

Chapter 15: Other Issues

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15. Other Issues

15.1. Introduction

- 15.1.1. SSE Generation Limited (“the Applicant”) is proposing to vary Achany Extension Wind Farm (hereafter ‘the Consented Development’) to increase the height of all 18 turbines to a new maximum tip height of up to 200m (hereafter ‘the Proposed Varied Development’).
- 15.1.2. **Chapter 17** of the **2021 EIAR** set out the likely significant effects of any ‘Other Issues’ that required consideration in an EIA Report under Regulations 4(3) and 4(4), and Schedule 4 of the 2017 EIA Regulations¹. The topics included were:
- Forestry
 - Air Quality
 - Shadow Flicker
 - Ice Throw
 - Telecommunications, TV & Radio Links
 - Climate Change
 - Population and Human Health
 - Risk of Major Accidents and / or Disasters
- 15.1.3. The 2021 EIAR found that, subject to appropriate mitigation in some cases, there would be no significant effects created by the Consented Development with regards to each of the above topics.

15.2. Consultations

- 15.2.1. Consultations regarding ‘Other Issues’ with statutory consultees, that were received prior to the 2021 EIAR being submitted, are outlined in the **2021 EIAR, Chapter 17: Other Issues**.
- 15.2.2. The Scoping Report for the Proposed Varied Development (**Technical Appendix 3.1: Scoping Report**) provides the rationale for scoping out each of the ‘other issues’ listed above. All issues were scoped out on the basis that there would be no risk of an increased impact by the Proposed Varied Development when compared to the Consented Development. The scoping responses relevant to ‘other issues’ are summarised in **Table 15.1**.

¹ Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. Available at: <http://www.legislation.gov.uk/ssi/2017/101/contents/made> (Accessed 15th September 2025).

15.2.3. **Table 15.1** sets out relevant consultee responses with respect to ‘Other Issues’ following submission of the Scoping Report for the Proposed Varied Development (**Technical Appendix 3.2**).

Table 15.1: Consultee Responses to the Proposed Varied Development

Consultee	Summary of Key Issues	Response to Comments
THC Scoping Response 25 July 2025	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.	The outcomes of relevant consultations can be found within this table, and as part of Technical Appendix 3.2 (scoping consultation responses).
THC Scoping Response 25 July 2025	Consideration must also be given to the potential health and safety risks associated with lightning strikes and ice throw given the proximity of recreational routes through the site.	These topics were previously considered and scoped out of the 2021 EIAR . The Proposed Varied Development presents no change to the risk factors for lightning strikes or ice throw, and no change to the originally proposed mitigation measures is needed.
THC Scoping Response 25 July 2025	A number of the aforementioned matters could be addressed by a CEMD for the proposal. While acceptable in principle we would request that an Outline CEMD is included with the application	The Applicant provided an Outline CEMP (Construction Environment Management Plan) as part of the 2021 EIAR, Volume 4 Technical Appendix 3.1 . The mitigation presented in the CEMP is still applicable for the Proposed Varied Development.
THC Scoping Response 25 July 2025	The Council's Forestry Officer was consulted, and noted the proposed development does not appear to involve any significant adverse impact on existing trees or woodland. Therefore, no further comments have been made	Noted.
THC Scoping Response 25 July 2025	As it stands, a specific chapter on Forestry is required as the layout of the access road, turbines or associated infrastructure will impact on Forestry. Paragraph 3.99 confirms that ‘The Council’s Forestry Officer	The Applicant sought further clarification (26 August 2025) on the contradictory paragraphs provided in the response. THC responded (17 Sept 2025) confirming the response

	<p>was consulted, and noted the proposed development does not appear to involve any significant adverse impact on existing trees or woodland. Therefore, no further comments have been made.'</p> <p>Paragraph 3.100 then continues to require a Forestry chapter, citing that the 'layout of the access road, turbines or associated infrastructure will impact on Forestry.</p>	<p>was "standard wording, however if there is any felling required for HGV and/or AIL movements, this should also be included in the submission and details of appropriate compensatory planting proposals". Details are provided in Section 15.4 of this chapter.</p>
<p>BT</p> <p>Scoping Response</p> <p>27th June 2025</p>	<p>We have studied this proposal using the below co-ordinates with respect to EMC and related problems to BT point-to-point microwave radio links.</p> <p>The conclusion is that this proposal should not cause interference to BT's current and presently planned radio network</p>	<p>Noted. No further assessment required.</p>
<p>Joint Radio Company (JRC)</p> <p>Scoping Response</p> <p>20th June 2025</p>	<p>This proposal is *cleared* - subject to 50m Micrositing - with respect to radio link infrastructure operated by the local energy networks.</p>	<p>Noted. No further assessment required.</p>
<p>Met Office</p> <p>Scoping Response</p> <p>16th June 2025</p>	<p>The proposal would be approx. 94 km from our nearest weather radar.</p> <p>There is potential that the wind turbines would be detected by the weather radar and have an impact on the data received. However, the proposal is outside any of our standard 20 km consultation zones and we would [be] able to manage any impacts on products and services derived from the weather radar data.</p>	<p>Noted. No further assessment required.</p>
<p>Creich Community Council</p> <p>Scoping Response</p> <p>02 July 2025</p>	<p>Peaceful Environments: To include a report on the health and wellbeing of every resident that will be affected by the project – not just visually - on both sides of the Kyle of Sutherland. This must include visualisation of night lighting and flicker</p> <p>Antisocial: To include the effect on of strobing and shadow casting for every home, the full length of the Kyle of Sutherland 5 km from north bank. This must</p>	<p>A report on the health and wellbeing of every resident is outwith the scope of EIA.</p> <p>Night lighting has been discussed in, Chapter 5: Landscape and Visual Impact, and visualisations are included in Volume 3a. Shadow flicker is scoped out of this report as discussed in the Scoping Report (Technical Appendix 3.1) and this chapter. It would not be possible to</p>

include a sun shadow report for a full year, detailing the area a shadow will be cast from each turbine.	visualise shadow flicker for the Proposed Varied Development as there are no receptors within range.
Major Incidents and Disasters: Due to the remote location of the site, proximity to fragile landscapes, and tributaries, the developer should be required to engage with SEPA, the Health and Safety Executive, and the Scottish Fire Service. The engagement must provide enough information for the relevant bodies to determine response times, specialist emergency personnel, equipment and environmental responsibilities. The results of this will affect local authority and Scottish Government expenditure so therefore is relevant to the public.	SEPA and the HSE have been engaged with as part of this consultation. The Scottish Fire Service are consulted as required during construction and operation of the Development.

15.3. Shadow Flicker

- 15.3.1. The Scottish Government's Online Planning Guidance for Onshore wind Turbines¹ states that shadow flicker is unlikely to be a problem where there is at least 10 rotor diameters separation between turbines and dwellings. Additionally, THC requests that assessment should be done based on a distance of 11 rotor diameters, to take into account low-lying sun conditions that cast shadows further, due to the more northern latitudes of THC's boundaries in comparison to the rest of Scotland².
- 15.3.2. The 2021 EIAR stated the nearest occupied property to be Glencassley Castle, located 1.7km from the nearest turbine; as this is more than 11 rotor diameters, there is no potential for shadow flicker effects to occur, and no further assessment is required.
- 15.3.3. **Figure 15.1** shows the nearest dwellings to the proposed turbine locations of the Proposed Varied Development and a 1,518m buffer (11x the largest proposed rotor diameter of 138m). It should be noted that this figure presents only the *potential* area of shadow flicker and does not take account of terrain or other topographical features which may further block shadow flicker. On this basis, no dwellings are located within 11 rotor diameters of a turbine, and therefore shadow flicker effects are considered to be **not significant**.

² https://www.highland.gov.uk/download/downloads/id/16949/onshore_wind_energy_supplementary_guidance-currently_adopted_suite.pdf

15.4. Forestry

15.4.1. No tree felling is required at the Proposed Varied Development site.

15.4.2. Minor vegetation clearance and limited tree removal works may be required at specific points along the public road network to facilitate safe and unobstructed transport of turbine components. These works are limited in scope and duration and relate to areas where tree canopy or vegetation trimming and/or individual tree removal may be required. The individual trees will be dispersed and do not form part of any continuous woodland block. Based on the definition provided by Scottish Forestry and referenced in Scotland's Environment³, woodland is defined as:

"Land of at least 0.1 hectares under stands of trees with a canopy cover of at least 20%, or having the potential to achieve this."

15.4.3. The extent of the tree works along the turbine delivery route will not therefore constitute removal of woodland under the Control of Woodland Removal Policy Implementation Guidance (2019) or the Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017. Furthermore, the nature of the works, primarily vegetation trimming and removal of a small number of trees for temporary access, aligns with exemptions listed in Annex 3 of the Woodland Removal Policy, which states that compensatory planting is not required for:

- Minor or temporary removals for access or safety;
- Works that do not result in permanent land-use change; and
- Tree works by or on behalf of statutory undertakers.

15.4.4. Tree removal works will be undertaken in adherence to the protected species monitoring and mitigation requirements as set out in the Outline CEMP (Construction Environment Management Plan) provided in **2021 EIAR, Volume 4, Technical Appendix 3.1**.

15.5. Conclusion

15.5.1. The Scoping Report for the Proposed Varied Development (**Technical Appendix 3.1**) proposed that no further assessment of effects of the 'Other Issues' is required within the EIAR and therefore is 'scoped out.'

15.5.2. Due to the increase in turbine height for the Proposed Varied Development, shadow flicker has been verified and it is concluded that no significant effects are predicted. This presents no change from the previous assessment concluded for the Consented Development.

³ <https://www.environment.gov.scot/our-environment/habitats-and-species/woodland-and-forests>, accessed 22 Sept 2025.

- 15.5.3. Given the limited scale of tree removal and the absence of woodland-level impact, it is concluded that these works do not constitute woodland removal under Scottish Forestry definitions. On this basis compensatory planting is not deemed to be required.
- 15.5.4. After consultation with key stakeholders through the scoping responses (**Technical Appendix 3.2**), it has been determined that 'Other Issues' can remain scoped out, as the Proposed Varied Development's changes do not create a risk of significant impact on any of the relevant topics.

15.6. References

Control of Woodland Removal Policy: Implementation Guidance. Edinburgh: Scottish Forestry. Scottish Government (2019).

Forestry (Environmental Impact Assessment) (Scotland) Regulations 2017.

Scotland's Environment, Woodland and Forests. <https://www.environment.gov.scot/our-environment/habitats-and-species/woodland-and-forests>,