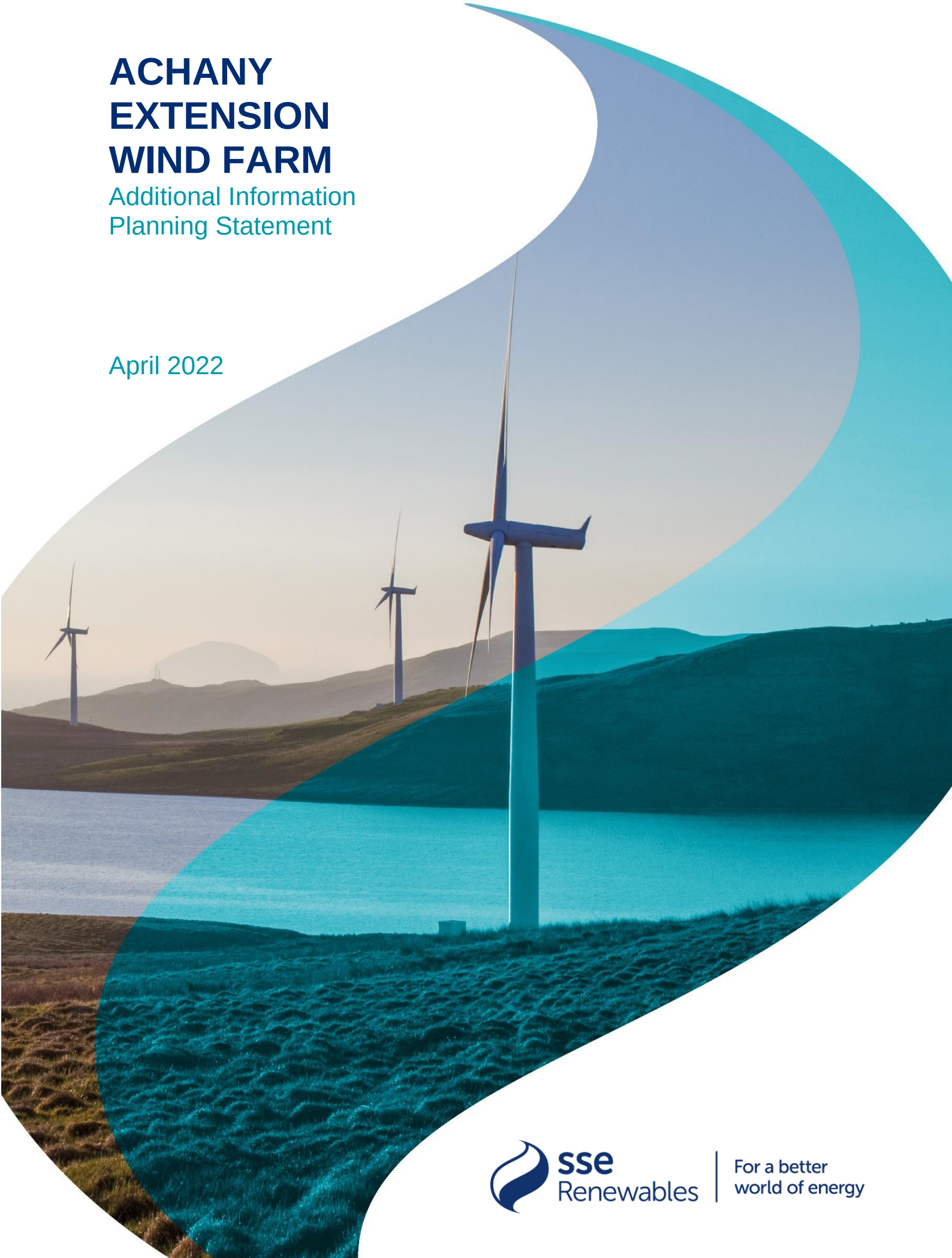
ACHANY EXTENSION WIND FARM

Additional Information Planning Statement

April 2022



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Planning Statement Contents

Appendices

Glossary and Abbreviations

Abbreviation	Description
Section 36 application	Application made under Section 36 of the Electricity Act 1989
20 turbine layout	The Section 36 application submitted to Energy Consent Unit (July 2021)
18 turbine revised layout	The revised proposal reducing the development by two turbines and associated infrastructure to take account of the consultation response from The Highland Council.
Planning Statement	Separate standalone Planning Statement to be submitted in support of the application, providing an assessment of the proposal
EIA	Environmental Impact Assessment
EIAR	Environmental Impact Assessment Report
EIARAI	Environmental Impact Assessment – Additional Information
MW	Megawatt
GW	Gigawatt
Electricity Act	Electricity Act 1989
1997 Act	The Town and Country Planning (Scotland) Act 1997 (as amended)
CO_2	Carbon Dioxide
GDP	Gross Domestic Product
UK	United Kingdom
UN	United Nations
WTG	Wind Turbine Generators
EU	European Union
NPF3	National Planning Framework 3, Scottish Government, June 2014
Draft NPF4	Emerging National Planning Framework 4, Scottish Government, November 2021
SPP	Scottish Planning Policy, Scottish Government, December 2020
LDP	Local Development Plan
HWLDP	Highland-wide Local Development Plan, the Highland Council, April 2012
CasPlan	Caithness and Sutherland Local Development Plan, the Highland Council, adopted 2018.
THC	The Highland Council
SEPA	Scottish Environmental Protection Agency

1. Introduction

1.1 Background

1.1.1 SSE Generation Limited (the "Applicant") submitted an application (the "Application") to the Scottish Ministers under Section 36 of the Electricity Act 1989 ("Electricity Act") and for deemed planning permission under Section 57 (2) of the Town and Country Planning (Scotland) Act 1997 (as amended) on 21 July 2021 (ECU application reference ECU00001930).

1.1.2 The Application related to proposals to construct and operate an extension to the operational Achany Wind Farm ("the Proposed Development"), approximately 4.5 kilometres ("km") north of the village of Rosehall and 11km west-north-west of Lairg ("the Site"), to maximise the renewable electricity generation potential at the Site. The Application sought consent for 20 Wind Turbine Generators ("WTGs") with a maximum tip height of up to 149.9 meters ("m") and associated ancillary development.

1.1.3 As part of the application process a consultation response has been provided from The Highland Council, which raised no objection subject to the removal of two turbines. This has resulted in changes being made to the layout of the Proposed Development which involve the removal of Turbine 10, Turbine 20 and associated infrastructure.

1.1.4 For clarity within this report, the 20 turbine layout is that which was presented in the Section 36 EIA Report in July 2021, (EIAR) and the revised 18 turbine layout which considered the required removal of two turbines (Turbine 10 and Turbine 20) and associated infrastructure from the application, (EIARAI).

1.2 Purpose of the Report

1.2.1 This statement sets out the details of the proposed changes within Section 1.5: with assessment and analysis of the proposed changes provided within Section 3: Assessment of the 18 turbine revised layout against the Planning Framework and Section 4 Summary and Conclusions. The assessment finds that the 18 turbine revised layout continues to accord with the increasing imperative for renewable energy development to address climate change and net zero targets, whilst providing an important contribution to Scotland's energy mix. It secures important jobs and economic benefits to rural Scotland and in particular to a fragile area. Critically, the Proposed Development recognises the need to balance the protection of the environment with the development of sustainable mixed communities. It also confirms that an updated Peat Slide Risk Assessment has been undertaken which does not negatively impact on the overall assessment of peat stability on site, but gives a more detailed analysis of peat stability. This has been prepared to respond to comments made by Ironside Farrar in the Peat Landslide Hazard Risk Assessment Stage 1 Checking Report (February 2022).

1.2.2 The level of predicted significant effects has not changed from that of the 20 turbine layout and is considered to be limited for a development of this scale and is predominantly confined to effects in a localised area and, with the proposed mitigation, is not considered to conflict with the Development Plan read as a whole. It draws considerable additional support from other material planning considerations which are assessed as having greater weight including NPF3, SPP and other Energy and Climate Change Legislation and Policy.

1.2.3 This statement does not form part of the EIAR or subsequent EIARAI. It is a separate document but draws upon the findings presented in the EIAR and EIARAI for the purposes

of appraising the 18 turbine revised layout against the Electricity Act, relevant planning policy and other material considerations.

1.2.4 The information presented in this statement supplements the information already provided in the 20 turbine layout Planning Statement which should be referred to[1]. To ensure that this statement focuses solely upon the key issues and assessment of the proposed changes of the 18 turbine revised layout against the Energy and Planning framework, this statement will focus on changes identified by the EIARAI found to be significant. It is important to note that the information contained within the EIARAI will give a more detailed focus to, and an explanation of, the issues discussed within this statement.

1.2.5 As required by the EIA Regulations, this statement has been prepared by a competent expert Lisa Russell BSc (Hons) MRTPI. Lisa is an Associate Director at Turley with over 18 years' planning experience in the assessment and management of development, including onshore wind, energy and major infrastructure projects across Scotland.

1.3 Approach to Planning

1.3.1 This statement follows the same approach as the 20 turbine layout Planning Statement unless otherwise stated. In particular, to have regard to the following, as per Paragraph 3(1) of Schedule 9 to the Electricity Act 1989:

"the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeology interest; and

whether the developer has complied with its duty to do what it reasonably can to mitigate any effect, which the proposals would have on the natural beauty of the countryside or any such flora, fauna, features, sites, buildings or objects".

1.3.2 This statement seeks to demonstrate that the key considerations to be addressed by Scottish Ministers, as outlined in paragraph 1.3.1, have been met through the revised design of the 18 turbine revised layout as demonstrated by the EIAR and EIARAI. It should be noted that unlike planning applications determined under Section 25 of the Town and Country Planning (Scotland) Act 1997 (as amended), the Proposed Development does not need to be assessed primarily against the Development Plan. Notwithstanding, the Development Plan provides local planning policy and guidance and is therefore considered to be a relevant material planning consideration, addressed as such within this statement.

1.3.3 Scottish Ministers will also take into account a range of additional material considerations and this statement identifies these, where they relate to the proposed changes from the 20 turbine layout to the 18 turbine revised layout.

Planning History

1.3.4 The Planning History is as per the 20 turbine layout Planning Statement which should be referred to.

[1] SSE July 2021, Achany Extension Wind Farm Planning Statement

1.4 Iterative Design Process

1.4.1 Details of the design iteration process which informed the 20 turbine layout is contained within Chapter 2 of the EIAR: Site Selection and Design Evolution of the EIAR and within the accompanying Design Statement (EIAR Technical Appendix 2.1). The EIARAI provides an update to the design iteration process removing two turbines and associated infrastructure in acceptance of The Highland Council consultation response.

1.5 The 18 WTG Proposed Development

1.5.1 The Revised 18 turbine revised layout is contained within the same application boundary (as the 20 turbine layout) and comprises up to 18 WTGs and would be an extension to the 19 WTGs of the operational Achany Wind Farm. The installed generation capacity of the existing operational Achany Wind Farm is 38 megawatts ('MW') and the total installed capacity of the Proposed Development alone, is anticipated to be estimated at 76MW. Therefore, the combined capacity of Revised 18 turbine revised layout with the existing Achany Wind Farm is anticipated to be estimated at approximately 113MW.

1.5.2 The description of development is as per the 20 turbine layout Planning Statement, with the exception of the changes noted in Table 2.1 of the EIARAI, replicated below.

EIARAI Table 2.1: Summary of Key Changes between the 20 Turbine Layout and the 18 Turbine Revised Layout

Infrastructure Element	20 Turbine Layout (EIA Report, July 2021)	18 Turbine Revised Layout (February 2022)	Summary of Changes
No. of Turbines	20	18	Removal of two turbines
Tip Height	Up to 149.9 m	Up to 149.9 m	No change
Rotor Diameter	Indicative diameter of 136 m	Indicative diameter of 136 m	No change
Hub Height	Indicative hub height of 86 m	Indicative hub height of 86 m	No change
Access Track Length	Approx. 17.3 km	Approx. 16.6 km	A reduction in track length of approx. 0.7km associated with the removal of T10 and T20.
Turbine Foundations and **Hardstandings**	Temporary Land Use (m2) 12086.49 Permanent Land Use (m2) 36023.89	Temporary Land Use (m2) 10877.84 Permanent Land Use (m2) 32421.5	Reduction in Temporary Land Use (m2) 1208.65 Reduction in Permanent Land Use (m2) 3602.39
Borrow Pits	Comprising both new and the reworking of a borrow pit used previously for Achany Wind Farm.	Comprising both new and the reworking of a borrow pit used previously for Achany Wind Farm.	No change
Substation and Operations Building	Requirement for a new on-site substation and operations building.	Requirement for a new on-site substation and operations building.	No change

Infrastructure Element	20 Turbine Layout (EIA Report, July 2021)	18 Turbine Revised Layout (February 2022)	Summary of Changes
Temporary Construction Compounds, including concrete batching plant area	Requirement for temporary construction compounds, laydown areas and concrete batching plant.	Requirement for temporary construction compounds, laydown areas and concrete batching plant.	No change
Permanent Met Masts/LiDAR	A single permanent Light Detection and Ranging (LiDAR) station would be required.	A single permanent Light Detection and Ranging (LiDAR) station would be required	No change

1.5.3 The locations of the turbines are the same as that presented in the 20 turbine layout, with the exception of Turbines 10 and 20 which are removed. As per the 20 turbine layout, the location of the key components have been informed by detailed survey work, EIA and micro-sited to the Revised Layout option. Notwithstanding this, there may be a requirement at the point of construction, when further micro-siting is required. It is proposed that the development would be subject to a micro-siting allowance relating to turbines, access tracks, underground cables and crane hardstanding of 50m which has been assessed by the EIA. The requirement for micro-siting could be conditioned to ensure that appropriate information to justify any micro-siting requirements and consultation is undertaken with appropriate statutory bodies (notably including SEPA to confirm the micro-siting meets the requirements set out within their consultation response relating to Turbines 8 and 19, dated 3rd September 2021) and THC, as required.

2. Overview of Legislation, Policy and Guidance

2.1 Statutory Provisions

2.1.1 The Statutory Provisions set out within the 20 turbine layout Planning Statement should be referred to. These have not changed in respect of the following statutory provisions:

- Electricity Act 1989
- The Town and Country Planning (Scotland) Act 1997 (as amended)
- Electricity Works Regulations

2.1.2 International, UK-Wide and National Energy, Climate Change, Energy and Planning Legislation, Policy and Guidance are set out with the 20 turbine layout Planning Statement and should be referred to. The following documents have not changed:

- The United Nations Adoption of the Paris Agreement COP21 (December 2015)[2]
- The UK Climate Change Act 2008[3] (and amendment 2019[4])
- The HM Government Energy White Paper Powering our Net Zero Future (December 2020)[5]
- HM Government Build Back Better Policy Paper (March 2021)[6]
- The Scottish Electricity Generation Policy Statement (2013)[7]
- Letter of 11 November 2015 from John McNairney to all Heads of Planning in relation to energy targets and SPP[8]
- The Scottish Government: Scottish Energy Strategy (December 2017)[9]
- The Scottish Government: Onshore Wind Policy Statement (December 2017)[10]
- The Scottish Government: Climate Change Plan (February 2018)[11]
- The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019[12]
- Scotland's Climate Change Plan (2020)[13]

[2] United Nations (2015) Paris Agreement. Available at: https://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf (last accessed19 April 2021)
[3] HM Government, The Stationary Office Limited (2008): The UK Climate Change Act 2008 available online at: https://www.legislation.gov.uk/ukpga/2008/27/pdfs/ukpga_20080027_en.pdf (last accessed 19 April 2021).
[4] HM Government, The Stationary Office Limited (2019): The UK Climate Change Act 2008 (2050 Target Amendment) Order 2019 available online at: https://www.legislation.gov.uk/ukdsi/2019/9780111187654 (last accessed 19 April 2021).
[5] HM Government (2020) Energy White Paper: Powering our Net Zero Future. Available online at: https://www.gov.uk/government/publications/energy-white-paper-powering-our-net-zero-future (last accessed 19 April 2021)
[6] HM Government (2021) Build Back Better. Available online at: https://www.gov.uk/government/publications/build-back-better-our-plan-for-growth (last accessed 19 April 2021)
[7] Scottish Government (2013): The Scottish Electricity Generation Policy Statement. Available online at: https://www.gov.scot/publications/electricity-generation-policy-statement-2013/ (last accessed 19 April 2021)
[8] Scottish Government Chief Planner (11 November 2015): Letter from Chief Planner to Heads of Planning in relation to energy targets and Scottish Planning Policy. Available online at: https://www.gov.scot/publications/energy-targets-and-scottish-planning-policy-chief-planner-letter/ (last accessed 19 April 2021)
[9] Scottish Government (2017) The Future of energy in Scotland: Scottish Energy Strategy. Available online at: https://www.gov.scot/publications/scottish-energy-strategy-future-energy-scotland-9781788515276/ (last accessed 19 April 2021)
[10] Scottish Government (2017) Onshore Wind: Policy Statement. Available online at: https://www.gov.scot/publications/onshore-wind-policy-statement-9781788515283/ (last accessed 19 April 2021)
[11] Scottish Government (2018): Climate Change Plan: Third Report on proposals and policies.
[12] Scottish Parliament (2019): The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. Available online at: https://www.legislation.gov.uk/asp/2019/15/enacted (last accessed 19 April 2021)
[13] Scottish Government (2020): Update to the Climate Change Plan: third report on proposals and policies 2018 – 2032 (RPP£). Available at: https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018/ (last accessed 19 April 2021)

- Scotland's Energy Strategy Position Statement March 2021
- National Planning Framework 3[14]
- Scottish Planning Policy[15]
- The Scottish Government (online): Onshore wind turbines guidance (updated May 2014)
- The Scottish Government: Onshore Wind – some questions answered (December 2016)
- SNH: Spatial planning for onshore wind turbines – natural heritage considerations: guidance (June 2015)
- The Scottish Government: Good practice principles for shared ownership of renewable energy developments (September 2015)
- Highland-wide Local Development Plan 2012
- Caithness and Sutherland Local Development Plan 2018
- The Onshore Wind Energy Supplementary Guidance (adopted November 2016) including the Addendum Supplementary Guidance (adopted December 2017)

2.2 Publications since the submission of the Application

2.2.1 The following documents have been published since the 20 turbine layout Planning Statement was prepared and are relevant to the assessment of the 18 turbine revised layout.

COP26 – Glasgow Climate Pact

2.2.2 The Glasgow Climate Pact[16] sets out the key outcomes and agreements reached at COP26, November 2021. It seeks to deliver on the Paris Agreement through agreement of nearly 200 parties to promote an international regime for global efforts against climate change. Key actions were focused on adaptation, finance and mitigation to secure a limit of 1.5 degrees average temperature rise with member parties agreeing to collectively work to strengthen emissions reductions and align national climate action pledges with the Paris Agreement. Alok Sharma (UK president of COP26) stated that:

"we can now say with credibility that we have kept 1.5 degrees alive. But its pulse is weak and it will only survive if we keep our promises and translate commitments into rapid action".

Net Zero Strategy – Build Back Greener[17]

2.2.3 The UK Government's Net Zero Strategy is the strategy for the transition to a low carbon economy prepared in advance of COP26. It makes a commitment to ensure that all electricity comes from low carbon sources by 2035, subject to security of supply. It

[14] Scottish Government (2014) National Planning Framework 3. Available online at: https://www.gov.scot/publications/national-planning-framework-3/ (last accessed 19 April 2021)
[15] Scottish Government (2020) Scottish Planning Policy. Available online at: https://www.gov.scot/publications/scottish-planning-policy/ (last accessed 19 April 2021)
[16] United Nations (2021) The Glasgow Climate Pact – Key Outcomes from COP26 https://unfccc.int/process-and-meetings/the-paris-agreement/the-glasgow-climate-pact-key-outcomes-from-cop26
[17] HM Government Net Zero Strategy – Build Back Greener (2021) Available online at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf (last accessed 15 February 2022)

confirms that this will be achieved through the accelerated deployment of low-cost renewable generation, advising that a low-cost electricity system which meets net zero will predominantly comprise wind and solar generation where the role of the planning system must be to assist such development.

2.3 Consultation Documents

2.3.1 The following documents are currently at the consultation stage and therefore whilst carrying less weight than final published documents, are material considerations, particularly where they confirm the current policy position and ambitions of the Scottish Government to set out an approach to reach legally binding climate change and net zero targets and where this accords with other National energy policy and targets.

Onshore Wind Policy Statement Refresh 2021: Consultative Draft[18]

2.3.2 The Scottish Government issued the Onshore Wind Policy Statement for consultation on 28 October 2021. The consultation seeks views on the Scottish Government's ambitions to secure a further 8 – 12 GW of installed onshore wind capacity by 2030. It outlines potential measures to tackle barriers to deployment, and to secure maximum economic benefits from developments. It confirms the essential role of onshore wind to meet the legally binding climate change and net zero targets. It advises that Scotland reached 95.9% of gross Scottish electricity consumption from renewable sources by 2020, and sets out new ambitions in paragraphs 1.2.2 and 1.2.3 stating:

"We must now go further and faster than before. We expect the next decade to see a substantial increase in demand for electricity to support net zero delivery across all sectors, including heat, transport and industrial processes…This will undoubtedly require a substantial increase in installed capacity across all renewable technologies.

There is currently 8.4GW of installed onshore capacity in Scotland providing 19.5GWh of our total electricity generation in 2020. Scotland hosts the majority of operational onshore wind capacity in the UK, and our aim is to maintain the supportive policy and regulatory framework which will enable us to increase that deployment still further."

2.3.3 With regard to Land Use as an Environmental Barrier to Deployment, paragraph 4.2.1 recognises the role of the extensions to existing wind farms and the planning balance between developers and communities and states that:

"Scotland has a long and positive history of harnessing renewable energy and our capacity to generate it will need to be increased to meet our net zero targets. Our energy will continue to be provided by a wide and diverse range of renewable technologies, including onshore wind. We will need to continue to develop wind farms, in the right places, and also look to the extension and replacement of existing sites. As set out in our Onshore Wind Policy Statement, in order to achieve this developers and communities will need to work together to ensure that projects strike the right balance between environmental impacts, local support, benefit, and – where possible – economic benefits for communities, for example through community ownership or other means".

2.3.4 It confirms (in paragraph 4.2.1) that as Scotland moves towards a net zero economy, change of use of land to forestry and peatland restoration must happen alongside other

[18] Scottish Government (2021) Onshore Wind – Policy Statement Refresh 2021: Consultative Draft. Available online at: https://www.gov.scot/publications/onshore-wind-policy-statement-refresh-2021-consultative-draft/ (last accessed 15 February 2022)

identified essential activities which are stated to be *"food production"* and *"onshore wind generation"* as well as the protection and enhancement of habitats and biodiversity.

2.3.5 Paragraph 4.2.9 confirms the considerable benefits that onshore wind brings to rural areas:

"..ranging from delivery of jobs and investment, restoration and protection of natural habitats."

2.3.6 Section 4.4 Landscape and Visual Impact of the document confirms that the landscape and visual impact of wind farms is an evolving area which seeks to protect Scotland's most cherished landscapes, requiring early discussion with planning authorities on appropriate sites, however noting that:

"Our net zero ambitions require decisive action, will change how Scotland looks and that we will need to deploy significant volumes of onshore wind generation over the next decade to help us meet our challenging legal obligations. This is likely to comprise modern, efficient turbines which will maximise the generation possible at each site and a mix of current technologies and taller turbines."

Scotland 2045 - Fourth National Planning Framework – Draft Consultation

2.3.7 Since the submission of the Application, The Scottish Government published Scotland 2045 – Fourth National Planning Framework Draft Consultation ("Draft NPF4") [19] on 10th November 2021. It is not currently a policy document as at this early consultation stage, the content is subject to potential change. Once published as a final document it will become part of the Development Plan. The current consultation document is however a material consideration. It confirms the necessary shift required to achieve net zero-emissions by 2045 and emphasises the requirement to make significant progress toward this target by 2030, to be achieved through new developments and infrastructure across Scotland.

2.3.8 It advises that there are a number of considerations which must be addressed in successful renewable energy development including, but not limited to, contribution to: renewable energy targets; effects on landscape; communities; carbon rich soils; water; natural heritage; and the historic environment.

2.3.9 Draft NPF4, Part 2, National Development 12 relates to strategic renewable energy generation and transmission infrastructure, supporting renewable energy generation, repowering and associated grid improvements.

2.3.10 It confirms that a large increase in renewable energy generation is essential to Scotland meeting net zero emission targets and that all forms of electricity generation exceeding 50MW capacity will be defined as national development. The need for such development is confirmed as:

"additional electricity generation from renewable and electricity transmission capacity of the scale fundamental to achieving a net zero economy"

2.3.11 Draft NPF4 also sets out national planning policies for achieving a net zero, natural positive Scotland. It confirms that the planning system must be:

[19] Scottish Government (2020) Scotland 2045 - Forth National Planning Framework: Draft Consultation. Available online at: https://www.gov.scot/publications/scotland-2045-fourth-national-planning-framework-draft/ (last accessed 15 February 2022)

"re-balanced to ensure that climate change and nature recovery are the primary guiding principles for all plans and decisions".

2.3.12 Proposed Policy 2 Climate Emergency also confirms that:

"a) when considering all development proposals significant weight should be given to the Global Climate Emergency.

b) all development should be designed to minimise emissions over its lifecycle in line with the decarbonisation pathways set out nationally.

c)…the scale of the contribution of proposals to emissions in relation to emissions reduction targets should be taken into account."

2.3.13 Proposed Policy 19 Green Energy advises that local development plans should seek to ensure that an area's full potential for electricity and heat from renewable sources is achieved and opportunities for new development, extensions and repowering of existing renewable energy development should be supported.

2.3.14 It proposes supporting all forms of renewable energy, in principle.

2.3.15 It advises that wind farms in National Parks and National Scenic Areas should not be supported but outwith these areas, wind farms including proposals to repower, extend or expand existing wind farms should be supported unless the impacts (including cumulative) are unacceptable which should be informed by EIA and Landscape and Visual Impact Assessments.

2.3.16 It sets out matters to be covered by applications, which are essentially those set out within SPP paragraph 169.

2.3.17 Policy 32 confirms that proposals for development in wild land should only be supported where:

"the proposed development cannot be reasonably located outside of the wild land area; or, it is for small scale development directly linked to a rural business, croft or required to support a fragile population in a rural area; and, a site based assessment of any significant effects on the qualities of the areas is undertaken, and use of siting, design or other mitigation minimises adverse impacts."

3. Assessment of the Proposed Development against the Planning Framework

3.1 Electricity Act Requirements

3.1.1 The Proposed Development is supported by an EIARAI meeting the Electricity Act requirements to provide evidence that the Applicant has undertaken their duty to do all that they reasonably can to mitigate the effects of the 18 turbine revised layout.

3.1.2 This includes the latest design iteration to remove two turbines in response to The Highland Council consultation response and which builds upon the design iterations identified in the 20 turbine layout and associated EIA and Planning Statement.

3.1.3 The EIARAI Chapter 14 Schedule of Mitigation confirms that the design changes do not impact on the proposed non-embedded mitigation identified by the EIAR and committed to by the applicant to comply with the requirements of the Electricity Act.

Predicted significant effects of the 20 turbine layout

3.1.4 The EIAR of the 20 turbine layout found a limited number of localised significant effects relating to landscape and visual receptors, albeit no significant landscape effects on National Scenic Areas, Special Landscape Areas or other designated sites. Chapter 12 Cultural Heritage also identified a moderate significant effect on Dail Langwell Scheduled Monument. However, the Chapter concluded that as the asset retains the near and key views from the broch over the river crossing, the agricultural land to the east, and the open views to the north and south, up and down the glen would still be understandable and remain appreciable. Therefore, the key relationships with the River Cassley and glen remaining appreciable and the ability to understand its defensive position is not diminished by the 20 turbine layout, therefore there would not be an adverse effect upon the integrity of the asset's setting.

3.1.5 Whilst other effects were identified by the EIA, with appropriate mitigation, the residual effects were not considered to be significant.

Predicted significant effects of the 18 turbine revised layout

3.1.6 The assessment of the 18 turbine revised layout against the 20 turbine layout, as contained in EIARAI Chapter 3 Landscape and Visual, confirms that with regard to visual effects whilst there are some perceptible changes to the appearance of the wind farm from some viewpoints, settlement and route based visual receptors. However, this does not lead to a change in the presence of significant effects than those predicted for the 20 turbine layout. Visual effects would remain as detailed in paragraph 3.1.4. Accordingly, there is no change to the predicted cumulative visual effects.

3.1.7 Similarly, the landscape assessment review concluded that there was not considered to be any changed to landscape effects either individually or cumulatively from the 18 turbine revised layout compared to the 20 turbine layout WTG Proposed Development assessed within the EIAR.

3.1.8 With regard to the revised Cultural Heritage assessment undertaken for the 18 turbine revised layout (as contained in Chapter 8 of the EIARAI), there would be a reduction in the number of turbines visible from assets where a significant effect was predicted (under operational and cumulative effects in Chapter 12 of the EIA Report for 20 turbine layout). However, that reduction does not materially change the magnitude of impact and levels

of effect and therefore the moderate and significant operational effect upon the setting of Dail Langwell, broch (Asset 45) would remain as detailed in paragraph 3.1.4.

3.1.9 The remainder of the EIARAI confirms that the assessment of the changes demonstrated that there continues to be no other significant environmental effects predicted from the 18 turbine revised layout.

3.2 Contribution to meeting EU, UK and Scottish Government Energy and Climate Change Targets

3.2.1 The removal of two turbines from the 20 turbine layout amends the contribution the 18 turbine revised layout makes towards the Scottish Governments renewable energy targets. As an extension to the existing Achany Wind Farm, the 18 turbine revised layout would:

- Adjust the installed capacity from 80MW to an estimated 76MW;
- Make the best us of available resources, through utilisation of land, access and infrastructure, where possible;
- Secure a reduction in carbon dioxide through provision of electricity from a renewable resource to replace fossil fuel generation (The Carbon Calculator document reference number is: UIRC-LUK8-7CN3);
- Provide an important contribution towards meeting the ambitious EU, UK and Scottish Government targets for renewable energy;
- Provide an important contribution to providing energy from renewable sources to help address the declared Climate Emergency by the Scottish Government and at the local level by The Highland Council; and
- Help provide a secure energy supply for Scotland.

3.3 National Planning Policy and Guidance Assessment

NPF3

3.3.1 As the assessment of the 18 turbine revised layout(EIARAI) confirms there are no changes to the significance of effects predicted, the proposed assessment against NPF3 remains as assessed in the Planning Statement for the 20 turbine layout and should be referred to. It confirmed the development complies with and gains support from NPF3.

Emerging NPF4

3.3.2 Whilst the Draft NPF4 has not been adopted, the current consultation document is a material planning consideration, albeit the weight to be attached to its contents remains the decision of Scottish Ministers.

3.3.3 The 18 turbine revised layout gains significant support from the Draft NPF4 as an extension to an existing wind farm and as a development in excess of 50 MW which would result in it being classified as a National Development. It also complies with the proposed national policies, through the provision of an EIA including LVIA, which demonstrates that it does not have unacceptable effects on the landscape or wild land areas. In these circumstances NPF4 advises wind farms should be supported.

3.3.4 Draft NPF4 also seeks to redress the balance in favour to ensure that climate change as a guiding principle for all decisions and the need to focus on actively encouraging all developments which help reduce emissions, clearly demonstrate the will of the Scottish Government to address climate change. Furthermore, it confirms that the Global Climate

Emergency will be given significant weight in the determination of applications. The 18 turbine revised layout will provide an estimated 76MW of renewable energy generation, contributing towards Scotland's demanding climate change targets.

Scottish Planning Policy

3.3.5 As the assessment of the 18 turbine revised layout (EIARAI) confirms there are no changes to the significance of effects predicted, the proposed assessment against SPP remains as assessed in the Planning Statement for the 20 turbine layout and should be referred to. It confirmed the development complies with and gains significant support from SPP, which is a material consideration.

3.4 Development Plan Assessment

3.4.1 As an application made under the Electricity Act, the Development Plan is not the primary document. However, it is a material consideration in the determination of the application. In the exercise of their judgement, it is for Scottish Ministers to consider the weight which should be attached to the Development Plan in their assessment. Due to the age of the Development Plan, it does not reflect the latest EU, UK and Scottish Government policy and guidance and direction of travel, which seeks to provide greater support for developments which make a contribution to: renewable energy targets; addressing Climate Change; and securing the move to full decarbonisation. It is therefore considered that the need to address the Proposed Development's contribution to these aims should be taken into account in the planning balance and afforded greater weight than the dated Development Plan.

3.4.2 As discussed in Chapter 2, the Development Plan comprises the HwLDP and CaSPlan. The full policies of the HwLDP are contained within EIAR Technical Appendix 6.1.

3.4.3 Table 3.1 below provides a summary of the Policies of the HwLDP and confirms where there are any changes relevant to the assessment of the 18 turbine revised layout against those policies.

Table 3.1: HWLDP Policies and assessment of Compliance of 18 Turbine Revised Layout

Policy Number/Title	Conclusion of Planning Statement assessment of 20 turbine layout	Changes to the assessment through 18 turbine revised layout
Policy 28 Sustainable Development	Compliance: The Proposed Development is considered to be compliant with the requriements of Policy 28.	No change
Policy 29 Design Quality and Place-making	Compliance: The Proposal is considered to be compliant with Policy 29.	A further design iteration has been included – removing two Turbines to take account of The Highland Council consultation response. This has been assessed by the EIARAI and confirms no change to the assessment to that of 20 turbine layout. The proposal is considered to be compliant with policy 29.
Policy 30 Physical Constraints	Compliance: The assessment undertaken by the EIAR, including the design evolution process (described in EIAR Chapter 2 and EIAR Technical Appendix 2.1) and the associated mitigation proposed (as summarised in Chapter 18 Schedule of Mitigation) ensures that there are no signficant effects to the physical constraints identified by Policy 30 in EIAR Technical Appendix 6.2, thereby ensuring compliance with Policy 30.	A further design iteration has been included – removing two Turbines to take account of The Highland Council consultation response. This has been assessed by the EIARAI and confirms no change to the assessment to that of 20 turbine layout. The proposal is considered to be compliant with policy 30.
Policy 31 Developer Contributions	Compliance: The Applicant is willing to enter into discussions with THC/Scottish Ministers to agree conditions or where necessary, obligations or other legal agreements to ensure compliance with Policy 31.	No change
Policy 36 Development in the Wider Countryside	Compliance: This policy does not require compliance as assessment for onshore wind will be made under Policy 67.	No change
Policy 51 Trees and Development	Compliance: The Proposed Development protects trees and woodlands and is compliant with Policy 51.	No change
Policy 52 Principle of Development in Woodland	Compliance: The Proposed Development avoids development in and avoids significant effects to Woodland and is therefore compliant with Policy 52.	No change

Policy Number/Title	Conclusion of Planning Statement assessment of 20 turbine layout	Changes to the assessment through 18 turbine revised layout
Policy 54 Mineral Wastes	Compliance: The proposal is considered to comply with Policy 54.	No change
Policy 55 Peat and Soils	Compliance: The Proposed Development is considered to comply with Policy 55.	No change, however the Peat Slide Risk Assessment has been updated (Volume 4: Appendix A of the EIARAI. This does not negatively impact the overall assessment of peat stability on site, but gives a more detailed analysis of peat stability in response to comments made by Ironside Farrar in the Peat Landslide Hazard Risk Assessment – Stage 1 Checking Report (February 2022).
Policy 56 Travel	Compliance: The Proposed Development is considered to comply with Policy 56.	No change
Policy 57 Natural, Built and Cultural Heritage	Compliance: The Proposed Development is considered to comply with the requirements of Policy 57.	No change
Policy 58 Protected Species	Compliance: The Proposed Development is considered to comply with Policy 58.	No change
Policy 60 Other Important Habitats and Article 10 Features	Compliance: The Proposed Development complies with Policy 60.	No change
Policy 61 Landscape	Criterion 1 Compliance: The Proposed Development is considered to comply with this criterion. Criterion 2 Compliance: It concludes that the threshold for this criterion would not be exceeded as it is not anticipated to dtract from key elements of these routes and gateway points. Criterion 3 Compliance: Overall it concludes that the Proposed Development would not diminish the prominence or distrupt the	No change

Policy Number/Title	Conclusion of Planning Statement assessment of 20 turbine layout	Changes to the assessment through 18 turbine revised layout
	setting to any natural or cultural heritage landmarks ensuring compliance with the criterion. Criterion 4 Compliance: Overall the proposal is considered to comply with the criterion. Criterion 5 Compliance: The Proposed Development is therefore considered to be compliant with this Criterion. Criterion 6 Compliance: Overall, it concludes that the Proposed Development forms a well-located wind farm site with relatively localised significant landscape and visual effects and which respects the pattern of existing development within the Rounded Hills (Caithness and Sutherland LCT) and considered to accord with the criterion. Criterion 7 Compliance: The conclusion is compliance with the criterion. Criterion 8 Compliance: Overall it concludes that the criterion is met because the apparent landscape scale and distance perceived by receptors would be generally maintained, other than in very localised locations where the Proposed Development would inevitably be closer than existing wind turbines. Criterion 9 Compliance: The Proposed Development is considered to comply with this criterion. Criterion 10 Compliance: The Proposed Development is not considered to exceed the threshold for this criterion and is considered to comply with it. Overall Compliance with OWESG: EIAR Technical Appendix 7.11 confirms that the Proposed Development is considered to be in broad conformity with THC's 10 criteria for the consideration of wind farm proposals. Compliance with Policy 61 Landscape: Design iteration secured the most appropraite design to limit landscape and visual effects through embedded design mitigation which has ensured that the Proposed Development has significantly overcome substantial impacts on the landscape and visual receptors. Those limited	

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	effects which have been identified are limited to localised areas up to 10km including two Landscape Character Areas and localised effects on the WLA34, however confirms that the majority of the WLA would not be affected and the Proposed Development maintains the integrity of WLA 34. The majority of landscape effects would not be significant including effects to any NSAs or SLAs. Visual effects which are significant are largely contained within 10km and no greater than 12.5km of the Proposed Development with the majority of visual effects being not significant. Cumualtive landscape effects would remain relatively localised within 10km of the development and no greater than 12.5km and there are no signficant effects to any designated sites including NSA's, SLAs or sites on the inventory of Gardens and Designed Landscapes. Given the scale and nature of the Proposed Development, significant effects are anticipated within the localised environment, however, embedded mitigation by design has limited the effects to residential, recreational and route-based visual receptors in areas to the north-east of Loch Shin, around Rosehall and Glen Cassley and recreational users within a localised part of the upland area to the west of Glen Cassley, and would result in a greater influence of wind turbines on the landscape character within parts of Glen Cassley, the upland plateau areas to either side of it, and a localised part of WLA 34, Reay – Cassley, but critically retaining the overall integrity of WLA34. All other effects are not significant. The Policy requirement is that new developments should be designed to reflect the special qualities identified in the Landscape Character which they are proposed and in this respect, the proposal is considered to comply with this requirement, seeking to take due cognisance of the landscape character and promotes the most suitable development option for the Site. Furthermore, the	

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	detailed assessment contained in EIAR Techncial Appendix 7.11 also confirms broad conformity with the OWESG confirming there is overall compliance with this Policy.	
Policy 62 Geodiversity	Compliance: The proposed development complies with the requirements of Policy 62.	No change
Policy 63 Water Environment	Compliance: The Proposed Development complies with Policy 63.	No change
Policy 64 Flood Risk	Compliance: With implementation of committed mitigation, the Proposed Development complies with Policy 64.	No change
Policy 65 Waste Water Treatment	Compliance: Subject to a suitable condition, the measures to protect the environment and staff/public health can be protected and therefore the Proposed Development will comply with Policy 65.	No change
Policy 66b Surface Water Drainage	Compliance: With implementation of committed mitigation, the Proposed Development complies with Policy 66b.	No change
Policy 67 Renewable Energy Developments	Many of the criteria set out within this policy are addressed through the assessment of other policies and should be referred to, including: Policy 55 Peat and Soils; Policy 56 Travel; Policy 57 Natural, Built and Cultral Heritage; Policy 58 Protected Species; Policy 60 Other Important Habitats and Article 10 Features; Policy 61 Landscape; Policy 62 Geodiversity; Policy 63 Water Environment; Policy 64 Flood Risk; Policy 66b Surface Water Drainage; Policy 72 Pollution; Policy 77 Public Access; and Policy 78 Long Distance Routes. Notwithstanding this, confirmation of compliance with these criteria as well as new issues raised by the policy are addressed below. Chapter 14: Socioeconomic Recreation and Tourism of the EIAR confirms that, whilst not significant in EIA terms, nonetheless the Proposed Development which relates to an £80million investment	The EIARAI Chapter 10 provides a revised assessment of the socio-economic, Toursim and recreation effects. Despite the removal of two turbines and a reduction of output from 80MW to 76MW, there is an increase in the construction value from £80 million to £96 million as the cost of WTGs has increased since the EIA was prepared. Table 14.1 of the EIAR was updated in the EIARAI. In summary the changes to not affect the signifcance of the effects predicted from that of the 20 turbine layout. Whilst not significant, the construction related impacts are in fact around 22% to 23% higher, suggesting greater economic (in GVA and jobs) effects as a result of the increased capital expenditure. The maximum reduction in magnitude of any operational impact is 6%. For the operational impacts, these small reductions in the magnitude of impact will not change that assessment of significance. There effects on tourism remain not signficant. All other effects – no change.

Policy Number/Title	Conclusion of Planning Statement assessment of 20 turbine layout	Changes to the assessment through 18 turbine revised layout
	is predicted (over the 50-year proposed consent period) to generate an expected total net economic impact for direct impacts and multipliers is of £90.82 million in GVA and 2,420 FTE jobs in Scotland. Taking the residual 50% of the multiplier impact and applying this to the Highland region, in total, an additional £71.5 million in GVA and 1261 FTE jobs would be anticipated. This extensive benefit over the lifespan of the Proposed Development underscores the vast economic opportunity which lies in onshore wind projects at both a national and local level and the contribution and positive effects the Proposed Development can have on the local and national economy. Similarly, when considering the direct impacts and employee spend, there is expected to be £162.44 million in GVA accruing to Scotland, of which £120.6 million will be within the Highland region. Also, there is expected to be 3180 FTE jobs supported in Scotland, of which around 1,983 will be within the Highland region. Chapter 14 of the EIAR also confirms the direct contribution that the development can make towards the Scottish Governments renewable energy targets relating to an equivalent of 50% of demand for electricity from renewable sources by 2030 and to secure complete decarbonisation by 2050. It also provides evidence (Sections 14.8.5 and 14.8.6 of the EIAR) that SSE are a substial investor into a number of wind farm schemes in the area which together over the 25 year lifetime of the four projects has resulted in an estimated £485 million to the UK economy, £327 million in Scotland and £131 million to the Highland Economy. Moreover, as a responsible developer, SSE has evidence of operating five community benefit funds in Sutherland which have provided, to date: £6.9 million to support 591 Sutherland projects since 2010; and a further £23.1 million to be invested over the lifetime of those wind farms. Following Covid-19 and the associated economic downturn, the cumulative effects of the Proposed Development with other schemes has the potential to support the recovery from Covid-19 supporting new employment and business opportunities,	

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	where SSE will seek, where possible, to support apprenticeships and use local labour as has been evidenced at the their other notable sites in the area (Gordonbush, Strathy and the existing Achany Wind Farms). Section 14.11.12 confirms that " *Local businesses will have the opportunity to benefit from the contracting requirements to be awarded by the Applicant. These range from civil engineering and ground work contractors, haulage businesses through to suppliers of water, as well as local service- based companies including hotels, restaurants and local shops*". Chapter 14: Socioeconomic, Recreation and Tourism of the EIAR confirms that the potential effects of the Proposed Development on recreation and toursim including visitor sites is negligible and not significant. Notwithstanding this conclusion, the EIAR confirms in Section 14.4.19 that Visit Scotland's position statement on wind farms states that there is a mutually supportive relationship between renewable energy developments and sustainable tourism. Whilst Chapter 7 Landscape and Visual Impact has identified potential effects on a minor road, core path and a localised section of a Scottish Hill track, the effects are during construction, short-term and temporary and, therefore, in terms of recreation and tourism are not considered to be significant. Compliance: The EIAR has demonstrated that the Proposed Development has addressed the policy requirements of Policy 67 and taken as a whole is considered to accord with it.	
Policy 72 Pollution	Compliance: The Proposed Development accords with Policy 72.	No change
Policy 77 Public Access	Compliance: The Proposed Development complies with Policy 77.	No change
Policy 78 Long Distance Routes	Compliance: The Proposed Development complies with Policy 78 to safeguard long distance routes.	No change

Onshore Wind Energy Supplementary Guidance 2016 (and update 2017)

3.4.4 The adopted Onshore Wind Energy Supplementary Guidance prepared by the Highland Council forms part of the development plan. It provides 10 criteria against which the Proposed Development requires to be assessed with regard to landscape and visual effects. There are no changes brought about by the 18 turbine revised layout which impact on the assessment contained in the 20 turbine layout Planning Statement, which should be referred to.

4. Summary and Conclusions

4.1.1 The primary objective of this statement is to provide an update from the 20 turbine layout Planning Statement to address any changes identified in the EIARAI assessment brought about by 18 turbine revised layout.

4.1.2 The primary component of the assessment is against the requirements of the Electricity Act. The Application is supported by an EIAR and subsequently the EIARAI which confirms that the Electricity Act requirements have been addressed. This is by virtue of the significant design evolution (as detailed in EIAR Chapter 2: Site Selection and Design Evolution and EIAR Technical Appendix 2.1 and the EIARAI Chapter 2) which provides evidence that the Applicant has undertaken their duty to do all that they reasonably can to mitigate the effects of the Proposed Development. This is further supplemented by EIAR Chapter 18 Schedule of Mitigation, which is unchanged by the 18 turbine revised layout and confirms the non-embedded mitigation identified by the EIA process, and committed to by the applicant, to comply with the requirements of the Electricity Act.

4.1.3 As an application made under the Electricity Act, the Development Plan is not the primary document. However, it is a material consideration in the determination of the application. In the exercise of their judgement, it is for Scottish Ministers to consider the weight which should be attached to the Development Plan in their assessment. Due to age of the Development Plan, it does not reflect the latest EU, UK and Scottish Government policy and guidance and direction of travel, which seeks to provide greater support for developments which make a contribution to: renewable energy targets; addressing Climate Change; and securing the move to full decarbonisation. It is therefore considered that the need to address the Proposed Development's contribution to these aims should be taken into account in the planning balance and afforded greater weight than the dated Development Plan.

4.1.4 This statement provides confirmation of additional International, UK and Scottish Energy and Planning policy, guidance and consultation documents published since the Application was submitted and which add to the evidence in support of the development. This is based on the increased international, UK-wide and Scottish requirement to address the climate emergency. The emerging consultation documents also confirm the Scottish Governments direction of travel for emerging energy and planning policy to meet demanding climate change and net zero targets and the role of the planning system in supporting wind farms such as the 18 turbine revised layout. The additional evidence provides significant support for the Application, which complies with the existing and emerging policy and guidance, having limited localised, but not unacceptable effects.

4.1.5 The EIARAI confirms that the changes proposed do not alter the significance of effects predicted within the EIAR and as such the assessment against the development plan remains as per the 20 turbine layout Planning Statement.

4.1.6 Although slightly reduced from the 20 turbine layout, the 18 turbine revised layout, as an extension to the existing Achany Wind Farm would:

- Adjust the installed capacity from 80MW to an estimated 76MW;
- Make the best us of available resources, through utilisation of land, access and infrastructure, where possible;
- Secure a reduction in carbon dioxide through provision of electricity from a renewable resource to replace fossil fuel generation (The Carbon Calculator document reference number is: UIRC-LUK8-7CN3);

- Provide an important contribution towards meeting the ambitious EU, UK and Scottish Government targets for renewable energy;
- Provide an important contribution to providing energy from renewable sources to help address the declared Climate Emergency by the Scottish Government and at the local level by The Highland Council; and
- Help provide a secure energy supply for Scotland.

4.1.7 The 18 turbine revised layout continues to accord with the increasing imperative for renewable energy development to address climate change and net zero targets, whilst providing an important contribution to Scotland's energy mix. It secures important jobs and economic benefits to rural Scotland and in particular to a fragile area. Critically, the Proposed Development recognises the need to balance the protection of the environment with the development of sustainable mixed communities.

4.1.8 In summary, the level of predicted significant effects is not changed from that of the 20 turbine layout and is considered to be limited for a development of this scale and is predominantly confined to effects in a localised area and, with the proposed mitigation, is not considered to conflict with the Development Plan read as a whole. It draws considerable additional support from other material planning considerations which are assessed as having greater weight including NPF3, SPP and other Energy and Climate Change Legislation and Policy. Accordingly, Scottish Ministers are respectfully encouraged to grant consent for the proposed Achany Wind Farm Extension.

sse Renewables

Key

- Site Boundary
- Turbine
- LiDAR
- Floated Track
- Founded/Cut Track
- Hardstanding
- Borrow Pit
- Temporary Construction Compound, Security, Storage And Batching Plant
- Substation, Welfare Facility And Store

Turbine T10 removed, hardstand removed and track to T20 removed

Turbine T20 and hardstand removed

Scale 1:20,000 @ A3

0 0.5 1 Km

N

Figure 2.2
The Revised Layout - Proposed Changes

Achany Extension Wind Farm
Additional Information