AQ

**M:** 07553 647621

**sserenewables.com**

22/04/2021 11:41

Lindsay Kiley

Dear Aimi,

**Name/Location:** Achany Extension Wind Farm

**Site Centre/Turbine at NGR/IGR:**

**Turbine Number Grid Reference**

<b>1</b>	245164911083
<b>2</b>	244595910950
<b>3</b>	245618910922
<b>4</b>	245980910740
<b>5</b>	244768910506
<b>6</b>	246023910241
<b>7</b>	245495910095
<b>8</b>	244872910018
<b>9</b>	245597909695
<b>10</b>	246198909516
<b>11</b>	246722909421
<b>12</b>	246915908855
<b>13</b>	246390909004
<b>14</b>	245810909163
<b>15</b>	246334908448
<b>16</b>	245756908237
<b>17</b>	246564907472
<b>18</b>	247025907297
<b>19</b>	246838906821
<b>20</b>	247468906810

**Development Radius:** 0.1KM

**Hub Height:** 81.9m **Rotor Radius:** 68m

This proposal **cleared** with respect to radio link infrastructure operated by:

20210422 11:00  
20210422 11:00  
proposals for wind farms on behalf of the UK Fuel & Power Industry. This is to assess their potential to interfere with radio systems operated by utility companies in support of their regulatory operational requirements.

In the case of this proposed wind energy development, JRC does not foresee any potential problems based on known interference scenarios and the data you have provided. However, if any details of the wind farm change, particularly the disposition or scale of any turbine(s), it will be necessary to re-evaluate the proposal.

In making this judgement, JRC has used its best endeavours with the available data, although we recognise that there may be effects which are as yet unknown or inadequately predicted. JRC cannot therefore be held liable if subsequently problems arise that we have not predicted.

It should be noted that this clearance pertains only to the date of its issue. As the use of the spectrum is dynamic, the use of the band is changing on an ongoing basis and consequently, developers are advised to seek re-coordination prior to considering any design changes.

Regards

Wind Farm Team

Friars House  
Manor House Drive  
Coventry CV1 2TE  
United Kingdom

Office: 02476 932 185

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<http://www.jrc.co.uk/about-us>

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## McCormack J (Josh)

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**From:** Dalglish K (Kieran)  
**Sent:** 18 December 2020 14:09  
**To:** McCormack J (Josh)  
**Subject:** FW: Achany extension windfarm ECU00001930

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**From:** Davie Black  
**Sent:** 18 December 2020 13:32  
**To:** Econsents Admin  
**Subject:** Achany extension windfarm ECU00001930

Dear Sir/Madam,  
Thank you for the opportunity to comment on the updated Scoping Report for the Achany Extension (formerly Glencassley) Wind Farm. ECU00001930

We note the improved clarity on the proposed development and welcome the reinstatement of Carn Chuinneag as a viewpoint.

With kind regards

Davie Black  
**Access & Conservation Officer**

T: 07555 769325

Mountaineering Scotland  
The Granary, West Mill Street  
Perth, PH1 5QP



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## McCormack J (Josh)

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**From:** NATS Safeguarding <NATSSafeguarding@nats.co.uk>  
**Sent:** 09 December 2020 16:23  
**To:** McCormack J (Josh)  
**Cc:** Econsents Admin  
**Subject:** RE: Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping [SG15221]

Our Ref: SG15221

Dear Josh

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully



**NATS Safeguarding**

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



Mr Josh McCormack  
Energy Consents Unit  
The Scottish Government

**By Email:** [Econsents.Admin@gov.scot](mailto:Econsents.Admin@gov.scot) & [Josh.mccormack@gov.scot](mailto:Josh.mccormack@gov.scot)

8 December 2020  
Your ref: ECU 0000 1930  
Our Ref: CEA 161307

Dear Mr McCormack

**The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017  
Achany Wind Farm Extension (Previously Glencassley 2 Wind Farm), Lairg, Sutherland.  
Update on previous Scoping Advice**

Thank you for your email dated 24 November 2020, requesting our comments on a scoping refresh for this newly named development.

**1. Background**

The detailed comments we provided within our previous Scoping Response (dated 23 Sept 2019) are still valid (as attached). We provide additional comments and points of clarification since the number and dimensions of turbines have been revised (i.e. 20 turbines at 149m height). This is the first time we have seen a turbine layout for this particular development.

**2. Our revised comments on Scoping**

*2.1 Wind Land Areas*

**As this proposal is fully located within the Reay-Cassley WLA, it is highly likely to result in significant adverse effects on the qualities of this WLA and therefore we may object.** Due to the location, form and size, we expect it to be very difficult to accommodate a wind farm on this site. Even a small number of commercial turbines in this location would be likely to result in significant effects on wild land qualities.

We recommend that the applicant undertake an assessment of effects on wild land using the new Wild Land Technical Guidance (Sept 2020) found on our website, see: <https://www.nature.scot/assessing-impacts-wild-land-areas-technical-guidance>. As there are likely to be significant effects from this development, we agree that the Wild Land Assessment should include both Wild Land Areas: Reay – Cassley WLA and Foinaven – Ben Hee WLA.

The viewpoints that have been selected within the Reay-Cassley WLA include, viewpoint 23 (Meall an Aonaich) and viewpoint 10 (Ben More Assynt), are both elevated locations. Whilst these often form the best locations from which to assess visual effects, this is not necessarily the case when considering effects on WLA qualities. Therefore, we suggest that the developer identifies additional assessment locations where the wild land qualities are well expressed and the influence

of other development, such as wind farms, in the baseline is not so apparent. These do not need to be landscape and visual viewpoints, as they primarily will inform the wild land assessment. We would be eager to advise further on these locations if provided with wirelines and a more detailed ZTV.

Not all the wild land qualities for the Reay-Cassley WLA may be required for detailed assessment due to their individual susceptibility to the proposal. We are happy to comment on a draft list of qualities that will require a detailed assessment. We are particularly keen to see how the LVIA will inform modifications and refinements to the detailed design and identify any further appropriate mitigation measures to reduce potential effects.

We welcome the confirmation that aviation lighting will not be required due to the turbines being confirmed at <150m in height.

## 2.2 Protected Areas

This proposal abuts a component part of the Caithness & Sutherland Peatlands Special Protection Area (SPA), Ramsar Site and Special Area of Conservation (SAC) protected for its upland birds, peatland habitats and otter. In addition, this proposal is hydrologically connected to the River Oykel SAC protected for its Atlantic salmon and freshwater pearl mussel.

### *Caithness & Sutherland Peatlands SAC (Grudie Peatlands SSSI) River Oykel SAC*

The layout shows turbines in very close proximity to the Caithness & Sutherland Peatlands SAC (Grudie Peatlands SSSI) and close to watercourses which eventually flow into the River Oykel SAC. A Peat Slide Risk Assessment should be undertaken to inform the potential impacts upon all of these Protected Areas, and mitigation identified to reduce risk (e.g. turbine relocation or removal). Other assessments will also be required, as outlined in our previous scoping response.

## 3. Concluding comments

We have updated our helpful pre-application/scoping advice (Sept 2020) which can be found on our website, see: <https://www.nature.scot/general-pre-application-and-scoping-advice-onshore-wind-farms>.

Let me know if you need any further information from us on this proposal.

Yours sincerely

**David Patterson**

NatureScot<sup>1</sup> Area Officer - Northern Isles & North Highland

[David.patterson@nature.scot](mailto:David.patterson@nature.scot)

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<sup>1</sup> The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage.

## McCormack J (Josh)

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**From:** Bea Ayling <Bea.Ayling@rspb.org.uk>  
**Sent:** 02 December 2020 14:24  
**To:** McCormack J (Josh)  
**Cc:** Esme Clelland  
**Subject:** RE: Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping  
**Attachments:** Glencassley Wind Farm Scoping - RSPB response (2019).pdf

Dear Josh,

Thank you for consulting RSPB Scotland on these updates. Our previous scoping response dated 24<sup>th</sup> September 2019, attached, is still relevant with regards to the scoping for the revised scheme. However, we have the following additional comments to make:

- White-tailed eagle breeding data within 6km should be requested from HRSG.
- Figure 6 in the 2019 Scoping Report and new Figure 3 show that that vantage points 3, 5 and 7 do not cover the full 500m envelope around the proposed turbine locations, and they are within close proximity to some turbine locations – this will need to be justified in the EIA report.
- Due to the increasing number of wind developments in this area of the Highlands and adjacent to the Caithness and Sutherland Peatlands SPA, a robust cumulative assessment on the SPA and NHZ populations of impacted bird species should be undertaken with regards to collision risk, displacement and barrier effects. The assessment should include other proposed, consented and operational developments and the various grid connection projects associated with these wind developments.

Please don't hesitate to contact me if you have any questions.

Kind regards,

**Bea Ayling**

Conservation Officer – North Highland

**North Scotland Regional Office** Etive House, Beechwood Park, Inverness, IV2 3BW

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The Royal Society for the Protection of Birds (RSPB) is a registered charity: England and Wales no. 207076, Scotland no. SC037654

Our ref: PCS/173996  
Your ref: ECU00001930

SEPA email contact:  
Laura Wilson

16 December 2020

Josh McCormack  
Energy Consents Unit  
Scottish Government  
5 Atlantic Quay  
150 Broomielaw  
Glasgow  
G2 8LU

By email only to: [Econsents\\_Admin@gov.scot](mailto:Econsents_Admin@gov.scot)

Dear Mr McCormack

**The Electricity Act 1989  
The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations  
2017  
Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to  
Previous Scoping  
Between River Cassley and Loch Shin near Lairg, Sutherland**

Thank you for consulting SEPA on the scoping refresh for the above development proposal by your email received on 19 November 2020.

We welcome the opportunity to provide early advice on the proposed layout and as you know, we encourage developers to fully engage with us at the pre-application stage to try and ensure that our issues are taken on board early on in the process when they are easiest to address and to try, where possible, to avoid formal objections from us at a later stage.

Prior to the formal submission of the application we would therefore strongly encourage the developer to consult us further on the project with, as a minimum, the following three layout plans showing all permanent and temporary works (1) 50 m buffers to watercourses, (2) NVC survey results, and (3) all peat probing results (showing the location of individual peat probes, colour coded for depth). We would also be very happy to provide advice on any Groundwater Dependent Terrestrial Ecosystem assessment or other work on peat such as the Peat Management Plan if this would be helpful. We would also require the further information outlined in the attached appendix to be submitted in support of the application as it progresses.

## **1. Scoping refresh**

- 1.1 We have reviewed the letter from SSE dated 19 November 2020 (Reference: Glencassley Wind Farm (ECU00001930) – Request for refreshed Scoping Opinion and notice of project name change to Achany Extension Wind Farm ) and the Indicative Site Layout Plan (Figure 3). We note that alterations have been made since we previously provided comments (SEPA Reference: PCS/163732, September 2020) and we welcome that the overall area for development is now smaller and with only one access point.

- 1.2 We welcome that the proposed layout intends to make use of existing infrastructure associated with the Achany windfarm including tracks, borrow pit reuse and potential for use of operational buildings and storage areas. This approach will minimise impacts to undisturbed habitats. However, we consider that the two most northerly proposed borrow pits should be accessed via the proposed permanent track, rather than including new lengths of temporary track and the track loop further south should be removed from the design. The layout should be designed to minimise the extent of new works on previously undisturbed ground and our preference is for turbines, and the associated infrastructure, to be situated on the main track where feasible without the need for excessive additional loops and spurs.
- 1.3 We note that Phase 1 habitats and NVC surveys and Stage 1 peat probing have been undertaken and that Phase 2 peat probing is underway to refine the layout. It is stated that these will be submitted to SEPA during further pre-application discussions. We encourage these to be submitted as soon as possible to help inform the best environmental option for the site layout.

## **Regulatory advice for the applicant**

### **2. Regulatory requirements**

- 2.1 Details of regulatory requirements and good practice advice for the applicant can be found on the [Regulations section](#) of our website. See [The CAR Practical Guide](#) for advice on water environment regulatory issues. A Controlled Activities Regulations (CAR) construction site licence will be required for management of surface water run-off from the construction site. See SEPA's [Sector Specific Guidance: Construction Sites \(WAT-SG-75\)](#) for details. Site design may be affected by pollution prevention requirements and hence we strongly encourage the applicant to engage in pre-CAR application discussions with a member of the regulatory services team in your local SEPA office.
- 2.2 Management of surplus peat or soils may require an exemption under The Waste Management Licensing (Scotland) Regulations 2011. Proposed crushing or screening will require a permit under The Pollution Prevention and Control (Scotland) Regulations 2012. Consider if other environmental licences may be required for any installations or processes.
- 2.3 If you are unable to find the advice you need for a specific regulatory matter, please contact a member of the local compliance team (North Highland and Northern Isles) at: [NHNI@sepa.org.uk](mailto:NHNI@sepa.org.uk).

If you have any queries relating to this letter, please contact me by e-mail to [planning.north@sepa.org.uk](mailto:planning.north@sepa.org.uk).

Yours sincerely

Laura Wilson  
Senior Planning Officer  
Planning Service

Ecopy: Karen Anderson, Consent Manager, SSE [Karen.Anderson@sse.com](mailto:Karen.Anderson@sse.com) ; Scottish Government, [Josh.McCormack@gov.scot](mailto:Josh.McCormack@gov.scot)

*Disclaimer*

*This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found on our [website planning pages](#).*



## **Appendix 1: Detailed scoping requirements**

This appendix sets out our scoping information requirements. There may be opportunities to scope out some of the issues below depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site in order **to avoid delay and potential objection**.

If there is a delay between scoping and the submission of the application then please refer to our website for our latest information requirements as they are regularly updated; current best practice must be followed.

We would welcome the opportunity to comment on the draft submission. As we can process files of a maximum size of only 25MB the submission must be divided into appropriately named sections of less than 25MB each.

### **1. Site layout**

- 1.1 All maps must be based on an adequate scale with which to assess the information. This could range from OS 1: 10,000 to a more detailed scale in more sensitive locations. Each of the maps below must detail all proposed upgraded, temporary and permanent site infrastructure. This includes all tracks, excavations, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other built elements. Existing built infrastructure must be re-used or upgraded wherever possible. The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable. Cabling must be laid in ground already disturbed such as verges. A comparison of the environmental effects of alternative locations of infrastructure elements, such as tracks, may be required.

### **2. Engineering activities which may have adverse effects on the water environment**

- 2.1 The site layout must be designed to avoid impacts upon the water environment. Where activities such as watercourse crossings, watercourse diversions or other engineering activities in or impacting on the water environment cannot be avoided then the submission must include justification of this and a map showing:
  - a) All proposed temporary or permanent infrastructure overlain with all lochs and watercourses.
  - b) A minimum buffer of 50m around each loch or watercourse. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse and drawings of what is proposed in terms of engineering works.
  - c) Detailed layout of all proposed mitigation including all cut off drains, location, number and size of settlement ponds.
- 2.2 If water abstractions or dewatering are proposed, a table of volumes and timings of groundwater abstractions and related mitigation measures must be provided.
- 2.3 Further advice and our best practice guidance are available within the water [engineering](#)

section of our website. Guidance on the design of water crossings can be found in our [Construction of River Crossings Good Practice Guide](#).

- 2.4 Refer to Appendix 2 of our [Standing Advice](#) for advice on flood risk. Watercourse crossings must be designed to accommodate the 0.5% Annual Exceedance Probability (AEP) flows, or information provided to justify smaller structures. If it is thought that the development could result in an increased risk of flooding to a nearby receptor then a Flood Risk Assessment must be submitted in support of the planning application. Our [Technical flood risk guidance for stakeholders](#) outlines the information we require to be submitted as part of a Flood Risk Assessment. Please also refer to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).

### **3. Disturbance and re-use of excavated peat and other carbon rich soils**

- 3.1 Scottish Planning Policy states (Paragraph 205) that "Where peat and other carbon rich soils are present, applicants must assess the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO<sub>2</sub> to the atmosphere. Developments must aim to minimise this release."
- 3.2 The planning submission must a) demonstrate how the layout has been designed to minimise disturbance of peat and consequential release of CO<sub>2</sub> and b) outline the preventative/mitigation measures to avoid significant drying or oxidation of peat through, for example, the construction of access tracks, drainage channels, cable trenches, or the storage and re-use of excavated peat. There is often less environmental impact from localised temporary storage and reuse rather than movement to large central peat storage areas.
- 3.3 The submission must include:
- a) A detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements (including peat storage areas) overlain to demonstrate how the development avoids areas of deep peat and other sensitive receptors such as Groundwater Dependent Terrestrial Ecosystems.
  - b) A table which details the quantities of acrotelmic, catotelmic and amorphous peat which will be excavated for each element and where it will be re-used during reinstatement. Details of the proposed widths and depths of peat to be re-used and how it will be kept wet permanently must be included.
- 3.4 To avoid delay and potential objection proposals must be in accordance with [Guidance on the Assessment of Peat Volumes, Reuse of Excavated Peat and Minimisation of Waste](#) and our [Developments on Peat and Off-Site uses of Waste Peat](#).
- 3.5 Dependent upon the volumes of peat likely to be encountered and the scale of the development, applicants must consider whether a full Peat Management Plan (as detailed in the above guidance) is required or whether the above information would be best submitted as part of the schedule of mitigation.
- 3.6 Please note we do not validate carbon balance assessments except where requested to by Scottish Government in exceptional circumstances. Our advice on the minimisation of peat disturbance and peatland restoration may need to be taken into account when you consider such assessments.

#### **4. Disruption to Groundwater Dependent Terrestrial Ecosystems (GWDTE)**

- 4.1 GWDTE are protected under the Water Framework Directive and therefore the layout and design of the development must avoid impact on such areas. The following information must be included in the submission:
- a) A map demonstrating that all GWDTE are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
  - b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all GWDTE affected.
- 4.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice and the minimum information we require to be submitted.

#### **5. Existing groundwater abstractions**

- 5.1 Excavations and other construction works can disrupt groundwater flow and impact on existing groundwater abstractions. The submission must include:
- a) A map demonstrating that all existing groundwater abstractions are outwith a 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m and proposed groundwater abstractions. If micro-siting is to be considered as a mitigation measure the distance of survey needs to be extended by the proposed maximum extent of micro-siting. The survey needs to extend beyond the site boundary where the distances require it.
  - b) If the minimum buffers above cannot be achieved, a detailed site specific qualitative and/or quantitative risk assessment will be required. We are likely to seek conditions securing appropriate mitigation for all existing groundwater abstractions affected.
- 5.2 Please refer to [Guidance on Assessing the Impacts of Development Proposals on Groundwater Abstractions and Groundwater Dependent Terrestrial Ecosystems](#) for further advice on the minimum information we require to be submitted.

#### **6. Forest removal and forest waste**

- 6.1 Key holing must be used wherever possible as large scale felling can result in large amounts of waste material and in a peak release of nutrients which can affect local water quality. The supporting information should refer to the current Forest Plan if one exists and measures should comply with the Plan where possible.
- 6.2 Clear felling may be acceptable only in cases where planting took place on deep peat and it is proposed through a Habitat Management Plan to reinstate peat-forming habitats. The submission must include:
- a) A map demarcating the areas to be subject to different felling techniques.

- b) Photography of general timber condition in each of these areas.
- c) A table of approximate volumes of timber which will be removed from site and volumes, sizes of chips or brash and depths that will be re-used on site.
- d) A plan showing how and where any timber residues will be re-used for ecological benefit within that area, supported by a Habitat Management Plan. Further guidance on this can be found in [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS.](#)

## **7. Borrow pits**

- 7.1 Scottish Planning Policy states (Paragraph 243) that “Borrow pits should only be permitted if there are significant environmental or economic benefits compared to obtaining material from local quarries, they are time-limited; tied to a particular project and appropriate reclamation measures are in place.” The submission must provide sufficient information to address this policy statement.
- 7.2 In accordance with Paragraphs 52 to 57 of Planning Advice Note 50 [Controlling the Environmental Effects of Surface Mineral Workings](#) (PAN 50) a Site Management Plan should be submitted in support of any application. The following information should also be submitted for each borrow pit:
  - a) A map showing the location, size, depths and dimensions.
  - b) A map showing any stocks of rock, overburden, soils and temporary and permanent infrastructure including tracks, buildings, oil storage, pipes and drainage, overlain with all lochs and watercourses to a distance of 250 metres. You need to demonstrate that a site specific proportionate buffer can be achieved. On this map, a site-specific buffer must be drawn around each loch or watercourse proportionate to the depth of excavations and at least 10m from access tracks. If this minimum buffer cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the loch or watercourse, drawings of what is proposed in terms of engineering works.
  - c) You need to provide a justification for the proposed location of borrow pits and evidence of the suitability of the material to be excavated for the proposed use, including any risk of pollution caused by degradation of the rock.
  - d) A ground investigation report giving existing seasonally highest water table including sections showing the maximum area, depth and profile of working in relation to the water table.
  - e) A site map showing cut-off drains, silt management devices and settlement lagoons to manage surface water and dewatering discharge. Cut-off drains must be installed to maximise diversion of water from entering quarry works.
  - f) A site map showing proposed water abstractions with details of the volumes and timings of abstractions.
  - g) A site map showing the location of pollution prevention measures such as spill kits, oil interceptors, drainage associated with welfare facilities, recycling and bin storage and

vehicle washing areas. The drawing notes should include a commitment to check these daily.

- h) A site map showing where soils and overburden will be stored including details of the heights and dimensions of each store, how long the material will be stored for and how soils will be kept fit for restoration purposes. Where the development will result in the disturbance of peat or other carbon rich soils then the submission must also include a detailed map of peat depths (this must be to full depth and follow the survey requirement of the Scottish Government's [Guidance on Developments on Peatland - Peatland Survey \(2017\)](#)) with all the built elements and excavation areas overlain so it can clearly be seen how the development minimises disturbance of peat and the consequential release of CO<sub>2</sub>.
- i) Sections and plans detailing how restoration will be progressed including the phasing, profiles, depths and types of material to be used.
- j) Details of how the rock will be processed in order to produce a grade of rock that will not cause siltation problems during its end use on tracks, trenches and other hardstanding.

## **8. Pollution prevention and environmental management**

- 8.1 One of our key interests in relation to developments is pollution prevention measures during the periods of construction, operation, maintenance, demolition and restoration. A schedule of mitigation supported by the above site specific maps and plans must be submitted. These must include reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils at any one time) and regulatory requirements. They should set out the daily responsibilities of ECOWs, how site inspections will be recorded and acted upon and proposals for a planning monitoring enforcement officer. Please refer to [Guidance for Pollution Prevention \(GPPs\)](#).

## **9. Life extension, repowering and decommissioning**

- 9.1 Proposals for life extension, repowering and/or decommissioning must demonstrate accordance with [SEPA Guidance on the life extension and decommissioning of onshore wind farms](#). Table 1 of the guidance provides a hierarchical framework of environmental impact based upon the principles of sustainable resource use, effective mitigation of environmental risk (including climate change) and optimisation of long term ecological restoration. The submission must demonstrate how the hierarchy of environmental impact has been applied, within the context of latest knowledge and best practice, including justification for not selecting lower impact options when life extension is not proposed.
- 9.2 The submission needs to demonstrate that there will be no discarding of materials that are likely to be classified as waste as any such proposals would be unacceptable under waste management licensing. Further guidance on this may be found in the document [Is it waste - Understanding the definition of waste](#).

## McCormack J (Josh)

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**From:** Baranska A (Agata)  
**Sent:** 16 December 2020 11:48  
**To:** McCormack J (Josh)  
**Cc:** Econsents Admin  
**Subject:** Achany Extension Wind Farm (Previously Glencassley), ref: ECU00001930  
**Attachments:** SF response to scoping report for Glencassley 2019 re-submission.pdf

Dear Mr McCormack

thank you for consulting Scottish Forestry (SF) on updates to scoping for Achany Extension Wind Farm (previously Glencassley) – the proposed development  
The proposed updated scoping site layout (as shown on Figure 3 – Indicative Site Layout), and the Applicant's statement that the proposed development is to be accessed via existing Achany Wind Farm access track, indicate that any potential impact on forestry is unlikely, hence previous SF's scoping response, dated 2<sup>nd</sup> of September 2019, still stands (attached).

Please don't hesitate to contact me if you wish to discuss SF's response.

Kind regards

**Agata Baranska**

*Regulations & Development Manager*

Scottish Forestry

Highland & Islands Conservancy

📧 Woodlands | Fodderty Way | Dingwall | IV15 9XB

📞 Mobile: 0791 9057647

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Scottish  
Forestry / Coilltearachd  
na h-Alba

Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

## McCormack J (Josh)

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**From:** Lynda Grant <lynda\_grant@Scotways.com>  
**Sent:** 13 January 2021 09:32  
**To:** McCormack J (Josh)  
**Subject:** Re: Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping [03260]

Good morning Josh,

Thank you for the additional time in which to look at this scoping update, it is much appreciated. Having now had the opportunity to look at the documentation we have no comments to make at this time.

Kind regards  
Lynda

Lynda Grant  
Access Officer

Scottish Rights of Way and Access Society (ScotWays)  
24 Annandale Street, Edinburgh EH7 4AN  
tel/fax: 0131 558 1222  
web: [www.scotways.com](http://www.scotways.com)  
follow us on Twitter: @ScotWays  
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**From:** Josh.McCormack@gov.scot  
**Sent:** 17 December 2020 13:29  
**To:** Eleisha Fahy  
**Cc:** Lynda Grant  
**Subject:** RE: Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping [03260]

Hi Eleisha,

Thanks for your email.

An extension until 13 January is acceptable. I look forward to receiving your response.

I hope you have a lovely break when it comes.

Many thanks  
Josh

**Josh McCormack | Senior Case Officer | Energy Consents Unit**  
Scottish Government | ' : 0131 244 1177 | Mobile: 07392 285321 | ✉: [josh.mccormack@gov.scot](mailto:josh.mccormack@gov.scot)  
To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)  
To read the Energy Consents Unit's privacy notice on how personal information is used, please visit  
<http://www.energyconsents.scot/Documentation.aspx>



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**From:** Eleisha Fahy  
**Sent:** 16 December 2020 14:55  
**To:** McCormack J (Josh)  
**Cc:** Lynda Grant  
**Subject:** RE: Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping [03260]

Good afternoon Josh,

Thank you for seeking our comments on the updated scoping report for the proposed Achany Extension Wind Farm (previously Glencassley Wind Farm).

We will be pleased to look at this and provide at least outline comments. However, we are greatly overstretched by our caseload at present, particularly with the run-up towards our festive closure. If at all possible we would very much appreciate an extension beyond today's given deadline. An extension to time of at least two weeks would be preferred, which with our office closure would take us into the New Year. I assume our first (part) week back will be very full, so can I suggest at least into sometime 11-13<sup>th</sup> January? We will of course work to whatever you can offer.

Sorry for the last-minute nature of this request. Looking forward to hearing from you, and many thanks for any flexibility you can give us.

Kind regards,  
Eleisha

Eleisha Fahy  
Senior Access Officer  
Scottish Rights of Way and Access Society (ScotWays)  
24 Annandale Street, Edinburgh EH7 4AN  
tel: 0131 558 1222  
web: [www.scotways.com](http://www.scotways.com)  
follow us on Twitter: @ScotWays  
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*ScotWays closes for Christmas and New Year on Tuesday 22<sup>nd</sup> December 2020 and re-opens on Tuesday 5<sup>th</sup> January 2021: <https://www.scotways.com/news/666-christmas-and-new-year-at-scotways-2020> As we will not be at our desks for these two weeks, any search request received after 5pm on Tuesday 8<sup>th</sup> December 2020 may not be completed until after we're back on 5<sup>th</sup> January 2021.*

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**From:** [Josh.McCormack@gov.scot](mailto:Josh.McCormack@gov.scot) <[Josh.McCormack@gov.scot](mailto:Josh.McCormack@gov.scot)>  
**Sent:** 24 November 2020 14:38  
**Subject:** Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Scoping

Good afternoon,

**Achany Extension Wind Farm (Previously Glencassly Wind Farm) - Updates to Previous Scoping**



In October 2019 the ECU issued a Scoping Opinion on behalf of Scottish Ministers in relation to a request for a scoping opinion made by Ash Design & Assessment Ltd on behalf of SSE Renewables Development for the proposed section 36 application for Glencassley Wind Farm. The proposed development was for 26 wind turbines, turbine tip height would be greater than 150m, located in the planning authority area of The Highland Council.

The Scottish Ministers undertook a consultation on the scoping report and this commenced on 21 August 2019 and closed on 07 October 2019. Your organisation was included in this consultation.

On 20 November 2020 the Applicant submitted updated documents which provide further detail/changes to the proposed development detailed in the initial Scoping Report submitted in 2019. They also give notice of the project name change to Achany Extension Wind Farm.

The updates to the scoping can be viewed at the Scottish Government's Energy Consents Unit website [www.energyconsents.scot](http://www.energyconsents.scot) by:

- clicking on **Search** tab; then,
- clicking on **Simple Search** tab; then,
- typing Achany Wind Farm Extension into **Search by Project Name** box then clicking on **Go**;
- then clicking on **ECU00001930** and then click on **Documents** tab.

I would be grateful for you could consider the updated information and provide any further comments your organisation may have in addition to any previous response submitted. I would be grateful if you could provide comments by close **16 December 2020**. If you have already submitted a response in relation to the previous consultation and do not provide any additional response in light of the updates we will assume you have no further comments to make and the initial response still remains valid.

Please note that reminders will not be issued, therefore if we have not received any comments from you, nor a request for an extension to this date, we will assume that you have no comments to make.

If you have any queries regarding the above email then please do not hesitate to contact me directly.

Many thanks  
Josh

**Josh McCormack | Senior Case Officer | Energy Consents Unit**

Scottish Government | T: 0131 244 1177 | Mobile: 07392 285321 | ✉: [josh.mccormack@gov.scot](mailto:josh.mccormack@gov.scot)

To view our current casework please visit [www.energyconsents.scot](http://www.energyconsents.scot)

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SSE Renewables Developments (UK) Ltd  
c/o John McCormack  
Consents Manager  
Energy Consents Unit

Please ask for: Simon Hindson  
Direct Dial: 01463 785047  
E-mail: [simon.hindson@highland.gov.uk](mailto:simon.hindson@highland.gov.uk)  
Our Ref: 20/05107/SCOP  
Your Ref:  
Date: 05 February 2021

By email only to:

[josh.mccormack@gov.scot](mailto:josh.mccormack@gov.scot)

Dear Sir,

**PLANNING REFERENCE: 20/05107/SCOP**  
**DEVELOPMENT: ACHANY EXTENSION WIND FARM (PREVIOUSLY GLENCASSLEY WIND FARM)**  
**LOCATION: LAND 2KM NE OF GLENCASSLEY CASTLE, ROSEHALL**

Thank you for consulting The Highland Council on the updated Environmental Impact Assessment Scoping Request for the above project.

We recommend that the applicant uses the Council's Pre-Application Advice Service.

## McCormack J (Josh)

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**From:** Baranska A (Agata)  
**Sent:** 16 December 2020 11:48  
**To:** McCormack J (Josh)  
**Cc:** Econsents Admin  
**Subject:** Achany Extension Wind Farm (Previously Glencassley), ref: ECU00001930  
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Dear Mr McCormack

thank you for consulting Scottish Forestry (SF) on updates to scoping for Achany Extension Wind Farm (previously Glencassley) – the proposed development  
The proposed updated scoping site layout (as shown on Figure 3 – Indicative Site Layout), and the Applicant's statement that the proposed development is to be accessed via existing Achany Wind Farm access track, indicate that any potential impact on forestry is unlikely, hence previous SF's scoping response, dated 2<sup>nd</sup> of September 2019, still stands (attached).

Please don't hesitate to contact me if you wish to discuss SF's response.

Kind regards

**Agata Baranska**

*Regulations & Development Manager*

Scottish Forestry

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na h-Alba

Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL  
IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017  
THE ELECTRICITY WORKS (ENVIRONMENTAL  
IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017 (AS AMENDED)**

**SCOPING RESPONSE TO ENERGY CONSENTS UNIT**

**Applicant:** SSE Renewables Development (UK) Ltd

**Project:** Achany Extension Wind Farm (Previously Glencassley Wind Farm)

**Project Address:** Land 2km Ne Of Glencassley Castle, Rosehall

**Our Reference** 20/05107/SCOP

This response is given without prejudice to the Planning Authority's right to request information in connection with any statement, whether Environmental Impact Assessment Report or not, submitted in support of any future application. These views are also given without prejudice to the future consideration of and decision on any planning application received by the Council.

The Highland Council request that any Environmental Impact Assessment Report (EIAR) submitted in support of an application for the above development take the comments highlighted below into account; many of which are already acknowledged within the Scoping Report submitted. In particular, the elements of this report as highlighted in parts 3, 4 and 5 should be presented as three distinct elements.

Where responses have been received by internal consultees these are attached and should be taken as forming part of the scoping response consultation from The Highland Council. If any further responses are received these will be forwarded to you as soon as practicably possible.

**1.0 Description of the Development.**

1.1 The description of development for an EIAR is often much more than would be set out in any planning application. An EIAR must include: -

- a description of the physical characteristics of the whole development and the full land-use requirements during the operational, construction and decommissioning phases. These might include requirements for borrow pits, local road improvements, infrastructural connections (i.e. connections to the grid), off site conservation measures, etc. A plan with eight figure OS Grid co-ordinates for all main elements of the proposal should be supplied.
- a description of the main characteristics of the production processes, for instance, nature and quantity of the materials used;
- the risk of accidents, having regard in particular to substances or technologies used;
- an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light / flicker, heat, radiation, etc.) resulting from the operation of the development.
- The estimated cumulative impact of the project with other consented or operation development.

**2.0 Alternatives**

2.1 A statement is required which outlines the main development alternatives studied by the applicant and an indication of the main reasons for the final project choice. This is expected to highlight the following:

- the range of technologies that may have been considered;
- locational criteria and economic parameters used in the initial site selection;
- options for access;
- design and locational options for all elements of the proposed development (including grid connection);
- the environmental effects of the different options examined.

Such assessment should also highlight sustainable development attributes including for example assessment of carbon emissions / carbon savings.

### **3.0 Environmental Elements Affected**

- 3.1 The EIAR must provide a description of the aspects of the environment likely to be significantly affected by the development. You have a good understanding of the effects based upon the previous development and decisions. The following paragraphs highlight some principal considerations. There are a number of wind energy developments in the area and you are encouraged to use your understanding of these in assessing your development. The EIAR should fully utilise this understanding to ensure that information provided is relevant and robustly grounded.

#### **Land Use and Policy**

- 3.2 The EIAR should recognise the existing land uses affected by the development having particular regard for The Highland Council's Development Plan inclusive of all statutorily adopted supplementary guidance. Particular attention should be paid to the provisions of the Onshore Wind Energy Supplementary Guidance inclusive of any Landscape Sensitivity Appraisal. This is not instead of but in addition to the expectation of receiving a Planning Statement in support of the application itself which, in addition to exploring compliance with the Development Plan, should look at Scottish Planning Policy and Planning Advice Notes which identify the issues that should be taken into account when considering significant development. Scottish Government policy and guidance on renewable energy and wind energy should be considered in this section. Wider energy policy should also be considered within this section. The purpose of this chapter is to highlight relevant policies not to assess the compatibility of the proposal with policy. You should also consider, the implications of the NPF4 position statement and other relevant national policy. Depending on the submission timescale of the proposal, other guidance and policy may have been developed at a national and local level. These should be taken into consideration where appropriate within the EIAR.

#### **Landscape and Visual**

- 3.3 The Council expects the EIAR to consider the landscape and visual impact of the development. The Council makes a distinction between the two. While not mutually exclusive, these elements require separate assessment and therefore presentation of visual material in different ways. It is the Council's position that it is not possible to use panoramic images for the purposes of visual impact assessment. The Council, while not precluding the use of panoramic images, require single frame images with different focal lengths taken with a 35mm format full frame sensor camera – not an 'equivalent.' The focal lengths required are 50mm and 75mm. The former gives an indication of field of view and the latter best represents the scale and distance in the landscape i.e. a more realistic impression of what we see from the viewpoint. These images should form part of the EIAR and not be separate from it. Photomontages should follow the Council's Visualisation Standards:

[https://www.highland.gov.uk/downloads/file/12880/visualisation\\_standards\\_for\\_wind\\_energy\\_developments](https://www.highland.gov.uk/downloads/file/12880/visualisation_standards_for_wind_energy_developments)

Separate volumes of visualisations should be prepared to both Highland Council Standards and NATURESCOT guidance. These should be provided in hard copy. It would be beneficial for the Highland Council volume to be provided in an A3 ring bound folder for ease of use. The use of monochrome for specific viewpoints is useful where there are a number of different wind farms in the view. Without seeing wireframes it is not possible to advise on these at this time. We are happy to provide advice on this matter going forward.

All existing turbines must be re-rendered even if they appear to be facing the viewer in the photograph to ensure consistency.

- 3.4 This assessment should include the expected impact of on-site borrow pits and access roads, despite the fact that the principal structures will be a primary concern. All elements of a development are important to consider within any EIAR, including the visual impact of the tracks. A cumulative assessment of the proposed grid connection should also be included where appropriate.
- 3.5 It should be noted that there are a number of similar applications in this area which are yet to be determined / concluded in the vicinity of this application, many of these have been identified in the scoping report, which may or may not help clarify the weight towards particular policy elements in the final planning balance. We consider that you should undertake the cumulative assessment over a study area the same as the visual assessment, however if the turbines to be brought forward greater than 150m we would encourage an increase to the study area to a minimum 45km study area. As this is the case we recommend that you utilise our interactive Wind Turbine map, which is up to date as of 15 January 2021, to identify other schemes within the study area. The map can be accessed on the link below:

<http://highland.gov.uk/windmap>

Consultation should also be undertaken with Energy Consents and Deployment Unit as to scheme which are currently at Scoping Stage as these may have advanced at the same pace as your proposal. It should be noted that the Scoping report does not contain a list of proposed developments to be included in the cumulative assessment. This should be agreed with the Planning Authority and NatureScot at the earliest possible opportunity

- 3.6 Viewpoints (VP) for the assessment of effects of a proposed development must be agreed in advance of preparation of any visuals with The Highland Council. We note that the viewpoints are the same as the previous proposal on the site. However it is proposed to exclude a number of viewpoints. It is considered the following viewpoints should be reinstated:
- VP2 – while it represents similar receptors to VP8 and VP9 it is recommended that it is retained as the design of the wind farm is likely to appear different from this location.
  - VP4 – effects may be present (and potentially significant) from this area depending on scale of turbines
  - VP21 – we are content for this to be excluded from the LVIA chapter but it should to be included in the cultural heritage chapter
  - VP22 – we are content for this to be excluded from the LVIA chapter but it should be included as visual in Wild Land Assessment

Further it is considered a full visualisation pack should be provided for Seana Braigh (VP19) and Cul Mor (VP20).

We welcome the reinstatement of VP4 and VP18. An additional viewpoint is also requested from the Struie Viewpoint on the B9176 to consider impacts on visitors to this important location at the edge of the Dornoch Firth NSA.

It is noted that the revised scheme is for turbines of up to 149.9m and the ZTV is based upon that, although this is not clear from the ZZTV drawing itself. We acknowledge that there will be some micro-siting of the viewpoints to avoid intervening screening of vegetation boundary treatments etc. We would recommend that the photographer has in their mind whether the VP is representative or specific and also who the receptors are when they are taking the photos it would be helpful. We have also found

that if the photographer has a 3D model on a laptop when they go out on site it helps the orientation of the photography.

- 3.7 Please consult us on the viewpoint locations again once prior to work commencing in detail on the LVIA.
- 3.8 The detailed location of viewpoints will be informed by site survey, mapping and predicted Zones of Theoretical Visibility. Failure to do this may result in abortive work, requests for additional visual material and delays in processing applications/consultation responses. Community Council's may request additional viewpoints and it would be recommended that any pre-application discussions with the local community takes this into account. The final list of viewpoints should be agreed with the Planning Authority.
- 3.9 The purpose of the selected and agreed viewpoints shall be clearly identified and stated in the supporting information. For example, it should be clear that the VP has been chosen for landscape assessment, or visual impact assessment, or cumulative assessment, or sequential assessment, or to show a representative view or for assessment of impact on designated sites, communities or individual properties.
- 3.10 Given the scale of the turbines we would encourage an increase to the study area to a minimum 45km study area. Given the size of the turbines and we would expect that a detailed assessment of effects should be undertaken for the whole study area. We would welcome early view of wirelines to identify effects from individual viewpoints.
- 3.11 When assessing the impact on recreational routes please ensure that all core paths, the national cycle network, long distance trails, and the North Coast 500 are assessed. It should be noted that these routes are used by a range of receptors.
- 3.12 The development will further extend the number of proposals of this type in the surrounding area, necessitating appropriate cumulative impact. It is considered that cumulative impact will be a significant material consideration in the final determination of any future application. The study area for cumulative impacts should extend to a minimum of 45km. Given the cumulative impact of renewable energy in this area it is expected that the Applicant should present images for presentation within the Panoramic Digital Viewer deployed by the Council – see visualisation standards document. If the applicant wished to utilise this tool there may be an associated cost per image to be inserted which should be discussed with the Council prior to submission. To view current or determined schemes in the Council's Panoramic Viewer please see the link below:  
<http://www.highland.gov.uk/panoramicviewer>
- 3.13 The NATURESCOT 2019 landscape character assessment should be used.
- 3.14 We expect an assessment of the impact on Wild Land Areas to be included within the EIAR given the proximity to a number of Wild Land Areas and the theoretical visibility of the scheme from within wild land areas. NATURESCOT will provide further advice on this matter but we would expect the 2020 guidance to be followed not the 2017 guidance.
- 3.15 We expect an assessment of the proposal against the criterion set out in the Council's Onshore Wind Energy Supplementary Guidance to be included within the LVIA chapter of the EIAR.
- 3.16 An assessment of the impacts of the proposal on landscape should assess the impacts on any landscapes designated at a national and local scale. As part of this the impact on the Special Landscape Areas (SLA) must be undertaken using the SLA citations available from the Council's website.
- 3.17 Aviation lighting is not considered a mandatory requirement due to the proposed scale and location of the turbines. The effect of the aviation lighting should be assessed through the EIA process if any aviation based consultees require it. If it is required by consultees then a Lighting Impact Assessment will be required. If required then this is a matter that should be considered from all viewpoints. It should form part of the LVIA chapter of the EIAR but should also be considered as part of the Wild Land Assessment if aviation lighting is required. Further advice on aviation lighting is available from NATURESCOT. A more comprehensive list will be required and should include at least, all viewpoints within designated landscapes, Special Landscape Areas and within Wild Land Areas. Further the



assessment should consider all of the viewpoints which are sought through the assessment.

- 3.18 We are content that residential visual amenity is assessed within the LVIA chapter.

### **Ecology**

- 3.19 The EIAR should provide a baseline survey of the bird and animals (mammals, reptiles, amphibians, etc) interest on site. It needs to be categorically established which species are present on the site, and where, before a future application is submitted. Further the EIAR should provide an account of the habitats present on the proposed development site. It should identify rare and threatened habitats, and those protected by European or UK legislation, or identified in national or local Biodiversity Action Plans. Habitat enhancement and mitigation measures should be detailed, particularly in respect to blanket bog, in the contexts of both biodiversity conservation and the inherent risk of peat slide (see later). Details of any habitat enhancement programme (such as native- tree planting, stock exclusion, etc) for the proposed site should be provided. It is expected that the EIAR will address whether or not the development could assist or impede delivery of elements of relevant Biodiversity Action Plans.
- 3.20 The EIAR should provide a baseline survey of the plants (and fungi) and trees present on the site to determine the presence of any rare or threatened species albeit it is accepted that the likelihood is low given the present land use of the site.
- 3.21 The EIAR should address the likely impacts on the nature conservation interests of all the designated sites in the vicinity of the proposed development. It should provide proposals for any mitigation that is required to avoid these impacts or to reduce them to a level where they are not significant. NATURESCOT can also provide specific advice in respect of the designated site boundaries for SACs and SPAs and on protected species and habitats within those sites. The potential impact of the development proposals on other designated areas such as SSSI's should be carefully and thoroughly considered and, where possible, appropriate mitigation measures outlined in the EIAR. NATURESCOT provide advice on the impact on designated sites.
- 3.22 If wild deer are present or will use the site an assessment of the potential impact on deer will be required. This should address deer welfare, habitats and other interests.
- 3.23 The EIAR needs to address the aquatic interests within local watercourses, including down stream interests that may be affected by the development, for example increases in silt and sediment loads resulting from construction works; pollution risk / incidents during construction; obstruction to upstream and downstream migration both during and after construction; disturbance of spawning beds / timing of works; and other drainage issues. The EIAR should evidence consultation input from the local fishery board(s) where relevant.
- 3.24 Further advice can be found in NATURESCOT's consultation response on ecology in relation to the surveys required and the adequacy of the work already undertaken.
- 3.25 The EIAR should include an assessment of the effects on Ground Water Dependent Terrestrial Ecosystems (GWDTE). Please see the response from SEPA for detailed advice.

### **Ornithology**

- 3.26 The presence of protected species such as Schedule 1 Birds or European Protected Species must be included and considered as part of the planning application process, not as an issue which can be considered at a later stage. Any consent given without due consideration to these species may breach European Directives with the possibility of consequential delays or the project being halted by the EC. Please refer to the comments of NATURESCOT in this respect.
- 3.27 An assessment of the impacts of to birds through collision, disturbance and displacement from foraging / breeding / roosting habitat will be required for both the proposed development site and cumulatively with other proposals. The EIAR should be clear on the survey methods and any deviations from guidance on ornithology matters.

### **Noise**

- 3.28 Operational Noise

The applicant will be required to submit a noise assessment with regard to the operational phase of the development. The assessment should be carried out in accordance with ETSU-R-97 "The Assessment and Rating of Noise from Wind Farms" and the associated Good Practice Guide published by the Institute of Acoustics.

The target noise levels are either a simplified standard of 35dB LA90 at wind speeds up to 10m/s or a composite standard of 35dB LA90 (daytime) and 38dB LA90 (night time) or up to 5dB above background noise levels at up to 12m/s. The night time lower limit of 43dB LA90 as suggested in ETSU is not considered acceptable in many areas of the highlands due to very low background levels. These limits would apply to cumulative noise levels from more than one development.

### 3.29 Cumulative Noise

The noise assessment must take into account the potential cumulative effect from any other existing or consented or, in some cases, proposed wind turbine developments. Where applications run concurrently, developers and consultants are advised to consider adopting a joint approach with regard to noise assessments. The noise assessment must take into account predicted and consented levels from such developments. The good practice guide offers guidance on how to deal with cumulative issues.

The assessment should include a map showing all wind farm developments which may have a cumulative impact and all noise sensitive properties including any for which a financial involvement relaxation is being claimed.

The assessment should include a table of figures which includes the following: -

- The predicted levels from this development based at each noise sensitive location (NSL) at wind speeds up to 12m/s
- The maximum levels based on consented limits from each existing or consented wind farm development at each NSL. If any reduction is made for controlling property or another reason, this should be made clear.
- The predicted levels from each existing or consented wind farm development at each NSL.
- The cumulative levels based on consented and predicted levels at each NSL.

The assessment should also include an outline for a mitigation scheme to be implemented should noise levels from the development be subsequently found to exceed consented levels.

### 3.30 Background Noise Measurements

Background noise surveys should be undertaken in accordance with ETSU-R-97 and the Good Practice Guide. It is recommended that monitoring locations be agreed with the Council's Environmental Health Officer however, it is unlikely that they will be able to attend the installation of equipment. Where possible, sites must avoid other noise sources such as boiler flues, wind chimes, squeaking gate, rustling leaves etc. Otherwise, the results may not be valid for any other property.

Difficulties can arise where a location is already subject to noise from an existing wind turbine development. ETSU states that background noise must not include noise from an existing wind farm. The GPG offers advice on how to approach this problem and in some cases, it may be possible to utilise the results from historical background surveys. It is advised that the developer consults the Council's Environmental Health Officer at an early stage to discuss the proposed methodology.

### 3.31 Construction Noise

Planning conditions are not used to control the impact of construction noise as similar powers are available to the Local Authority under Section 60 of the Control of Pollution Act 1974. However, where there is potential for disturbance from construction noise the application will need to include a noise assessment.

A construction noise assessment will be required in the following circumstances: -

- Where it is proposed to undertake work which is audible at the curtilage of any noise sensitive receptor, out with the hours Mon-Fri 8am to 7pm; Sat 8am to 1pm

OR

- Where noise levels during the above periods are likely to exceed 75dB(A) for short term works or 55dB(A) for long term works. Both measurements to be taken as a 1hr LAeq at the curtilage of any noise sensitive receptor. (Generally, long term work is taken to be more than 6 months)

If an assessment is submitted it should be carried out in accordance with BS 5228-1:2009 "Code of practice for noise and vibration control on construction and open sites – Part 1: Noise". Details of any mitigation measures should be provided including proposed hours of operation.

Regardless of whether a construction noise assessment is required, it is expected that the developer/contractor will employ the best practicable means to reduce the impact of noise from construction activities. Attention should be given to construction traffic and the use of tonal reversing alarms.

#### Amplitude Modulation

- 3.32 Research has been carried out in recent years on the phenomenon of amplitude modulation arising from some wind turbine developments. However at this time, the Good Practice guide does not provide definitive Planning guidance on this subject. That being the case, any complaints linked to amplitude modulation would be investigated in terms of the Statutory Nuisance provisions of the Environmental Protection Act 1990.

#### Noise Exposure

- 3.33 When assessing the cumulative impact from more than one wind farm, consideration must be given to any increase in exposure time. Regardless of whether cumulative levels can meet relevant criteria, if a noise sensitive property subsequently becomes affected by wind turbine noise from more than one direction this could result in a significant loss of respite.

#### **Cultural Heritage**

- 3.34 The EIAR needs to identify all designated sites which may be affected by the development either directly or indirectly. This will require you to identify: -
- the architectural heritage (Conservation Areas, Listed Buildings) and
  - the archaeological heritage (Scheduled Monuments),
  - the landscape (including designations such as National Parks, National Scenic Areas, Areas of Great Landscape Value, Gardens and Designed Landscapes and general setting of the development.
  - the inter-relationship between the above factors.
- 3.35 We would expect any assessment to contain a full appreciation of the setting of these historic environment assets and the likely impact on their settings. It would be helpful if, where the assessment finds that significant impacts are likely, appropriate visualisations such as photomontage and wireframe views of the development in relation to the sites and their settings could be provided. Visualisations illustrating views both from the asset towards the proposed development and views towards the asset with the development in the background would be helpful.

- 3.36 Historic Environment Scotland (HES) will provide comment on the assessment methodology for heritage assets within their remit.
- 3.37 It is anticipated that HES will provide further comments on the scope of the assessment and their requirements for supporting information (including visualisations) and the potential impacts on heritage assets in their consultation response.
- 3.38 There are a large number of heritage assets in the vicinity of the development, these need to be assessed. HES have provided detailed advice on potential setting impacts.
- 3.39 We recommend that you liaise with colleagues in the Council's Historic Environment Team on the scope of the archaeological assessments.

#### **Water Environment**

- 3.40 The EIAR needs to address the nature of the hydrology and hydrogeology of the site, and of the potential impacts on water courses, water supplies including private supplies, water quality, water quantity and on aquatic flora and fauna. Impacts on watercourses, lochs, groundwater, other water features and sensitive receptors, such as water supplies, need to be assessed. Measures to prevent erosion, sedimentation or discolouration will be required, along with monitoring proposals and contingency plans. Assessment will need to recognise periods of high rainfall which will impact on any calculations of run-off, high flow in watercourses and hydrogeological matters. You are strongly advised at an early stage to consult Scottish Environment Protection Agency (SEPA) as the regulatory body responsible for the implementation of the Controlled Activities (Scotland) Regulations 2005 (CAR), to identify if a CAR license is necessary and the extent of the information required by SEPA to assess any license application.
- 3.41 If culverting should be proposed, either in relation to new or upgraded tracks, then it should be noted that SEPA has a general presumption against modification, diversion or culverting of watercourses. Schemes should be designed to avoid crossing watercourses, and to bridge watercourses where this cannot be avoided. The EIAR will be expected to identify all water crossings and include a systematic table of watercourse crossings or channelising, with detailed justification for any such elements and design to minimise impact. The table should be accompanied by photography of each watercourse affected and include dimensions of the watercourse. It may be useful for the applicant to demonstrate choice of watercourse crossing by means of a decision tree, taking into account factors including catchment size (resultant flows), natural habitat and environmental concerns. Further guidance on the design and implementation of crossings can be found on SEPA's Construction of River Crossings Good Practice Guide.
- 3.42 The need for, and information on, abstractions of water supplies for concrete works or other operations should also be identified. The EIAR should identify whether a public or private source is to be utilised. If a private source is to be utilised, full details on the source and details of abstraction need to be provided.
- 3.43 You should carry out an investigation to identify any private water supplies, including pipework, which may be adversely affected by the development and to submit details of the measures proposed to prevent contamination or physical disruption. Highland Council has some information on known supplies but it is not definitive. An on-site survey will be required.
- 3.44 It is anticipated that detailed comments will be provided on impacts on the water environment, in particular on buffers to water courses, by SEPA.

## **Geology, Hydrology and Geohydrology**

- 3.45 The EIAR must consider the risks of engineering instability relating to presence to peat on the site. A comprehensive peat slide risk assessment in accordance with the Scottish Government Best Practice Guide for Developers will be expected. Assessment should also address pollution risk and environmental sensitivities of the water environment. It should include a detailed map of peat depth and evidence that the scheme minimises impact on areas of deep peat. The EIAR should include site-specific principles on which construction method statements would be developed for engineering works in peat land areas, including access roads, turbine bases and hard standing areas, and these should include particular reference to drainage impacts, dewatering and disposal of excavated peat.
- 3.46 The EIAR should include a full assessment on the impact of the development on peat. SEPA have noted that the information collected so far shows that most of the site is on deep peat, with large areas of very deep peat. The assessment of the impact on peat must include peat probing for all areas where development is proposed. The Council are of the view this should include probing not just at the point of infrastructure as proposed by the scheme but also covering the areas of ground which would be subject to micro-siting limits.
- 3.47 SEPA have previously provided detailed comments on methodology for peat probing and the peat assessment. These comments are supported by the Council.
- 3.48 Carbon balance calculations should be undertaken and included within the EIAR with a summary of the results provided focussing on the carbon payback period for the wind farm.
- 3.49 The EIAR should fully describe the likely significant effects of the development on the local geology including aspects such as borrow pits, earthworks, site restoration and the soil generally including direct effects and any indirect. Proposals should demonstrate construction practices that help to minimise the use of raw materials and maximise the use of secondary aggregates and recycled or renewable materials. Where borrow pits are proposed the EIAR should include information regarding the location, size and nature of these borrow pits including information on the depth of the borrow pit floor and the borrow pit final reinstated profile. This can avoid the need for further applications.

## **Roads Infrastructure**

- 3.50 Highland Council's Transport Planning Teams interests will relate largely to the impact of development traffic on the Council maintained road network and its users during the construction phase of the project. It has confirmed that it is generally satisfied with the proposed changes to the methodology. The community have also raised concerns around these matters.
- 3.51 A Transport Assessment (TA), or section on traffic and transportation, within the Environmental Statement for the project will be required. The TA should identify all roads likely to be affected by the various stages of the development and consider in detail the impact of development traffic, including abnormal load movements, on these roads. Where necessary, the TA should consider and propose measures necessary to mitigate the impact of the development on the road network. Prior to preparation of the TA the developer should first carry out a detailed scoping exercise in consultation with the Council, as local roads authority and, as required, Transport Scotland as trunk roads authority.
- 3.52 Matters to be included in the Transport Assessment/Transport Statement:
- Identify all public roads affected by the development. In addition to transport of major components this should also include routes to be used by local suppliers.
  - Establish current condition of the roads. This work which should be undertaken by a consulting engineer acceptable to the Council and will involve an engineering appraisal of the routes including the following:
    - assessment of structural strength of carriageway including construction depths and road formation where this is likely to be significant in respect of proposed impacts,

including non-destructive testing and sampling as required.

- road surface condition and profile
- assessment of structures and any weight restrictions
- road widths, vertical and horizontal alignment and provision of passing places;
- details of adjacent communities
- Traffic resulting from the proposed development including: -
  - nos. of light and heavy vehicles
  - abnormal loads. In respect of long loads trial runs are required.
  - duration of works
- Current traffic flows including use by school buses, refuse vehicles, commercial users, pedestrians, cyclists and equestrians.
- Impacts of proposed traffic including: -
  - impacts on carriageway, structures, verges etc.
  - impacts on other road users
  - impacts on adjacent communities
  - swept path and gradient analysis where it is envisaged that passage of traffic could be problematic.
- Cumulative impacts with other developments in progress and committed developments.
- Proposed mitigation measures to address impacts identified above including: -
  - details of the proposed site access at its junction with the public road to the standards set out in The Highland Council's Roads and Transportation Guidelines for New Developments available online at:  
<http://www.highland.gov.uk/yourenvironment/roadsandtransport/roads/roadsandtransportguidelinesfornewdevelopments.htm>
  - carriageway strengthening
  - strengthening of bridges and culverts
  - carriageway widening and/or edge strengthening
  - provision of passing places
  - road safety measures
  - traffic management including measures to be taken to ensure that development traffic does not use routes other than the approved routes.
  - Details of residual effects.

3.53 The EIAR must consider the implications on the Trunk Road network as part of the EIAR process.

#### **Socio-Economic, Recreation and Tourism**

3.54 We consider that this should have its own chapter in the EIAR to ensure that these matters are appropriately addressed and not lost in other assessments. The EIAR should estimate who may be affected by the development, in all or in part, which may required individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity



associated with the procurement, construction, operation and decommissioning of the development.

- 3.55 Estimations of who may be affected by the development, in all or in part, which may required individual households to be identified, local communities or a wider socio economic groupings such as tourists & tourist related businesses, recreational groups, economically active, etc should be included. The application should include relevant economic information connected with the project, including the potential number of jobs, and economic activity associated with the procurement, construction, operation and decommissioning of the development. In this regard wind farm development experience in this location should be used to help set the basis of likely impact. This should set out the impact on the regional and local economy, not just the national economy. Any mitigation proposed should also address impacts on the regional and local economy.
- 3.56 The site is on land with access rights provided by the Land Reform Scotland Act. Access rights on a core path are not enhanced but they are more protected during construction and similar activities. In line with the policies and provisions of the Highland-wide Local Development Plan a plan detailing the following should be submitted as part of the EIAR:
- Existing public non-motorised public access footpaths, bridleways and cycleways on the site and any proposed access route from the public road infrastructure; and
  - Proposed public access provision both during construction and after completion of the development, including links to existing path networks (where appropriate) and to the surrounding area, and access points to water.
  - Impacts of the proposed development on the core paths and proposed mitigation if any.

The application should be accompanied by an Access Management Plan.

#### **Effects on Existing Infrastructure**

- 3.57 The EIAR needs to recognise community assets that are currently in operation for example TV, radio, tele-communication links, aviation interests including radar, MOD safeguards, etc. In this regard the applicant, when submitting a future application, will need to demonstrate what interests they have identified and the outcomes of any consultations with relevant authorities such as Ofcom, NATS, BAA, CAA, MOD, Highlands and Islands Airports Ltd, etc. through the provision of written evidence of concluded discussions / agreed outcomes. We consider the results of these surveys should be contained within the EIAR to determine whether any suspensive conditions are required in relation to such issues.
- 3.58 There should be continued dialogue with HIAL over the impact on the radar at airports in the area.
- 3.59 If there are no predicted effects on communication links as a result of the development, the EIAR should still address this matter by explaining how this conclusion was reached.

#### **Shadow Flicker**

- 3.60 If there are no properties within 11 rotor diameters, which is the Council's approach to shadow flicker due to the lower sun given the latitude of the development, the matter of shadow flicker will not require detailed assessment but should still be addressed in the EIAR.

#### **Trees and Forestry**

- 3.61 Within the boundary of the application site there limited areas of woodland albeit some areas of woodland adjacent to the access may be affected. If any areas of woodland likely to be affected by the development (including its access) the Scottish Government's Control of Woodland removal Policy must be addressed and compensatory planting calculations provided in the EIAR.
- 3.62 The EIAR should indicate all the areas of woodland / trees that will felled to accommodate the development, including any off site works / mitigation. Compensatory woodland is a clear expectation of any proposals for felling, and thereby such mitigation needs to be considered within any assessment. If

so minded, permission is only likely to be granted on the basis that compensatory planting proposals are identified in advance. Compensatory planting should be within the Highland area and not form part of an already approved forestry plan/proposal that has gained FC funding. Areas of retained forestry or tree groups should be clearly indicated and methods for their protection during construction and beyond clearly described. If timber is to be disposed of, details of the methodology for this should be submitted. This matter does not require to be contained within the EIAR but should be included in a separate assessment submitted with the application.

#### **Other Matters**

- 3.63 We consider that the EIAR needs to address existing air quality and the general qualities of the local environment including background noise, sunlight, prevailing wind. From this base data information on the expected impacts of any development can then be founded recognising likely impacts for each phases of development including construction, operation and decommissioning. Issues such as dust, air borne pollution and / or vapours, noise, light, shadow-flicker can then be highlighted.
- 3.64 Depending on the proximity of the working area to houses etc. the applicant may require to submit a scheme for the suppression of dust during construction. Particular attention should be paid to construction traffic movements.
- 3.65 The EIAR needs to address all relevant climatic factors which can greatly influence the impact range of many of the preceding factors on account of seasonal changes affecting, rainfall, sunlight, prevailing wind direction, etc.
- 3.66 We note that the Report seeks to cover a number of the matters within the CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application.

#### **4.0 Significant Effects on the Environment**

- 4.1 Leading from the assessment of the environmental elements the EIAR needs to describe the likely significant effects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the development, resulting from: -
- the existence of the development;
  - the use of natural resources;
  - the emission of pollutants, the creation of nuisances and the elimination of waste.
- 4.2 The potential significant effects of development must have regard to: -
- the extent of the impact (geographical area and size of the affected population);
  - the trans-frontier nature of the impact;
  - the magnitude and complexity of the impact;
  - the probability of the impact;
  - the duration, frequency and reversibility of the impact.
- 4.3 The effects of development upon baseline data should be provided in clear summary points.
- 4.4 The Council requests that when measuring the positive and negative effects of the development a four point scale is used advising any effect to be either strong positive, positive, negative or strong negative.
- 4.5 The applicant should provide a description of the forecasting methods used to assess the effects on the environment.



## 5.0 **Mitigation**

- 5.1 Consideration of the significance of any adverse impacts of a development will of course be balanced against the projected benefits of the proposal. Valid concerns can be overcome or minimised by mitigation by design, approach or the offer of additional features, both on and off site. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment must be set out within the EIAR statement and be followed through within the application for development.
- 5.2 The mitigation being tabled in respect of a single development proposal can be manifold. Consequently the EIAR should present a clear summary table of all mitigation measures associated with the development proposal. This table should be entitled draft Schedule of Mitigation. As the development progresses to procurement and then implementation this carries forward to a requirement for a Construction Environmental Management Document (CEMD) and then Plan (CEMP) which in turn will set the framework for individual Construction Method Statements (CMS). Further guidance can be obtained at  
[http://www.highland.gov.uk/NR/ronlyres/485C70FB-98A7-4F77-8D6B-ED5ACC7409C0/0/construction\\_environmental\\_management\\_22122010.pdf](http://www.highland.gov.uk/NR/ronlyres/485C70FB-98A7-4F77-8D6B-ED5ACC7409C0/0/construction_environmental_management_22122010.pdf)  
This is currently under review by a working party led by SEPA working through Heads of Planning Scotland but for the time being remains relevant.
- 5.3 The implementation of mitigation can often involve a number of parties other than the developer. In particular local liaison groups involving the local community are often deployed to assist with phasing of construction works – abnormal load deliveries, construction works to the road network, borrow pit blasting. It should be made clear within the EIAR or supporting information accompanying a planning application exactly which groups are being involved in such liaison, the remit of the group and the management and resourcing of the required effort.

If you would like to discuss this scoping response please contact the Planning Authority using the details at the end of this response.

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Your ref:  
ECU00001930

Our ref:  
GB01T19K05

Date:  
11/12/2020

Dear Sirs,

## **ELECTRICITY ACT 1989**

### **THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017**

#### **ACHANY EXTENSION WIND FARM (PREVIOUSLY GLENCASSLY WIND FARM) - UPDATES TO PREVIOUS SCOPING**

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Refresh Letter (SRL) prepared by SSE Renewables in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, we would provide the following comments.

#### **Proposed Development**

We understand that in August 2019, the applicant submitted a Scoping Report (SR) for the proposed Glencassly Wind Farm, which comprised 26 turbines with a tip height of 'greater than 150m', located on the Glencassley and Glenrossal Estates near Lairg, in Sutherland.

Transport Scotland was consulted on that SR and we provided comment in our letter dated 11th Sept 2019, a copy of which is included within the Energy Consents Unit's Scoping Opinion at location A57.

#### **Project Update**

We note from the SRL that following technical analysis and environmental survey works carried out since the 2019 Scoping Report, the site design evolution has been progressed and an indicative site layout has evolved. The development content now comprises 20 turbines with a maximum tip height of approximately 149.9m, with the turbine locations moved such that they now form an extension to the existing operational Achany Wind Farm.

The SRL states within Table 1 that the changes in the design of the development will have no effect on the Traffic and Transport elements as described within the 2019 Scoping Opinion.

## **Conclusions**

As there are no predicted changes to the Traffic and Transport elements of the project, Transport Scotland is satisfied that the comments provided in our previous response of 11<sup>th</sup> Sept 2019 remain valid, and we have no further comment to make at this stage.

I trust that the above is satisfactory and should you wish to discuss in greater detail, please do not hesitate to contact Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully  
[Redacted]

**Gerard McPhillips**

**Transport Scotland  
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.