

FAO: Mr Josh McCormack
Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow, G2 8LU

SSE Renewables
1 Waterloo Street
Glasgow
G2 6AY

0141 224 7337

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Dear Mr McCormack,

Reference: Glencassley Wind Farm (ECU00001930) – Request for refreshed Scoping Opinion and notice of project name change to Achany Extension Wind Farm

Introduction

In August 2019, SSE Generation Ltd (SSEG) “the Applicant” submitted a Scoping Report for the proposed construction and operation of an onshore wind farm to generate renewable energy from wind power (see **Appendix A – Glencassley Scoping Report – August 2019** and referred to hereafter as the 2019 Scoping Report). The proposed development is located within the Glencassley and Glenrossal Estates, situated between the River Cassley and Loch Shin near Lairg, Sutherland, in the Highlands. (see **Figure 1 – Site Location Plan**).

The 2019 Scoping Report set out the proposed scope of the Environmental Impact Assessment (EIA) Report to accompany the section 36 application and requested a Scoping Opinion on behalf of the Applicant. A Scoping Opinion, on behalf of Scottish Ministers under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, was issued in October 2019 by the Energy Consents Unit (Reference ECU00001930) (see **Appendix B – Glencassley Wind Farm – 2019 Scoping Opinion** and referred to hereafter as the 2019 Scoping Opinion).

The 2019 Scoping Opinion states that advice regarding the requirement for an additional Scoping Opinion be sought from Scottish Ministers if an application for consent has not been made within 12 months of the relevant Scoping Opinion. This is the case for this project and therefore the purpose of this letter is to provide an update on the proposed development and seek confirmation from Scottish Ministers where changes in the scope of the EIA Report may be deemed appropriate, either as a result of a change in guidance, policy or to the proposed development itself.

Consent for the proposed development would be sought by means of an application to Scottish Ministers under Section 36 of the Electricity Act 1989 and associated deemed planning permission sought under Section 57(2) of the Town and Country Planning (Scotland) Act 1997.

Background

An application to construct and operate a 26 turbine wind farm and associated works on Glencassley Estate was submitted to the Scottish Governments Energy Consents Unit in 2012. The Highland Council North Planning Applications Committee recommended to raise no objection to this application in 2013, however, it was refused by Scottish Ministers in 2015, in respect of impacts on the Assynt Coigach National Scenic Area (NSA) and on wild land.

As the site offers excellent potential for a wind farm development due to its wind resource and proximity to existing wind development, the 2019 Scoping Report proposed to review and optimise the 2012 Glencassley Wind Farm design, taking previous concerns raised about the prominence and proximity of turbines in views from the nearby Assynt Coigach NSA and to core areas of wild land, into consideration. Initial site optimisation design focused on moving the site further from the National Scenic Area at the north western end, closer to the operational Achany and Rosehall Wind Farms, located at the south eastern end of the site, to deliver sustainable, subsidy free renewable energy. The 2019 Scoping Report included a 'Proposed Development Area' (see **Figure 2 –Proposed Development Area**), within which the siting and location of turbines would be considered

Project Update

Following ongoing technical analysis and environmental survey works carried out since the 2019 Scoping Report, the site design evolution and optimisation has been progressed and an indicative site layout has evolved. Although this layout is not fixed at this point and further refinements and amendments may result, it is considered that the proposed development could accommodate 20 turbines with a tip height of approximately 149.9m, delivering an installed capacity in excess of 50 MW towards Scottish Government's renewable energy targets. The number of turbines and installed capacity would ultimately depend on final environmental and technical assessments. A scoping update layout is presented in **Figure 3 –Indicative Site Layout (Scoping Refresh)**.

Figure 3 illustrates that the proposed wind turbine generators are located approximately 2km closer to the operational Achany Wind Farm in comparison to the 2012 Glencassley Wind Farm. Moving the proposed wind turbines closer to the existing Achany turbines brings operational benefits in managing and maintaining both sites. Furthermore, the proposed development through its use of existing Achany Wind Farm access tracks, passing places, borrow pit reuse and potentially operational building and storage infrastructure, minimises additional site requirements. Therefore, the project has evolved through the iterative design process to form an extension to the existing operational Achany Wind Farm and it is submitted that the site is renamed as Achany Extension Wind Farm, to more accurately reflect the proposed development.

The iterative design process undertaken to date has sought to address the points of objection raised against the 2012 Glencassley Wind Farm application along with the concerns maintained in the 2019 Scoping Opinion. The Achany Extension wind turbines are now located approximately 10km (at its closest point) from the Assynt Coigach NSA and situated closer to the edge of the NatureScot Reay Cassley Wild Land Area 34, in closer proximity to the operational Achany Wind Farm infrastructure. Similarly, in seeking

to evaluate and address the recommendations set out in the 2019 Scoping Opinion in respect of turbine lighting, the height of turbines is now proposed at 149.9m, ensuring that a visible lighting scheme is not a mandatory requirement under the Civil Aviation Authority (CAA) requirements. Furthermore, it is proposed to remove the 4x4 track that was proposed in the 2019 Scoping Report to the north west of the site to address the environmental concerns raised surrounding this access track.

Changes in Scope

The following table notes any departures from the 2019 Scoping Opinion as a result of changes to the proposed development, policy or guidance. Clarification is also provided where required in relation to matters raised in the 2019 Scoping Opinion.

Table 1 – Changes in Scope and Clarification

EIA Discipline	Changes in Scope
Landscape and Visual	<p>The proposed reduction in turbine height to below 150m ensures that a visible lighting scheme is not a mandatory requirement under Civil Aviation Authority (CAA) requirements. It is acknowledged that a suitable aviation lighting scheme would still require to be agreed with the Ministry of Defence (MOD), but it is anticipated that this would be infrared lighting. As such, a night time lighting assessment can now be scoped out of the Landscape and Visual Impact Assessment (LVIA) of the EIA Report.</p> <p>Following review of Scoping responses, it is now proposed to undertake Wild Land Assessments for two Wild Land Areas: WLA 34 (Reay – Cassley) and WLA 37 (Foinaven – Ben Hee). The Wild Land Assessments will be completed in accordance with NatureScot’s now updated Wild Land Assessment Guidance: ‘Assessing Impacts on Wild Land Areas – Technical Guidance’ (NatureScot, 2020), rather than the out of date interim 2007 or draft 2017 guidance documents.</p> <p>Following review of Scoping responses and ZTVs for optimised layout proposals, Viewpoint (VP) locations have been refined and modified where necessary to ensure that the proposed development would be adequately represented. Two VPs from the original Glencassley application have been added back in: Rhilochan (VP no. 4) (to represent views from properties and landscape areas to the east) and Carn Chuinneag (VP no. 18) (representative of mountain views from the south and considered to be a useful VP for cumulative assessment). Photomontages are now proposed to be included for all VPs. A full list of the updated revised VPs is included in Appendix C, and an indicative ZTV is provided in Figure 4 – Zone of Theoretical Visibility.</p>

	<p>As the height of the proposed turbines has now been fixed at 149.9m, a 40 km Study Area will be adopted for the LVIA in accordance with best practice guidance, Visual Representation of Wind Farms, v2.2 (SNH (now NatureScot), 2017). A further detailed study area of 20 km is proposed within which more detailed assessment of landscape character, and visual assessment of settlement areas and routes will be undertaken. Due to their greater sensitivity and importance, all designated landscapes within the 40km study area will be assessed for potential significant effects. Visual effects within the wider study area will be assessed on the basis of the representative viewpoints which have been selected. It is considered that this approach will adequately identify all potential significant effects. However, any further potentially significant effects which are identified as the LVIA progresses will be given full consideration. The study areas for the cumulative assessment will be the same as those for the LVIA but all wind farms within a 60 km search area will be considered for inclusion within the assessment.</p>
Ecology	<p>Since the 2019 Scoping Opinion, survey effort has focused on updated habitat surveys (Phase 1 and NVC with focus on peatland condition), protected species surveys and bat surveys. Fisheries surveys have also been undertaken in light of the 2019 Scoping Opinion.</p> <p>Consultation has been undertaken with NatureScot in relation to the approach, timing and methodology of bat surveys. A slight extension of the Spring 2020 survey season was required given Covid-19 restrictions at the time, and NatureScot agreed this was acceptable.</p> <p>In accordance with the 2019 Scoping Opinion and more recent discussions with NatureScot, the ecology chapter of the EIA Report will include consideration of potential impacts on the Caithness and Sutherlands Peatlands SAC, the River Oykel SAC, on-site peatland habitats and deer management.</p>
Ornithology	<p>Following review of the advice contained in the 2019 Scoping Opinion, two years of bird surveys have been undertaken at the proposed development site (2019 and 2020).</p> <p>As was widely the case in 2020, survey work for wind farm projects in Scotland was interrupted by Government restrictions put in place because of the Covid 19 pandemic. The project's ornithology team worked to minimise the interruption to baseline data collection, and whilst surveys had to be missed in April 2020 due to Covid 19 restrictions, the overall survey effort was increased in May, and notably in relation to flight activity, survey effort was intensified in order to meet NatureScot survey guidelines.</p>

	<p>Vantage Point locations have been chosen with care, and with consideration of topography and distance to turbine locations. Detailed information on survey effort and justification of vantage point locations will be set out in the EIA Report.</p>
Hydrology and Hydrogeology	<p>Survey and assessment has been undertaken to confirm the hydrological and hydrogeological conditions at the site, including the presence and sensitivity of ground water dependent terrestrial ecosystems.</p> <p>No anticipated changes in scope from the 2019 Scoping Opinion.</p> <p>The results of the GWDTE assessment and confirmation of hydrological constraints on site will be shared with SEPA and NatureScot during further pre-application discussions.</p>
Geology and Soils / Peat	<p>Stage 1 peat probing surveys have been carried out across the site to inform layout decisions. More detailed Stage 2 peat probing surveys are being carried out as the layout is refined.</p> <p>No anticipated changes in scope from the 2019 Scoping Opinion.</p> <p>The results of peat probing surveys will be shared with SEPA and NatureScot during further pre-application discussions.</p>
Cultural Heritage	<p>No anticipated changes in scope from the 2019 Scoping Opinion.</p>
Traffic and Transport	<p>No anticipated changes in scope from the 2019 Scoping Opinion.</p>
Noise	<p>No anticipated changes in scope from the 2019 Scoping Opinion.</p> <p>Discussions with the Environmental Health Officer of The Highland Council were undertaken in May and July 2020 to agree the approach and methodology for the noise assessment and confirmation of baseline monitoring locations. Baseline noise monitoring was undertaken in July 2020, the results of which will inform the assessment of impacts and associated mitigation, where required. This will be detailed in the noise chapter of the EIA Report.</p>
Aviation	<p>An assessment of the proposed development on aviation interests will be included in the EIA Report. The proposed reduction in turbine height to below 150m ensures that a visible lighting scheme is not a mandatory requirement under CAA requirements. It is acknowledged that a suitable aviation lighting</p>

	scheme would still require to be agreed with the MOD, but it is anticipated that this would be infrared lighting.
Socio-Economics	An assessment of the proposed development on socio-economic effects will be included in the EIA Report.

Next Steps and Programme Update

It is now anticipated that submission of a Section 36 application will be made to Scottish Ministers in June 2021. In advance of this, the following activities will occur:

- Pre-application discussions with statutory consultees to provide further information on baseline data and the proposed layout;
- Pre-application meeting with the Council, Statutory Consultees and the Energy Consents Unit, to be arranged through The Highland Council's pre-application service;
- Public consultation events, either virtual or in person events, depending on Government Covid-19 guidelines at the time; and
- Provision of Gate Check Report to the Energy Consents Unit to confirm EIA Report is produced in accordance with the Scoping Opinion.

I look forward to hearing from you in due course, however, please feel free to contact me at any time if you have any comments or queries.

Yours sincerely,

[Redacted]

Karen Anderson
Consent Manager

Figure 1 – Site Location Plan
Figure 2 – Proposed Development Area
Figure 3 – Indicative Site Layout (Scoping Refresh)
Figure 4 – Zone of Theoretical Visibility

Appendix A – Glencassley Scoping Report – August 2019
Appendix B – Glencassley Wind Farm – 2019 Scoping Opinion
Appendix C – Updated Viewpoint List