Chapter 1: Introduction

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1. Introduction

1.1. Preface

1.1.1. SSE Generation Limited (hereafter referred to as 'the Applicant') has submitted an application to the Scottish Ministers via the Scottish Government Energy Consents Unit (ECU) under Section 36C ('the S36C application') of the Electricity Act 1989 ('the 1989 Act'). The S36C application proposes to vary the Section 36 consent granted by the Scottish Ministers on 22nd May 2023 for the construction and operation of the Achany Extension Wind Farm (the 'Consented Development') located on the Glencassley Estate, near Lairg in Sutherland.

1.1.2. The principal variation requested to the Consented Development is to increase the tip height of the 18 turbines from 149.9m to up to 200m, with related minor changes to infrastructure. More detailed information regarding the Proposed Varied Development is presented in Section 1.5 of this Chapter and in Chapter 2: Design Iteration and Proposed Varied Development.

1.1.3. In addition, the Applicant is seeking a direction under section 57(2) of the Town and Country Planning (Scotland) Act 1997 ('the 1997 Act') to the effect that planning permission would be deemed to be granted in respect of the Proposed Varied Development, ('the s57(2) direction'). References to the S36C application in this Environmental Impact Assessment Report (EIAR) should be read as including the request for the s57(2) direction, as the context requires.

1.1.4. A copy of the S36C application will be served on the planning authority, The Highland Council (THC), and notice given to the owner and occupiers of the land to which the S36C application relates, in accordance with Regulation 4(2)(b) and (d) of the Electricity Generating Stations (Applications for Variation of Consent) (Scotland) Regulations 2013, as amended ('the 2013 Regulations'). The publication requirements of the same Regulation and Part 5 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 (As amended) (hereafter referred to as the '2017 EIA Regulations') will be complied with in relation to this EIAR, as further explained below.

1.1.5. A scoping request for the Proposed Varied Development application was submitted to Scottish Ministers on 13 June 2025 and was supported by a Scoping Report (**refer Technical Appendix 3.1**). Scottish Ministers subsequently provided a Scoping Opinion on 13 August 2025 (**refer Technical Appendix 3.2**).

1.1.6. Achany Extension Wind Farm has been subject to two previous design iterations over the life of the project, and the layout has evolved to respond to feedback from consultees and a collection of additional environmental data. The principal iterations are summarised in the following 2021 EIAR and 2022 Additional Information Report (AIR):

- 2021 EIAR for 20 wind turbines generators (WTGs); and
- 2022 AIR to modify the scheme to 18 WTGs - the Consented Development layout.

1.1.7. This EIAR is provided in 5 volumes:

- Volume 1: Non-Technical Summary;
- Volume 2: EIA Report;
- Volume 3: Figures;
- Volume 3a: Photomontages (NatureScot);
- Volume 3b: Photomontages (The Highland Council);
- Volume 4: Technical Appendices; and
- Volume 5: Confidential Annex.

1.1.8. Additional documentation that has been submitted with the S36C application for consent includes:

- Planning Statement;
- Maximising Socio-Economic Benefits Framework Report;
- Pre-Application Consultation (PAC) Report; and
- Cover letter.

1.1.9. This EIAR and other documents lodged in relation to the S36C application will be available to view on the Scottish Government's portal:

https://www.energyconsents.scot/ApplicationSearch.aspx)

1.1.10. In accordance with Regulation 4(2)(a) of the 2013 Regulations, application documents, including this EIAR, will also be available to view on the Applicant's website: https://www.sserenewables.com/onshore-wind/in-development/achany-extension/

1.1.11. The application and this EIAR will be advertised in accordance with the relevant legislative requirements under the 2013 Regulations and the 2017 EIA Regulations as follows:

- On the Applicant's website;
- The Herald; The Northern Times; and The Edinburgh Gazette.

1.1.12. Hard copies of the EIAR will be made available for viewing at the following locations:

- The Highland Council HQ – Glenurquhart Road, Inverness, IV3 5NX
- Carnegie Library – Bonar Bridge IV24 3EA; and
- Lairg Library – The Main St, Lairg, IV27 4DD.

1.1.13. The Applicant will work closely with the ECU to ensure all statutory consultees receive a physical copy of this EIAR upon request. In the interests of sustainability, preference for the paperless version is strongly encouraged. For anyone who has difficulty accessing the documentation online, hard copies of the EIAR may be obtained from SSE Generation Limited (contact: SSE Generation Ltd, FAO Onshore Development Team, 1 Waterloo Street, Glasgow, G2 6AY or OWSBSupport@sse.com) at a charge of £1,500 per copy, or £15 per disk/USB memory stick. Hard copies of a short Non-Technical Summary are available free of charge.

1.1.14. Any representations in respect of the application may be submitted via the Energy Consents Unit (ECU) website at www.energyconsents.scot/Register.aspx; by email to The Scottish Government, Energy Consents Unit mailbox at representations@gov.scot or by post, to The Scottish Government, Energy Consents Unit, 4th Floor, 5 Atlantic Quay, 150 Broomielaw, Glasgow, G2 8LU, identifying the proposal and specifying the grounds of representation.

1.1.15. Written or emailed representations should be dated, clearly stating the name (in block capitals), full return email and postal address of those making representations. Only representations sent by email to representations@gov.scot will receive acknowledgement.

1.1.16. All representations should be received not later than the date falling 30 days from the date of the last published notice, although Ministers may consider representations received after this date. Any subsequent additional information which is submitted by the Applicant will be subject to further public notice in this manner, and representations to such information will be accepted as per this notice.

1.2. Introduction & Background

1.2.1. As described in the Preface to this Chapter, the Applicant is submitting a S36C application to Scottish Ministers under the 1989 Act. The S36C application proposes the variation of the Section 36 consent granted by Scottish Ministers on 22nd May 2023 under the 1989 Act. In addition, the Applicant is seeking a direction under Section 57(2) of the 1997 Act to the effect that planning permission would be deemed to be granted in respect of the Proposed Varied Development.

1.2.2. The application for the Consented Scheme was submitted to the Energy Consents Unit by the Applicant on 21st July 2021 and subsequently approved on 22nd May 2023. The Applicant was fully committed to commencing construction of the Consented Scheme, however, due to factors and challenges affecting the onshore wind industry, the project economics were considered unsuitable, and the project was put on hold. After a detailed project feasibility review, the Applicant has established that increasing the tip height of the WTGs from the consented 149.9m up to a maximum of 200m would substantially increase the energy output from the site and therefore the overall financial viability. This inevitably requires changes to hardstands and minor access track modifications, however the turbine locations for the Proposed Varied Development remain unchanged from the Consented Scheme.

1.3. Consultation

1.3.1. A request for a Scoping Opinion was submitted to the Scottish Ministers on 22 May 2025, in accordance with Regulation 12 of the 2017 EIA Regulations. Going live on the ECU portal on 13 June 2025, the request was accompanied by the 2025 Scoping Report (**Technical Appendix 3.1: Scoping Report**), which set out a summary description of the Proposed Varied Development, identified the effects proposed to be included in the EIAR and proposed an approach to the assessment of impacts in each case. The 2025

Scoping Report was issued to relevant statutory and non-statutory consultees and published on the ECU website. A Scoping Opinion was provided by the Scottish Minsters on 13 August 2025, a copy of which, along with the consultation responses, is presented in **Technical Appendix 3.2: Scoping Opinion and Consultation Responses.**

1.3.2. **Technical Appendix 3.3** of this EIA Report contains records of further consultation with specific consultees post-receipt of the Scoping Opinion, in which the Applicant and the consultees further developed and, in some cases, updated the consultee's view of what would be required for the Proposed Varied Development EIA Report. Relevant comments are also listed and addressed at the beginning of each technical chapter of this EIA Report.

1.3.3. There is no statutory requirement for pre-application consultation on Section 36C variation applications; however, the Applicant carried out two public consultation events prior to this submission, at one venue in June 2025, and at two in August 2025. Full details of these events and their outputs can be found in the Pre-Application Consultation (PAC) Report submitted to support the S36C application. Feedback collected from the public consultation events, alongside the return of the scoping opinion, influenced this final submission, including the addition of further peat probing for more extensive assessment of geological impacts.

1.4. Needs Case and Benefits

1.4.1. The Proposed Varied Development is required because the Consented Development is no longer a commercially viable project in its current form. This is due to a wide range of economic challenges currently facing the onshore wind sector, including supply chain cost escalation, which resulted in the project being uncompetitive in the 2024 AR6 CfD auction. Other factors included the significantly higher Transmission Network Use of System (TNUoS) costs in the North of Scotland, and the threat of zonal pricing (now defunct). All of these factors together significantly increased the risk profile for the project.

1.4.2. Following a thorough and robust internal review of the design of the Consented Development, the Applicant seeks to increase the energy output of the project by increasing the height of the wind turbine generators (WTG). Without the taller turbines, the Consented Development would be an unviable project and would not proceed to construction. The opportunity to establish a wind farm at this location with all the associated benefits that a wind farm development can bring would be irrevocably lost.

1.4.3. On 28 April 2019, Scotland's First Minister declared a climate emergency. Following this declaration, the Climate Change (Emissions Reduction Targets) (Scotland) Act 2019 ("the 2019 Act") was passed by the Scottish Parliament to amend the Climate Change (Scotland) Act 2009. The 2019 Act commits Scotland to reducing its greenhouse gas emissions to net-zero by 2045 at the latest. This compares with the UK Government target of net-zero by 2050.

1.4.4. The Proposed Varied Development will help to achieve UK and Scottish Government net-zero and emission reduction target. It will also reduce the UK's dependence on volatile fossil fuel markets, by improving domestic energy production and making the UK more self-sufficient when it comes to the energy it uses.

1.4.5. A Maximising Socio-Economic Benefits Framework Report has been submitted to support the S36C application. This report details how the project would bring a wealth of socio-economic benefits to the local community, including the creation of jobs and opportunities for local businesses and suppliers during the construction phase and for the lifetime of the project. As previously committed for the Consented Development, a community investment fund will be established for the Proposed Varied Development valued at £5,000 per Mega Watt (MW) installed wind energy capacity per year and index linked to CPI. The funding will be available once main construction starts and will remain in place for the operational life of the project.

1.4.6. Further details on the statutory and policy framework are provided in Chapter 4: Planning Policy and Context (EIAR Volume 2) and the Planning Statement submitted to support the S36C application. In summary, and taking account of the policy context, there are several benefits associated with the proposed increase in WTG tip height which include but are not limited to the following:

- the Proposed Varied Development would make a considerably more valuable contribution to the achievement of the UK and Scottish Government 'whole system' targets to decarbonise energy consumption by increasing the zero-carbon energy yield;
- the larger WTG dimensions would improve the commercial viability of the project by increasing the energy yield; and
- the increase in energy production would supply more homes with clean, renewable energy and an equivalent increase in CO2 reduction, making a valuable contribution to the Scottish Climate Change Plan targets.

1.5. Proposed Variations to the Consented Scheme

1.5.1. The Proposed Varied Development comprises a generating station, consisting of a wind farm with 18 WTGs of up to a maximum height of 200m from ground to blade tip when vertical, supported by ancillary development. The total installed capacity of the Proposed Varied Development, whilst dependent on the rated power of the turbine model procured, is anticipated to be approximately 81MW. This has not changed when compared to the Consented Development.

1.5.2. The Applicant is seeking to vary the Description of Development as described in Annex 1 of the Consented Development Section 36 decision letter by changing the specification of the proposed WTGs as summarised in **Table 1.1**:

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

S36 Consent Annex 1 Description of Development	S36C Description of Development Amendments Proposed for the Proposed Varied Development Application
18 turbines each with a maximum blade tip height of up to 149.9m	18 turbines each with a maximum blade tip height of up to 200m. Turbine locations remain unchanged from the Consented Development layout.
Blade length of 68m	Nominal blade length has increased to 69m.
Rotor Diameter of 136m	Rotor Diameter may decrease or increase depending on the tip height and blade length variance.
Crane hardstandings for each turbine	The size of the hardstands has increased to reflect the requirements of a larger WTG.
An onsite substation	The transformer configuration is expected to change slightly, requiring an updated indicative design drawing.
Access Tracks	Optimisation of onsite access tracks, including a reduction in total length.
No turning heads	Addition of eight turning heads to accommodate turbine supplier delivery requirements.
Infra-red lighting solution	A new Aviation Lighting Solution needs to be agreed with consultees that reflects the requirements for increased tip height triggering the need for visible aviation lighting.

1.5.3. As mentioned in **Table 1.1**, the Applicant has also reviewed the on-site access tracks and proposes some minor track realignments, slight re-orientation of some crane hardstands and addition of eight turning heads. Due to changes in the specifications and availability of potential candidate WTGs, the nominal maximum rotor diameter of the WTGs has changed from 136m assessed in the 2021 EIAR to 138m assessed in this EIAR. This will have no impact to the design layout, nor alter the maximum tip height of 200m, but will be factored into all relevant assessments in the technical chapters of the comparative EIAR. No other changes to the consented design are proposed.

1.5.4. More detailed information regarding the rationale for the proposed variations is presented in Chapter 2: Design Iteration & Proposed Varied Development.

1.5.5. Figures to support this Chapter in describing the Proposed Varied Development and enable comparison with the Consented Development are presented in EIAR Volume 3 and summarised below in **Table 1.2**:

Table 1.2: Proposed Varied Development & EIAR Supporting Figures

Figure Title	Information Source	Comment
Figure 1.1 Site Location Plan	2022 AIR	No change from 2022 AIR Consented Development Layout (18 turbine layout).
Figure 1.2 and 1.2a-d Consented Site Layout Plan(s)	2022 AIR	No change from 2022 AIR figures. These provide the full Consented Development layout and larger scale sections of the Consented layout.
Figure 1.3 and 1.3a-d Proposed Varied Development Layout Plan(s)	New information	Presents the Proposed Varied Development layout and larger scale sections. This remains the same layout as the Scoping Report.
Figure 1.4 Varied Development vs Consented Development Layout	New information	Overlays the Consented vs Proposed Varied Development layouts for comparison.

1.6. Approach to Impact Assessment

Legal Requirements and Scottish Government Guidance

1.6.1. The 2025 Scoping Report confirmed the intention to prepare an EIAR to accompany the S36C application to vary the Consented Development. As the original wind farm was deemed an EIA development under paragraph 2 of Schedule 2 to the 2017 EIA Regulations, any proposed variation must be subject to further environmental assessment. This EIAR has been prepared in line with Regulation 4(2) and (3) of the 2017 EIA Regulations, which require the identification, description, and evaluation of the likely significant effects of the Proposed Varied Development on the environmental factors listed in Regulation 4(3). This EIAR includes the information specified in Schedule 4 of the 2017 EIA Regulations, having regard to the obligations specified in Regulation 4(2) and Regulation 28(1A).

1.6.2. Specifically, Regulation 28(1A) clarifies how the EIA process applies to variation applications and stipulates that variation applications remain subject to the EIA process, with modifications outlined in Regulation 28(2) where applicable. For variation applications to EIA developments, the Regulations require that the environmental effects of the proposed changes be specifically assessed. This includes identifying and evaluating any new or altered significant effects arising from the variation, rather than reassessing the entire consented development. Accordingly, this EIAR presents an assessment of the likely significant direct and indirect effects of the Proposed Varied Development on the environment; and compares the principal differences in environmental impact from those reported within either the Consented Scheme 2021

EIAR or 2022 AIR (as applicable). This accords with the requirements of Regulation 28(2)(c) which states:

> *(c) Schedule 4 is to be read as requiring the inclusion in an EIA report of—*
>
> *i) the main respects in which the developer considers that the likely significant effects on the environment of the proposed varied development would differ from those described in any EIA report or environmental statement, as the case may be, that was prepared in connection with the relevant section 36 consent.*

1.6.3. Scottish Government guidance on S36C applications reinforces this approach, advising that the EIAR should concentrate on the likely significant effects of the development as it would exist if the variation were approved. Accordingly, this EIAR provides a targeted assessment of the environmental implications of the proposed changes, ensuring compliance with both regulatory and policy expectations.

Methodology

1.6.4. The EIAR provides impact assessment chapters for the relevant factors specified in Regulation 4(3) of the 2017 EIA Regulations where they are likely to be significantly affected, taking account of the description of the Proposed Varied Development, the mitigation by design, other mitigation measures and the assessment scope agreed with relevant consultees. Each assessment chapter describes the assessment methodology, the criteria by which a significant effect is defined and a comparison against the findings of the 2021 EIAR for the Consented Development. A summary of this process is as follows:

i. Prepare a summary of the likely significant effects of the Consented Scheme against the baseline conditions at the site. This EIAR has been prepared with reference to baseline information collected and presented as part of the previous environmental impact assessment reports prepared for the site (2021 EIAR and 2022 AIR), subject to updates where this was deemed to be necessary and proportionate as an outcome of the sensitivity analysis.

ii. Undertake a sensitivity analysis of the relevant environmental assessments that were prepared for the Consented Scheme to determine if the results remained appropriate, or if an updated assessment would be required. By way of example, for the purposes of carrying out a like for like comparison, an updated assessment might be required where the changes to the baseline, methodology or cumulative context could result in a change to the likely significant effects of the Consented Scheme.

iii. Provide an assessment of the effects of the Proposed Varied Development. This is carried out in the context of the same baseline or updated baseline, where appropriate, for the purposes of carrying out a like for like comparison.

iv. Provide a description of the main aspects in which the effects of the Proposed Varied Development differ from those identified for the Consented Scheme.

1.6.5. In taking this approach, the EIAR provides an assessment of the Proposed Varied Development as a whole and describes any additional effects associated with the Proposed Varied Development when compared to the assessment conducted for the Consented Development.

1.6.6. Without implementation of the Consented Scheme to construction, and in the absence of any interventions in respect of the previously reported baseline environment of the site, the baseline environmental conditions are expected to remain largely unchanged over time. The existing land use, condition and management would be expected to continue largely unaltered. Other committed development in the surrounding area would alter the baseline context of the site in the future. Operational, under construction and consented (not yet constructed) wind farms have been considered as part of the baseline (see also 'Cumulative Effects' section below). As such, no future baselines are factored into this assessment.

Cumulative Effects

1.6.7. 2017 EIA Regulations require that, in assessing the effects of a particular development proposal, consideration is also given to the cumulative effects which might arise from the proposed variation in conjunction with other development proposals in the vicinity. The cumulative assessments in the technical chapters of the EIAR consider, where appropriate, the cumulative effects arising from the addition of the Proposed Varied Development to cumulative developments which are the subject of a valid planning application where there is sufficient information to enable them to do so. Operational, under construction and consented (not yet constructed) wind farms have been considered as part of the baseline review.

1.6.8. **Figure 5.9** shows the locations of wind farms that may be included in cumulative assessment for the Proposed Varied Development. Each technical chapter identifies an appropriate cumulative study area independently, as some impacts may be judged as requiring assessment over a larger radius than others. Please note, developments at Scoping stage are not typically included as cumulative developments.

1.7. Statement of Competence & Project Team

1.7.1. The EIA process has been managed by the Applicant with assessments undertaken by competent third-party experts. In accordance with Regulation 5(5) of the 2017 EIA Regulations, the Applicant has ensured that the assessments undertaken and reported within this EIAR have been prepared by professional EIA practitioners with relevant experience and holding relevant degree level qualification and membership of appropriate professional bodies.

1.7.2. Each impact assessment chapter that has been produced by consultants external to the Applicant notes their participation at the contents page. A summary of the technical team's expertise and qualifications, including relevant experience and professional memberships, is presented in **Technical Appendix 1.1: EIAR Team**. The specialist consultants appointed by the Applicant are as follows:

- Socio-economic Report - BiGGAR Economics;
- Landscape and Visual – ASH design + assessment Ltd (ASH);
- Ecology and Ornithology – RPS Consulting Services Ltd (RPS);
- Hydrology & Hydrogeology, Geology & Carbon Balance – SLR Consulting Ltd;
- Archaeology and Cultural Heritage – CFA Archaeology Ltd (CFA); and
- Aviation and Radar – Pager Power.

1.8. Structure of the EIAR

1.8.1. **Volume 1:** Non-Technical Summary (NTS).

1.8.2. **Volume 2:** EIA Report (this document), structured as follows:

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

1.8.3. **Volume 3**: Non-landscape and visual figures.

1.8.4. **Volume 3a and 3b**: Landscape and visual and cultural heritage figures and visualisations, split into NatureScot format and Highland Council format, respectively.

1.8.5. **Volume 4:** Technical Appendices.

1.8.6. **Volume 5:** Confidential Appendices (these are particular appendices that, by legal requirement, may only be viewed by appropriate consultees).

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

1.8.8. A glossary of terms is also included at the front of this EIAR (**Volume 2: Glossary and Abbreviations**).

1.9. The Applicant

1.9.1. The Applicant is part of SSE Renewables, a leading developer, owner and operator of onshore and offshore wind farms in the UK and Ireland, with a vision to make renewable energy the foundation of a zero-carbon world. Part of the FTSE-listed SSE plc, the Applicant's strategy is to drive the transition to a low-carbon future through the world class development, construction and operation of their fleet of onshore and offshore wind energy generation sites, and flexible hydro.

1.9.2. SSE Renewables operates one of the largest onshore wind energy fleets in the UK and Ireland, with almost 5GW of installed green energy capacity and another 2GW in construction. Their vision is to be a leading renewables company in a net-zero world with the aim of increasing their renewable energy output by ~40% over the next 2 years. SSE Renewables continues to progress development options for new onshore wind farms and extensions to existing wind farms and is well placed to take advantage of any future opportunities as they emerge.

1.9.3. SSE Renewables is committed to supporting local supply chains. Their Sustainable Procurement Code emphasises the importance of sustainable supply chains. A key principle of a promoting a sustainable supply chain to sharing economic opportunities with the people and businesses located close to their operations. As well as working with communities directly, the Applicant has a structured approach to engaging with its strategic suppliers with an expectation upon them to form constructive local relationships so that communities gain from the Applicant's significant capital investments. The Applicant recognises that it must be an active contributor to the local communities and has an on-going commitment to share value where it is being created.

1.9.4. SSE Renewables' Community Investment Funds support a diverse range of community projects near their renewable developments. As part of the Sustainable Development

Fund Highland, £800,000 was granted to deliver the Highland Energy Efficiency Programme in 2024/5 and 2025/26. In 2024/25 the Applicant invested over £12.9m supporting over 800 projects in communities across the UK and Ireland, this brings the Applicant's total investment in communities over the past six years to around £100m.

1.9.5. The Applicant develops great sites, undertakes excellent construction, has strong relationships with suppliers and has extremely high standards of operation.