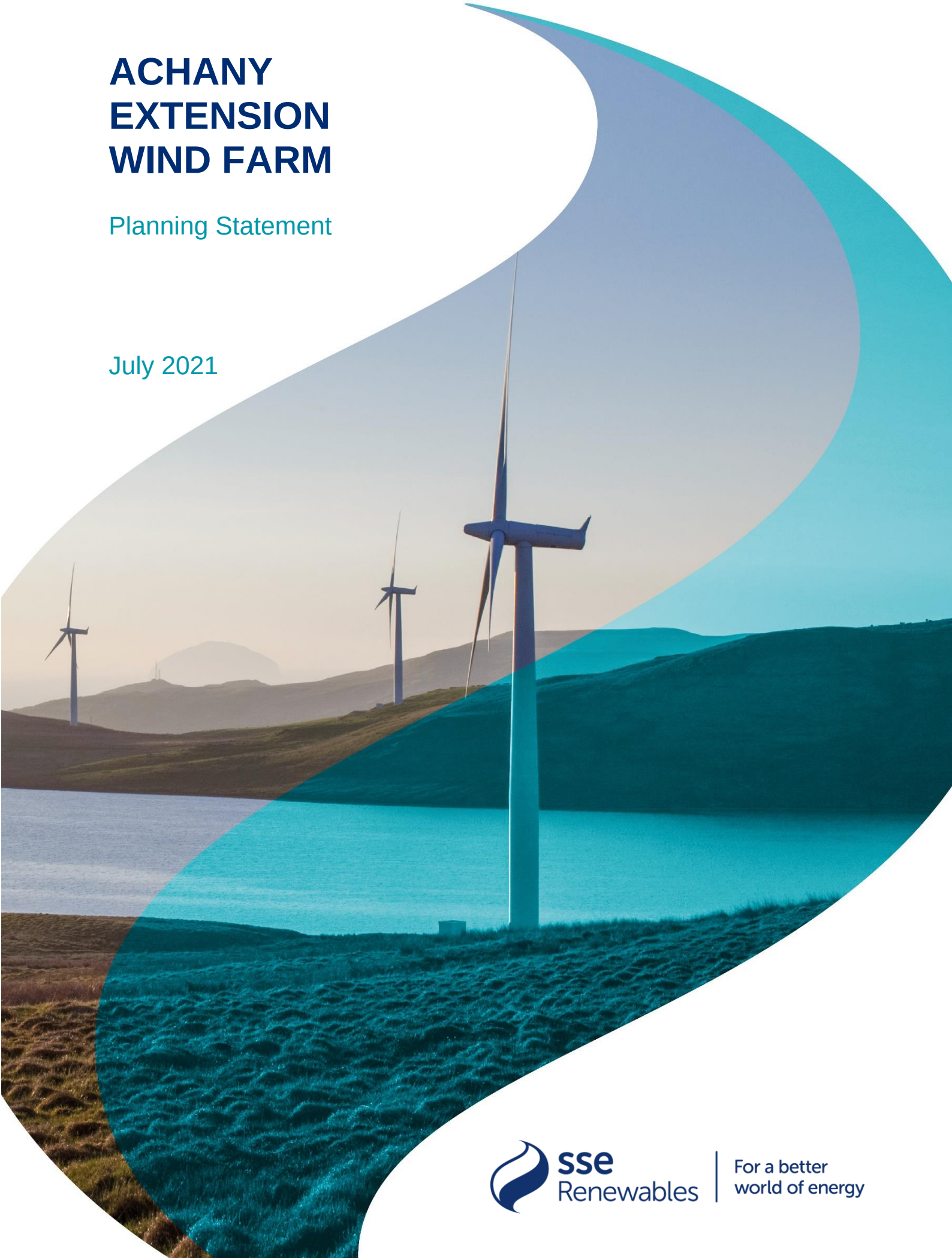
ACHANY EXTENSION WIND FARM

Planning Statement

July 2021



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Glossary and Abbreviations

Abbreviation	Description
Section 36 application	Application made under Section 36 of the Electricity Act 1989
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
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
EU	European Union
NPF3	National Planning Framework 3, Scottish Government, June 2014
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 Application Details

1.1.1 This Planning Statement is provided in support of an application made under Section 36 of the Electricity Act 1989 ('Electricity Act') for the Achany Extension Wind Farm ("the Proposed Development"). The application is made on behalf of SSE Generation Limited (the "Applicant"). Deemed planning permission under Section 57(2) of the Town and Country Planning Act 1997, as amended, is also sought. The Applicant holds the necessary generation licence required to operate the Proposed Development.

1.1.2 The application is supported by an Environmental Impact Assessment Report ('EIAR') prepared in accordance with the relevant provisions of the Electricity Works (Environmental Impact Assessment (Scotland) Regulations 2017 and the Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020 (referred collectively as the 'EIA Regulations').

1.1.3 This Planning Statement does not form part of the EIAR. It is a separate document but draws upon the findings presented in the EIAR for the purposes of appraising the Proposed Development against the relevant planning policy and other material considerations.

1.1.4 This Planning Statement has been prepared by 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. It has been overseen by Michael Gordon BSc (Hons) DipTP PhD MRTPI, a Senior Director at Turley, who has over 23 years' planning experience including considerable experience in the renewables sector and previously sat on the Renewables subgroup of the Northern Ireland Minister's Planning Forum. He has been a planning expert witness at Public Inquiries for renewable proposals in respect of both greenfield sites and also repowering and extension projects.

1.2 Purpose of the Planning Statement

1.2.1 This Planning Statement is required to present the Proposed Development on the application site (hereafter referred to as 'the Site') within the context of the current Planning Framework, which comprises the prevailing Development Plan and other relevant material planning considerations. Following an overview of the Proposed Development within the introduction of this Planning Statement, the legislative, policy context and key drivers for the development will be outlined, followed by an assessment of the Proposed Development including material considerations, which should be appropriately weighed in the planning balance.

1.2.2 To ensure that this statement focuses solely upon the key issues and assessment of the proposal against the Planning framework, this Planning Statement will confirm where the EIAR findings support policy requirements and provides a more detailed focus on those matters which the EIAR found to be significant. It is important to note that the information contained within the EIAR will give a more detailed focus to, and an explanation of, the issues discussed within this Planning Statement.

1.2.3 The Planning Statement is structured as follows:

- Section 2 Statutory Provisions;

- Section 3 Assessment; and
- Section 4 Conclusions.

1.3 Approach to Planning

1.3.1 In assessing a Section 36 application, Scottish Ministers 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 Should the Scottish Ministers decide to grant Section 36 consent under the Electricity Act, then it is also within their powers whether they direct that deemed planning permission be also granted.

1.3.3 This Planning 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 design of the proposal and as demonstrated by the EIAR. 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 Planning Statement.

1.3.4 Scottish Ministers will also take into account a range of additional material considerations which are identified within this Planning Statement.

Planning History

1.3.5 The Applicant submitted a Section 36 application for a 26 turbine wind farm at Glencassley to Scottish Ministers through the Energy Consents Unit (reference EC00005263), in 2012 ('2012 application'). The 2012 application was consulted upon with the local planning authority The Highland Council ('THC') who recommended that no objection should be raised. It was however refused by Scottish Ministers in 2015 based on impacts on the Assynt Coigach National Scenic Area ('NSA') and on wild land. The decision notice (Appendix 1 of this Planning Statement: 2012 Decision Notice) provides the detailed conclusions of Scottish Ministers on the previous application, summarised below.

- Support from National Planning Framework 3 ('NPF3') which seeks to make Scotland a leading location for renewable energy technology.
- Support from NPF3 regarding how renewable energy technology can support remote areas, bringing employment, reverse population decline and stimulate demand for development and service.
- Support from NPF3 in respect of onshore wind's contribution to diversification of energy supplies, in the right places, and not within our National Parks and National Scenic Areas.

- The 2012 application was predicted to make a significant contribution towards meeting greenhouse gas emissions and renewable energy targets, as well as diversification of energy supplies. However, despite careful consideration of turbine locations and landscape and visual impacts, significant impacts on wild land and impacts on the special qualities of the Assynt-Coigach National Scenic Area ('NSA') meant that on balance the proposal was not supported by Scottish Planning Policy ('SPP').
- The application was broadly supported by supplementary guidance and the Highland Wide Development Plan ('HwLDP'), according with 9 of 11 criteria of the HwLDP with adverse impact under landscape and visual impact and amenity as sensitive location, but not which resulted in an objection to the development. This support was weighed against the significant impacts on the Assynt – Coigach NSA and wild land and benefits of the Development under SPP.
- With regard to the River Oykel SAC designated for Atlantic salmon and freshwater pearl mussel, the Caithness & Sutherland Peatlands Special Area of Conservation ('SAC') (Ramsar Site and Grudie Peatlands and Strath an Loin Site of Special Scientific Interest ('SSSI')) designated for peat, heath and freshwater habitats, rare plant and otter, and the Caithness & Sutherland Peatlands Special Protection Area ('SPA'), classified for a number of wader and raptor species an Appropriate Assessment was undertaken and found that there would not be an adverse effect on the integrity of either the SAC or SPA subject to imposition of conditions.
- Ministers noted the Development overall was not seen as having a significant visual impact on local communities and settlements.
- The Development would not compromise the integrity of the Assynt-Coigach NSA, however the Development would have some adverse effect on special qualities of the NSA, namely "*A landscape of vast open space and exposure*" and "*Significant tracts of wild land*". The significant adverse effects on the wild land resource in this area of the NSA would be the reduction of peripheral wild land resource, altering perception of place within the eastern extent of the NSA.
- The 2012 application would introduce tall moving structures into an area of high wildness that is currently free from such development. The proximity of the proposed Glencassley development, combined with its larger extent of visibility, produces a much greater impact upon the Search Area for Wild Land than Rosehall and Achany and was not considered to comply with the relevant policy tests in the new SPP for wild land for the wild land area identified as the Reay-Cassley WLA.
- Ministers confirmed that wind farms on wild land may be appropriate in some circumstances, where it can be demonstrated that significant effects on the qualities of the area of wild land can be substantially overcome by siting, design or other mitigation. Ministers concluded that the wild land impacts were unacceptable and could not be mitigated. The effects on the qualities of the wild land area were not reduced to a degree sufficient to make the Development consistent with the approach on spatial frameworks set out in SPP.
- The 2012 application would help to reduce carbon emissions to a sufficiently appreciable degree supported, in principle by the relevant parts of national legislation and policy, to which it could make a valuable contribution.
- The Ministers considered that with regard to economic impact, the development is likely to have some positive socio-economic effects.

- Impacts on tourism were considered to be low and unlikely to be significant.

1.4 Iterative Design Process

1.4.1 The Applicant considered that due to the proven wind resource and proximity to existing wind farm development (and associated potential to minimise infrastructure requirements) the potential from the site as recognised by Scottish Ministers in their decision of the 2012 application should be reviewed. The aim of the review was to confirm the potential of the site against the backdrop of evolving national policy on climate change, declared climate emergency and the ongoing support for the onshore wind sector, to establish if a design could be promoted which could contribute to the current renewable energy and net zero targets whilst addressing the reasons for refusal of the 2012 application.

1.4.2 The EIA process has involved undertaking design iterations, consultations with statutory and non-statutory consultees to ensure that the full range of environmental and technical considerations have been addressed, and where necessary, mitigation and enhancement measures have been committed to. The Applicant accepts the requirement to condition the proposed mitigation. As such, the submitted design and layout ensures that the residual or cumulative effects of the development have been fully assessed by the EIA team, and are considered, in their professional opinion, to be the most appropriate design for the Proposed Development.

1.4.3 Full details of the design iteration process are contained within Chapter 2: Site Selection and Design Evolution of the EIAR and within the accompanying Design Statement (EIAR Technical Appendix 2.1).

1.4.4 The site is located within an area with proven potential for wind farm development. This is due to the wind resource, the ability to utilise existing site access and other infrastructure to limit and minimise the requirement for new infrastructure. Due to the presence of other wind, hydro and electrical infrastructure, including the existing Achany Wind Farm, this also brings other operational and maintenance benefits. With the clear potential to contribute to the ambitious targets for renewable energy generation and in the context of the Climate Emergency (as detailed in Chapter 2), the Applicant has undertaken a detailed review of the previous scheme. This has resulted in a substantial evolution from the original proposal to the current Proposed Development.

1.4.5 The site is located within Group 2 'Area of Significant Protection', as defined Scottish Planning Policy ('SPP') due to its location within the south-east tip of the NatureScot's Wild Land Area 34: Reay – Cassley ('WLA34') and the potential presence of carbon rich soils, deep peat and priority peatland habitat. Group 2 means that it is a location where development may be appropriate in some circumstances where it can be demonstrated that significant effects can be overcome by siting, design, or other mitigation. SPP paragraph 215 specifically refers to wild land and states "*In areas of wild land, development may be appropriate in some circumstances*"; and where "*further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation*."

1.4.6 The design evolution was informed through detailed landscape and visual impact assessment and the initial decision was made to move the site further to the south east and closer to the existing Achany Wind Farm with turbines up to 200m which resulted in a Preliminary Layout. The design was then informed by the landscape architects who considered the landscape and visual impact perspective with the aim of reducing

potential effects on wild land and NSA. This exercise concluded with a limit on the extent of the turbines requiring them to be confined to locations to the south of Beinn na Sgeireach and also a maximum height of 149.9m to minimise landscape and visual effects and to remove the requirement for visible lighting. This culminated in the Landscape and Visual Optimised Layout.

1.4.7 Two further iterations were developed to take account of technical requirements and other constraints and to limit any potential significant effects, in particular with regard to survey work and peat probing. This culminated in a more refined Optimised and then Final Layout, which achieved the maximum output whilst also minimising potential environmental effects. The final layout ensured that it incorporated the requirement to adhere to the visual and landscape limits to ensure the previous reasons for refusal could be substantially overcome.

1.4.8 Therefore, a thorough process of design development was undertaken for the Proposed Development in order to minimise the potential for significant effects on Wild Land Area 34: Reay Cassley. This has included the following:

- The design iterations for the Proposed Development have resulted in the turbine footprint being pushed as far south as possible, to the periphery of the WLA to minimise the extent and range of intervisibility and maximise the distance between the proposed turbines and the Central Core and the north of the 'Western Lobster Claw' where the greatest extent of higher wildness is considered to be present.
- The retention of the turbines at the southern tip of the WLA is also considered to create a closer connection with the existing Achany and Rosehall wind farms which already lead to a clear limit to the extent of the WLA in this area, and ensures that virtually all parts of the WLA, other than the area directly affected and a small area to the east of the turbines, would retain the connection to the greater body of the WLA to the north and west.
- The development of the turbine layout has aimed to minimise the presence of turbines on higher ground and maintain a cohesive grouping of turbines to minimise the visual envelope of the Proposed Development across the WLA as far as possible and the appearance of turbine spread or outlier turbines.
- The height of the proposed turbine has been reduced to under 150m in order to avoid the effects of visible aviation lighting on the WLA.
- The use of existing infrastructure has been considered where possible, to minimise the need for new tracks to be built.
- The location of tracks and permanent ancillary features such as the substation and welfare facilities has been given careful consideration in relation to the topography of the site, to minimise their visual extent.
- A high standard of reinstatement is proposed for temporary areas and borrow pits as described in the Outline Construction Environmental Management Plan (Technical Appendix 3.1) and the Design Statement (Technical Appendix 2.1), and would be implemented and monitored to ensure success as detailed in the Outline Habitat Management Plan (Technical Appendix 8.10).

1.4.9 This has resulted in the Proposed Development being situated at the far southern tip of the WLA where existing wind turbines and forest areas already limit its perceived extent, thereby enabling the connection between the vast majority of the southern part of the WLA to the east and west of Glen Cassley, and the mountainous landscapes to the north

and west, which make up the greater majority of the WLA and where the greater extent of wild land is already perceived, to be retained.

1.4.10 Within the southern tip, around the more immediate confines of the Proposed Development and within a very small area to the east of the Proposed Development some of the physical and perceptual attributes of wild land which contribute to one of four WLA Key Qualities, *"Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains,"* may be less likely to be experienced. However, this would be a very minimal and peripheral part of the WLA overall where the WLA Key Quality is not considered to be strongly present due to the proximity of the existing Achany and Rosehall Wind Farms which are seen from higher ground, and the relatively contained nature of the lower lying corries which results in the perceptions of openness, awe and connection to the mountains not being fully obtained.

1.4.11 Beyond the close confines of the Proposed Development, the appearance of the Proposed Development in the south-eastern context may lead to some localised significant effects to the WLA Key Quality across small parts of the upland plateaux areas to the east and west of Glen Cassley. However, it is considered that all of the physical attributes and perceptual qualities which are required to establish the presence of wild land would remain in these areas due to the continued association with the main body of the WLA to the north and west.

1.4.12 No significant effects are anticipated to any other part of the WLA, the vast majority of which would be completely unaffected. All of the WLA Key Qualities would therefore continue to be well expressed within the WLA and, despite the potential reduction in the portrayal of some attributes and key qualities within a small peripheral area, it is considered that the integrity of WLA 34 would be retained.

1.4.13 In relation to the national planning policy position set out in SPP, it is considered that it has been demonstrated that the significant effects on the qualities of the WLA have been substantially overcome by siting, design and other mitigation.

1.5 The Proposed Development

1.5.1 The Proposed Development comprises up to 20 Wind Turbine Generators ('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 in excess of 80MW. Therefore, the combined capacity of Achany Wind Farm and the Proposed Development is anticipated to be in excess of 118MW.

1.5.2 The Proposed Development forms an extension to the operational Achany Wind Farm, located on adjoining land to the north-west of the existing wind farm. The Site, as illustrated by the 'Site Boundary' on Figure 1.1: Location Plan of the EIAR, is approximately 979.76Ha in area and is located approximately 4.5km north of the village of Rosehall and approximately 11km west-north-west of Lairg.

1.5.3 A full description of the Proposed Development is contained within Chapter 3 Description of Development of the EIAR. The Proposed Development would include the key components, which are shown on Figure 3.1: The Proposed Development of the EIAR (as contained in Appendix 2 of this Planning Statement). The location of the key components of the development have been informed by detailed survey work, EIA and micro-sited to

the Final 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 and THC, as required.

1.5.4 The key components of the development include:

- A generating station comprising of up to 20 no. wind turbines of up to 149.9m tip height with internal transformers ('WTGs) which will be automatically controlled to face directly into the wind (the final choice of turbine is to be confirmed, and would be dependent on economics and available technology at the time of construction) together with ancillary development;
- Foundations, crane hardstanding and associated laydown area at each wind turbine location (as indicatively shown in the EIAR, Figures 3.3: Indicative WTG Foundations and 3.6 Indicative Crane Hardstanding Area);
- On site access tracks (of which approximately 17.3km are new access tracks and approximately 6.6km are existing tracks where upgrades may be required to facilitate delivery of the wind turbine components) and associated access track drainage and water crossing (as detailed in EIAR Technical Appendix 10.1);
- A new on-site substation (shown in EIAR Figure 3.8a and 3.8b), welfare building (shown in EIAR Figure 3.9a and 3.9b) and store (shown in EIAR Figure 3.10a and 3.10b);
- Potential extension to the existing operations building at Achany Wind Farm to accommodate additional staff (this option is discussed in detail in Section 3.3.37 of the EIAR);
- A network of underground cabling to connect each wind turbine alongside the access tracks where suitable or as otherwise agreed with The Highland Council ('THC'), Scottish Environmental Protection Agency ('SEPA') and the Site Ecological Clerk of Works ('ECoW') to the on-site substation within the site boundary.
- The grid connection from the onsite substation to the National Grid would be subject to a separate S.37 application for consent by the network operator (Scottish and Southern Electricity Networks). Details of the grid connection are undefined at this stage, but it is anticipated that the grid connection would connect to Shin Substation;
- A LiDAR unit (EIAR Figure 3.5: Indicative LiDAR) to collect meteorological and wind speed data, and associated hard standing of a maximum 4.7m x 3.7m; and
- Any other associated ancillary works required.

1.5.5 In addition to the permanent components, the construction phase would comprise the following temporary facilities:

- Site compound areas, including welfare facilities, site cabins, storage and parking (Indicatively shown in EIAR Figure 3.7);
- Batching plant facilities for temporary concrete batching plants, including batching towers and a number of feeder hoppers to store constituent parts;
- Temporary telecommunications infrastructure; and

- Borrow pits, comprising both new and the reworking of a borrow pit used previously for Achany Wind Farm to provide approximately 250,000m³ of stone, to be reinstated as per details within EIAR Technical Appendix 11.1: Borrow Pit Assessment.

1.5.6 Given the location adjacent to the existing Achany Wind Farm, the Proposed Development would be able to utilise some existing access tracks, although localised widening may be required to facilitate delivery of components. Approximately 17.3km of new access tracks would be required with a minimum of 4.5m width running surface with localised widening on corners and passing places during construction and operation. Further details are provided within the Design and Access Statement (EIAR Technical Appendix 2.1).

1.5.7 Access for construction and operation would be through the existing access to Achany Wind Farm, off the A839.

1.5.8 A habitat management plan will be implemented to compensate for the loss of blanket bog habitat, an outline of which is contained in Technical Appendix 8.10: Outline Habitat Management Plan of the EIAR.

1.5.9 A Peat Management Plan will be prepared by the principal contractor to address removal of topsoil (where peat is present) associated with construction, a draft of which is contained in EIAR Technical Appendix 11.3.

1.5.10 A Construction Environment Management Plan ('CEMP') will be prepared to address the construction phases to protect the receiving environment and an Outline CEMP is provided as EIAR Technical Appendix 3.1.

1.5.11 Construction activities are anticipated to be between 07.00 and 19.00 hours Mondays to Fridays, and 07.00 to 14.00 hours on Saturdays, unless otherwise agreed with THC. Blasting would be between the hours of 10.00 to 16.00 on Monday to Friday and 10.00 to 12.00 on Saturdays (no blasting on Sundays or National Public Holidays, unless otherwise agreed with the THC).

1.5.12 The typical site reinstatement works to take place during and following construction is provided in EIAR Technical Appendix 3.1. Site decommissioning at the end of the operational lifespan is estimated to be 12 months and the proposed details would be agreed prior to decommissioning activities taking place. A condition could be attached to confirm the proposed 50 year duration of the consent and a requirement to confirm the details of any re-powering or decommissioning at an appropriate period prior to the end of the consented period.

1.5.13 It is estimated that the maximum permanent development footprint of the Proposed Development would be approximately 13.29Ha. During the construction period it is estimated that a further 10.95Ha would be temporarily required which would be reinstated following completion of the construction works.

2. Statutory Provisions

2.1 Electricity Act 1989

2.1.1 The Proposed Development comprises an extension to the existing Achany Wind Farm, which alone is anticipated to generate in excess of 80MW. It therefore requires to be determined under Section 36 of the Electricity Act 1989 ('the Act'), which establishes that where generating stations will result in a capacity over 50MW that they shall not be constructed, extended or operated except in accordance with a consent granted by Scottish Ministers and subject to serving notice on the relevant Planning Authority (the Highland Council ('THC')), in accordance with Schedule 8(2) of the Act.

2.1.2 Section 36 of the Electricity Act sets out a list of environmental matters in Schedule 9 (paragraph 3(1)(a)) which Scottish Ministers must have regard to in reaching a decision. This includes having a regard to:

"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 archaeological interest".

2.1.3 Schedule 9 Paragraph (3)(1)(b) also places a duty on the person formulating the proposals to do what he reasonably can to mitigate the effects of the proposal on the matters outlined within Schedule 9 Paragraph (3)(1)(a).

2.1.4 In considering Section 36 proposals, paragraph 3(2) of Schedule 9 requires Scottish Ministers to have regard to: (1) the desirability of the matters mentioned in paragraph 3(1)(a) of Schedule 9; and (2) the extent to which the person by whom the proposals were formulated has complied with his duty.

2.2 The Town and Country Planning (Scotland) Act 1997 (as amended)

2.2.1 Section 57(2) of the Town and Country Planning (Scotland) Act 1997 (as amended) ('1997 Act') states that:

"On granting or varying a consent under section 36 or 37 of the Electricity Act 1989, the Scottish Ministers may give a direction for planning permission to be deemed to be granted, subject to such conditions (if any) as may be specified in the direction".

2.2.2 Therefore, Section 36 applications do not need to be separately assessed under the provisions of the 1997 Act which require decisions to be made in accordance with the development plan unless material considerations indicate otherwise. Notwithstanding this, the planning system plays a key role in protecting these very interests and this Planning Statement will outline the relevant policy and guidance, including the development plan which, although are not of the same weight as those considered under S.25 of the 1997 Act, are nonetheless material considerations relevant to the determination of the Proposed Development. The Assessment within Section 3 of this assessment will take account of the age of the development plan (adopted 2012) and the presumption provided in Scottish Planning Policy 2020[1], in favour of sustainable development.

[1] Scottish Government, Revision December 2020: Scottish Planning Policy. Available at: https://www.gov.scot/publications/scottish-planning-policy/pages/7/ (last accessed on 19 April 2021).

2.3 Electricity Works Regulations

2.3.1 The application and supporting Planning Statement has been prepared on the basis of the findings of the EIAR, which has been prepared in accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017[2] and The Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020[3].

2.4 International, UK-Wide and National Energy, Climate Change, Energy and Planning Legislation, Policy and Guidance

2.4.1 The justification for the Proposed Development is set within the context of legislation, policy and guidance and renewable energy targets set at International, UK and Scottish Government levels. These are material considerations in the determination of the application. With a recognised Climate Emergency, there has been a focussed effort both to curb the emissions of greenhouse gases and to secure renewable sources for the generation and secure supply of electricity to reduce the dependence on fossil fuels. Onshore wind is recognised as an established and important resource which can help achieve the climate and energy targets set at the International, UK and Scottish levels. The ambitious targets which have been set require the approval and implementation of suitable renewable energy developments.

2.4.2 The most relevant renewable energy and climate change legislation, policy and guidance at an international, UK and national levels to the Proposed Development are summarised below. These set out the context and the identified need against which the Proposed Development can be assessed in terms of its contribution to meeting identified targets and securing suitable renewable energy generation.

<u>The United Nations Adoption of the Paris Agreement COP21 (December 2015)[4]</u>

2.4.3 197 countries, including the UK, adopted the Paris Agreement at the 21st Conference of the Parties (COP21) in Paris in 2015. This is an agreement which seeks to reduce global greenhouse gas emissions and to limit the global temperature increase in this century to 2 degrees Celsius, while pursuing the means to limit this to 1.5 degrees Celsius. This was ratified by the UK in November 2016 and now forms part of UK Government Policy.

<u>The UK Climate Change Act 2008[5] (and amendment 2019[6])</u>

2.4.4 In November 2008, the Climate Change Act became law requiring the UK to reduce Carbon Dioxide (CO_2) emissions and was updated in 2019 to provide a legal basis for the

[2] Scottish Government, Scottish Statutory Instrument 2017 No 101: The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017. Available online at: https://www.legislation.gov.uk/ssi/2017/101/contents/made (last accessed on 13 April 2021)
[3] Scottish Government, Scottish Statutory Instrument 2020 No 123: The Electricity Works (Miscellaneous Temporary Modifications) (Coronavirus) (Scotland) Regulations 2020. Available online at: https://www.legislation.gov.uk/ssi/2020/123/made (last accessed 13 April 2021)
[4] United Nations (2015) Paris Agreement. Available at: https://unfccc.int/files/essential_background/convention/application/pdf/english_paris_agreement.pdf (last accessed19 April 2021)
[5] 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).
[6] 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).

target of securing a 100% reduction of greenhouse gas emissions to be reduced by 2050 (compared to 1990 levels).

The HM Government Energy White Paper Powering our Net Zero Future (December 2020)[7]

2.4.5 Following the Prime Minister's 10-point plan for a green revolution and National Infrastructure Strategy (November 2020), the White Paper marks a significant milestone in the UK's net zero transition, setting a net-zero target by 2050 and outlining how this may be achieved. It relates to the generation, supply and use of energy with the drive towards net zero by 2050 at its core, along with energy efficient buildings and lower household bills. It signals a decisive move away from fossil fuel generation and highlights how planned Government investment has the potential to leverage billions more in private sector funding and support over 250,000 jobs in the green economy by 2030.

HM Government Build Back Better Policy Paper (March 2021)[8]

2.4.6 This policy paper reflects the significant economic impact of Covid-19 and the requirement to build our economy back in a way which levels up prosperity and opportunity through appropriate investment. A key element is the delivery of the 10-point plan for a green revolution, leveraging significant private sector investment and supporting up to 250,000 highly-skilled jobs to support the transition to net zero. It aspires for the UK to continue to be at the forefront of tackling climate change and a world leader in clean growth.

Scottish Energy and Climate Change Legislation, Policy and Guidance

2.4.7 Although energy policy is reserved to Westminster, climate change and planning policy is devolved to the Scottish Government and moreover, the UK legislation, policy and guidance recognises the national contributions and separate strategies set out by devolved nations. Accordingly, the Scottish Energy and Climate Change Legislation, Policy and Guidance is a material consideration in the determination of the Section 36 application by Scottish Ministers. The Scottish Government have sought to reflect the suitability of this technology to meet the energy and climate change targets in Scotland, within their national legislation, policy and guidance.

The Scottish Electricity Generation Policy Statement (2013)[9]

2.4.8 The 2013 statement set out the pathway to meeting the Scottish Government target of delivering the equivalent of at least 100% gross electricity consumption from renewables by 2020[10] as part of a wider, balanced energy mix. The main purpose was to seek to

[7] 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)

[8] 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)

[9] 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)

[10] Provisional figures show that the equivalent of 97.4% of gross electricity consumption was made by renewables in 2020. Scottish Government Energy Statistics (March 2021) Available at: https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2018/10/quarterly-energy-statistics-bulletins/documents/energy-statistics-summary---march-2021/energy-statistics-summary---march-2021/govscot%3Adocument/Scotland%2BEnergy%2BStatistics%2BQ4%2B2020.pdf

ensure a secure source of electricity supply at an affordable cost to consumers, which can be largely decarbonised by 2030 and which achieves the greatest possible economic benefit and competitive advantage for Scotland including opportunities for community ownership and community benefits.

Letter of 11 November 2015 from John McNairney to all Heads of Planning in relation to energy targets and SPP[11]

2.4.9 This letter set out the Scottish Government's response in 2015 to the UK Energy Secretary confirming that there is adequate onshore wind to meet the 11-13 Gigawatt (GW) requirement for electricity from onshore wind by 2020. The letter confirms that the Scottish Planning Policy ('SPP') 2014 and the Electricity Generation Policy Statement (2013) set out Scottish Government position. This position was outlined as:

"The Scottish Government target is to generate at least the equivalent of 100% of gross electricity consumption from renewables by 2020. The Electricity Generation Policy Statement is clear that this target is a statement of intent and that it is known Scotland has the potential resource to deliver and exceed it.

Scottish Planning Policy on delivering heat and electricity is clear that the planning system should support the transformational change to a low carbon economy, consistent with national objectives and targets, including the 100% target mentioned above. This does not place a cap on the support for renewable energy developments, including on-shore wind once the target has been reached".

The Scottish Government: Scottish Energy Strategy (December 2017)[12]

2.4.10 As well as previous energy and climate change targets this strategy set two new targets for the Scottish Energy system by 2030 to meet emission reduction targets. These targets were:

- The equivalent of 50% of the energy for Scotland's Heat, transport and electricity consumption to be supplied from renewable sources; and
- An increase by 30% in the productivity of energy use across the Scottish economy.

2.4.11 The strategy confirmed a vision underpinned by three core principles:

- A whole system view which included heat and transport alongside electricity and energy efficiency into Energy policy;
- An inclusive energy transition which tackles inequality and poverty and promotes a fair and inclusive job market, seeking to support consumers to reduce energy bills whilst reducing their carbon footprint and secure reduced costs for Scottish Business to ensure competitiveness; and
- A smarter local energy model which secures coordinated energy systems to plan and deploy energy on an area-by area basis.

[11] 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)

[12] 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)

The Scottish Government: Onshore Wind Policy Statement (December 2017)[13]

2.4.12 This 2017 Policy Statement seeks to outline the ongoing benefits of onshore wind for Scotland stating:

"There is no question that onshore wind is a vital component of the huge industrial opportunity that renewables more generally creates for Scotland. The sector supports an estimated 7,500 jobs in Scotland, or 58% of the total for onshore wind across the UK, and generated more than £3 billion in turnover in 2015".

2.4.13 It further advises that:

"onshore wind will continue to play a vital role in Scotland's future - helping to decarbonise our electricity supply, heat and transport systems, thereby boosting our economy and meeting local and national demand."

The Scottish Government: Climate Change Plan (February 2018)[14]

2.4.14 This 2018 Climate Change Plan sets out the ambition of Scottish Government plans to decarbonise to 2032, confirming within the Ministerial foreword that:

"our ambitions must live up to the scale of the challenge, and our actions must live up to our ambitions."

2.4.15 It confirms that the plan seeks to build on Scotland's success in sectors such as renewable energy to secure further transformational change. The plan sets a target to deliver 50% of all Scotland's energy needs from renewables by 2030, with a target of 100% of electricity to be generated by renewables by 2020[15]. It confirms that amongst other measures this will require ongoing support throughout government policy to increase the amount of electricity generated from renewable sources in Scotland to achieve the requirement of installed capacity of between 12GW and 17GW of renewable electricity generation by 2030.

The Climate Change (Emissions Reduction Targets) (Scotland) Act 2019[16]

2.4.16 Following the announcement of a climate emergency by Scottish Government, this Act introduces further targets than those of the preceding Climate Change (Scotland) Act 2009, seeking to commit to become a net-zero society by 2045 and sets interim targets of:

- At least 56% lower than baseline by 2020[17];

[13] 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)

[14] Scottish Government (2018): Climate Change Plan: Third Report on proposals and policies.

[15] Provisional figures show that the equivalent of 97.4% of gross electricity consumption was made by renewables in 2020. Scottish Government Energy Statistics (March 2021) Available at: https://www.gov.scot/binaries/content/documents/govscot/publications/statistics/2018/10/quarterly-energy-statistics-bulletins/documents/energy-statistics-summary---march-2021/energy-statistics-summary---march-2021/govscot%3Adocument/Scotland%2BEnergy%2BStatistics%2BQ4%2B2020.pdf

[16] 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)

[17] The impact of the lockdown means that the 2020 target will almost certainly be met (to be confirmed in summer 2022) but the key structural changes that will drive emissions reductions in sectors outside of electricity generation have not yet been achieved. Scottish Government Progress Report to Parliament: Reducing Emission in Scotland (October 2020) Available at: https://www.theccc.org.uk/wp-content/uploads/2020/10/Reducing-emissions-in-Scotland-Progress-Report-to-Parliament-FINAL.pdf

- At least 75% lower than baseline by 2030; and
- At least 90% lower than baseline by 2040.

Scotland's Climate Change Plan (2020)[18]

2.4.17 This Climate Change plan update confirms how Scotland will achieve the new emissions reduction targets to 2032 and outlines the requirement to secure a green recovery from Covid-19 that requires a co-ordinated collaborative approach to achieve net zero targets. The plan sets out a pathway to deliver the ambitious climate change targets and confirms that the policies mean that by 2032 there will a substantial increase in renewable generation, particularly onshore wind capacity and a need to invest in onshore electricity. It also confirms the requirement for adoption of electricity based solutions for heat and transport, to take advantage of the large potential for growth of onshore wind capacity in Scotland.

Scotland's Energy Strategy Position Statement March 2021

2.4.18 The Statement sets out how the Scottish Government intends to build upon the recent Programme for Government to focus on addressing climate change and recovering from the economic crisis brought about by Covid-19. It recognises the achievement of Scotland in reaching a 50% reduction (from 1990) of greenhouse gas emissions. It follows the recent Climate Change Plan Update which sets out the pathway to 2032 targets and includes policies further to the 2018 Climate Change Plan. It also sets out the pathway toward net zero ahead of the UN Framework Convention on Climate Change Conference of the Parties ('COP26'). It notes the requirement for a refresh of the Onshore Wind Policy Statement ahead of COP26.

2.4.19 It emphasises the continued commitment to supporting onshore renewables in the right places to help meet net zero targets, stating that the continued growth of Scotland's renewable energy industry is fundamental to enabling us to achieve out ambition of creating sustainable jobs as we transition to net zero.

National Planning Policy and Guidance

National Planning Framework 3[19]

2.4.20 National Planning Framework 3 ('NPF3'), Scottish Government, June 2014 does not form part of the development plan, but does provide the Scottish Governments strategic spatial policy context and strategy for decisions and actions by Scottish Ministers. NPF3 has a requirement for its contents to be reflected by Local Planning Authorities within their local development plans. As such, whilst it has no site specific policies, it does contain general policies which confirm the requirements: to reduce reliance on fossil fuels; and to transition towards a low carbon economy. It recognises that whilst there is a need to protect and sustain our environmental assets; that onshore wind development can improve the long-term resilience of rural communities (paragraph 3.7). It confirms

[18] 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)

[19] Scottish Government (2014) National Planning Framework 3. Available online at: https://www.gov.scot/publications/national-planning-framework-3/ (last accessed 19 April 2021)

that energy has a continued role in securing this transition to a low carbon economy (paragraph 3.23), as it continues to make a significant contribution to the diversification of Scotland's energy supply.

Fourth National Planning Framework: Position Statement

2.4.21 The Fourth National Planning Framework ('NPF4) 'Positions Statement[20] was published to provide an indication of the Scottish Government's current thinking on issues to be addressed by the emerging NPF4. It is not a policy document, but a consultation was undertaken on the document to inform the development of NPF4, which once published will become part of the Development Plan. It confirms the necessary shift required to achieve net zero-emissions by 2045. It identifies key opportunity 8 as requiring support for renewable energy, including extensions of existing wind farms and states:

"we will have to rebalance the planning system so that climate change is a guiding principle for all plans and decisions. We will need to focus our efforts on actively encouraging all developments that help to reduce emission."

2.4.22 Moreover, the emerging NPF4 confirms it will build on the Climate Change Plan, advice from the UK Climate Change Committee and recommendations of the Just Transition Commission and result in actively facilitating decarbonised heating and electricity generation and distribution and states:

"We expect that NPF4 will confirm our view that the Global Climate Emergency should be a material consideration in considering applications for appropriately located renewable energy developments."

2.4.23 It advises that there are a number of potential policy changes which will be introduced through NPF4 which includes:

- Strengthening support for expanding existing wind farms; and
- Upgrading the spatial framework for onshore wind to protect National Parks and National Scenic Areas, allowing development elsewhere subject to site specific assessment.

Scottish Planning Policy[21]

2.4.24 Scottish Planning Policy ('SPP') 2014 (revised December 2020) sets out national planning policies, which reflect Scottish Government Ministers' priorities for the operation of the planning system and for the development and use of land. The SPP is a statement of Scottish Government policy on how nationally important land use planning matters should be addressed.

2.4.25 Paragraph (iii) states that as a statement of Ministers' priorities, the content of the SPP is a material consideration that carries significant weight, although it is for the decision maker to determine the appropriate weight to be afforded to it in each case.

2.4.26 The SPP identifies four key Planning outcomes for Scotland:

[20] Scottish Government (2020) Forth National Planning Framework: Position Statement. Available online at: https://www.gov.scot/publications/scotlands-fourth-national-planning-framework-position-statement/ (last accessed 23 April 2021)
[21] Scottish Government (2020) Scottish Planning Policy. Available online at: https://www.gov.scot/publications/scottish-planning-policy/ (last accessed 19 April 2021)

- A successful sustainable place – supporting economic growth, regeneration and the creation of well-designed places;
- A low carbon place – reducing our carbon emissions and adapting to climate change;
- A natural resilient place – helping to protect and enhance our natural cultural assets and facilitating their sustainable use; and
- A connected place – supporting better transport and digital connectivity.

2.4.27 Paragraph 17 confirms that to achieve a low carbon economy, NPF3 will facilitate the transition to a low carbon economy, particularly by diversification of the energy sector and including a spatial strategy which as a whole aims to reduce greenhouse gases and facilitate adaption to climate change. Paragraph 18 advises that the relevant targets for reducing emissions are set out within the Climate Change (Scotland) Act 2009 (although it should be noted that these targets have now been superseded by more recent targets above which seek to deliver net zero carbon emissions in Scotland by 2045). Paragraph 19 confirms that it is the role of SPP to set out how this should be delivered on the ground by the planning system to secure the transformational change required.

2.4.28 SPP contains two Principal Policies on 'sustainability' and 'placemaking' and the criteria against which the Proposed Development is to be assessed is contained within Section 3 Assessment.

2.4.29 With regard to Sustainability the Policy Principle on Page 9 states:

"The SPP introduces a presumption in favour of sustainable development"

2.4.30 Paragraph 29 advises that planning policies and decision should support sustainable development and therefore, to assess sustainability, the following principles relevant to the Proposed Development must be taken into account:

- giving due weight to net economic benefit;
- responding to economic issues, challenges and opportunities, as outlined in local economic strategy;
- supporting good design and the six qualities of successful places;
- making efficient use of existing capacities of land, buildings and infrastructure;
- supporting delivery of accessible business;
- supporting delivery of infrastructure including energy;
- supporting climate change mitigation and adaptation including taking account of flood risk;
- Improving health and well-being by offering opportunities for social interaction and physical activity including sport and recreation;
- having regard to the principles of sustainable land use set out in the Land Use Strategy;
- protecting, enhancing and promoting access to cultural heritage, including the historic environment;
- protecting, enhancing and promoting access to natural heritage, including green infrastructure, landscape and the wider environment;
- reducing waste, facilitating its management and promoting resource recovery; and

- avoiding over-development, protecting the amenity of new and existing development and considering the implications of development for water, air and soil quality.

2.4.31 With regard to delivery, paragraph 30 confirms that development plans should be consistent with SPP, including a presumption in favour of sustainable development and be up-to-date, place-based and enabling with a spatial strategy that is complemented through policies and proposals.

2.4.32 Placemaking is addressed from paragraph 36 and confirms that high quality places should be promoted by taking a design-led approach. It also requires a sustainable pattern of development, which optimises the use of existing resource capacities. For energy generation, it advocates locating development where it delivers the greatest benefit for the amenity of local people and the vitality of the local economy.

2.4.33 In the promotion of Rural Development, paragraph 75 confirms that the planning system should promote a pattern of development that is appropriate to the character of the particular rural area. It encourages rural development that supports prosperous and sustainable communities and business, whilst protecting and enhancing environmental quality. Paragraph 77 also confirms that:

"In remote and fragile areas and island areas outwith defined small towns, the emphasis should be on maintaining and growing communities by encouraging development that provides suitable sustainable economic activity, while preserving important environmental assets such as landscape and wildlife habitats that underpin continuing tourism visits and quality of place".

2.4.34 Further advice which is relevant to the Proposed Development, relating to remote rural areas is provided in paragraph 83 which states that:

"where development can help sustain fragile communities, plans and decision making should generally:

- *Encourage sustainable development that will provide employment; and*
- *support and sustain fragile and dispersed communities through provision for appropriate development, especially housing and community-owned energy".*

2.4.35 Under Supporting Business and Employment, paragraph 94 confirms that plans should align with local economic strategies to help meet the needs and opportunities of indigenous firms and inward investors and recognising the potential of key sectors which includes energy.

2.4.36 SPP addresses 'A Low Carbon Place' as a 'subject policy' on page 36 and refers to 'delivering electricity'. Paragraph 152 refers to the NPF3 context and states that NPF3 is clear that planning must facilitate the transition to a low carbon economy and help to deliver the aims of the Scottish Government.

2.4.37 Paragraph 153 also recognises that planning can facilitate the development of renewable energy technologies, advising:

"Efficient supply of low carbon and low cost heat and generation of heat and electricity from renewable energy sources are vital to reducing greenhouse gas emissions and can create significant opportunities for communities. Renewable energy also presents a significant opportunity for associated development, investment and growth of the supply chain, particularly for ports and harbours identified in the National Renewables

Infrastructure Plan. Communities can also gain new opportunities from increased local ownership and associated benefits".

2.4.38 In terms of 'Policy Principles', paragraph 154 states that the planning system should:

- support the transformational change to a low carbon economy, consistent with national objectives and targets, including deriving: 30% of overall energy demand from renewable sources by 2020; 11% of heat demand from renewable sources by 2020; and the equivalent of 100% of electricity demand from renewable sources by 2020;
- support the development of a diverse range of electricity generation from renewable technologies – including the expansion of renewable energy generation capacity; and
- guide development to appropriate locations and advise on the issues that will be taken into account when specific proposals are being assessed.

2.4.39 Paragraph 155 confirms that development plans should:

"ensure an area's full potential for electricity and heat from renewable sources is achieved, in line with national climate change targets, giving due regard to relevant environmental, community and cumulative impact considerations".

2.4.40 Paragraphs 161-166 are specifically relevant to onshore wind, requiring local development plans to establish a spatial framework to provide a locational guide to assist in the location of, and decision making process for onshore wind energy proposals. SPP advises that spatial frameworks provided as part of Local Development Plans are expected to follow the approach set out in SPP Table 1. This table categorises all areas into three groups which provides an indicating of the likely acceptability of a location in principle ranging from the highest level of protection in Group 1 reducing to Group 3. The Site falls within group 2: 'areas of significant protection' due to the location of the Site in relation to Wild Land and the potential for deep peat, which highlight that development may be appropriate in some circumstances where it can be demonstrated that significant effects can be substantially overcome by siting, design, or other mitigation.

2.4.41 Paragraph 169 sets out considerations which may be relevant for proposals for windfarms which are set out including an assessment within Chapter 3.

2.4.42 Paragraph 170 confirms that areas identified for wind farms should be suitable for use in perpetuity and whilst consents may be time-limited the key considerations to reduce impacts and protect an acceptable level of amenity for adjacent communities should help realise the potential for continued use of suitable wind farm sites. As an extension to the existing Achany Wind Farm, the adjacent area has been deemed as suitable for wind farm development having taken account of these key considerations and therefore should be deemed as suitable for use in perpetuity.

2.4.43 SPP Paragraph 174 relates to existing wind farm sites and whilst it does not specifically mention extension, recognises that repowering (which can involve new design and layout) on suitable sites can:

"help to maintain or enhance installed capacity, underpinning renewable energy targets. The current use of the site as a wind farm will be a material consideration in any such proposals."

2.4.44 Under the Policy for A Natural, Resilient Place SPP confirms in paragraph 193 that:

"the planning system should protect, enhance and promote access to our key environmental resources, whilst supporting their sustainable use".

2.4.45 The SPP confirms that development plans should identify and afford appropriate levels of protection to international, national and locally designated areas and sites, explaining their reason for local designation including their function and continuing relevant. It confirms that buffer zones should not be established around areas designated for their natural heritage importance and that the level of protection given to local designations should not be as high as that given to international or national designation. It also encourages limits on non-statutory local designations in accordance with the list provided in Paragraph 197 relating to local landscape or local nature conservation value.

2.4.46 Paragraph 200 specifically relates to Wild Land Character advising that this relates to remoter upland, mountain and coastal areas which are sensitive to any form of intrusive human activity or have little or no capacity to accept new development. It confirms that plans should:

"identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas".

2.4.47 Furthermore, paragraph 215 confirms that:

In areas of wild land, development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation".

2.4.48 Paragraph 202 advises that development should be sited and designed to take account of local landscape character and decisions should take account of potential effects on landscape and the natural and water environment, including cumulative effects. It states that developers should seek to minimise impacts through careful planning and design, considering services the natural environment provides and maximising the potential for enhancement.

2.4.49 In the determination of planning applications, paragraph 203 advises that permission should be refused where the nature or scale would have an unacceptable impact on the natural environment, but confirms that:

"whilst effects are an important consideration, designation does not impose an automatic prohibition on development. The precautionary principle should not be used to impede development without justification."

2.4.50 With regard to development where peat and other carbon rich sources are present, applicants are required by paragraph 205 to assess the likely effects of the development on carbon dioxide emissions and aim to minimise the release into the atmosphere.

Relevant National Planning Guidance

2.4.51 The following national planning guidance is also considered to be relevant in relation to onshore wind and the guidance has been taken into account in the preparation of the EIA Report:

- The Scottish Government (online): Onshore wind turbines guidance (updated May 2014)[22];
- The Scottish Government: Onshore Wind – some questions answered (December 2016[23]);
- SNH: Spatial planning for onshore wind turbines – natural heritage considerations: guidance (June 2015)[24]; and
- The Scottish Government: Good practice principles for shared ownership of renewable energy developments (September 2015)[25].

The Development Plan

2.4.52 The development plan comprises the Highland-wide Local Development Plan, April 2012[26] ('HWLDP') and the Caithness and Sutherland Local Development Plan, adopted in 2018[27] ('CaSPlan'). A summary of the key strategies, policies, aims and objectives of the development plan as considered by the EIA are undernoted.

2.4.53 Further documents which have been approved as part of the statutory development plan includes:

- the Onshore Wind Energy Supplementary Guidance (adopted November 2016) including the Addendum Supplementary Guidance (adopted December 2017)[28].

Highland-wide Local Development Plan 2012

2.4.54 Approved by Scottish Ministers, the HWLDP came into force in April 2012, setting out broad strategic themes within its vision statement which seek to guide and inform Development in the Highland local administrative area until 2030. Those potentially relevant to the Proposed Development include:

- *"Safeguard the environment – ensuring renewable energy resources are managed with clear guidance on their location and protecting and enhancing the natural, built and cultural environment; lead in the reduction of greenhouse gases released into the air, adapted to the effects of climate change and limited non-renewable*

[22] Scottish Government (2014) Onshore Wind Turbines: planning advice (online). Available online at: https://www.gov.scot/publications/onshore-wind-turbines-planning-advice/ (last accessed 19 April 2021)
[23] Scottish Government 2016: Factsheet: Onshore Wind Planning: Frequently Asked Questions. Available at: https://www.gov.scot/publications/onshore-wind-planning-faq/ (last accessed)
[24] Scottish Natural Heritage (Now Nature Scot) 2015 Spatial Planning for Onshore Wind Turbines – natural heritage considerations guidance. Available online at: https://www.nature.scot/sites/default/files/2019-10/Guidance%20-%20Spatial%20Planning%20for%20Onshore%20Wind%20Turbines%20-%20natural%20heritage%20considerations%20-%20June%202015.pdf (last accessed 19 April 2021)
[25] Scottish Government (2015): Good Practice Principles for Shared Ownership of Onshore Renewable Energy Development. Available online at: https://www.gov.scot/publications/scottish-government-good-practice-principles-shared-ownership-onshore-renewable-energy-developments/ (last accessed 19 April 2021)
[26] The Highland Council (2012) The Highland Wide Local Development Plan. Available at: https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/199/highland-wide_local_development_plan (last accessed 19 April 2021)
[27] The Highland Council (2018) The Caithness and Sutherland Local Development Plan. Available online at: https://www.highland.gov.uk/info/178/local_and_statutory_development_plans/283/caithness_and_sutherland_local_development_plan (last accessed 19 April 2021)
[28] The Highland Council (2016 and 2017) Onshore Wind Energy Supplementary Guidance and Addendum. Available at: https://www.highland.gov.uk/directory_record/712079/onshore_wind_energy(last accessed 19 April 2021)

resources development uses; and lead in the delivery of sustainable waste management;

- *Support a competitive, sustainable and adaptable Highland economy by: providing opportunities for economic development and new employment across the area focusing on key sectors including energy to grow the economy over the long-term and ensure there is guidance for the protection of key resources; and*
- *Provide a better opportunity for all and a fairer Highland through promotion of investment in services and infrastructure and opportunities for investment and diversification in the economy".*

2.4.55 HWLDP also contains a number of general policies. Full copies are provided in Technical Appendix 6.1: HWLDP Policies. A summary of the policies, as potentially relevant to the Proposed Development are set out in Table 3.1 within Chapter 3 - Assessment.

Caithness and Sutherland Local Development Plan 2018

2.4.56 The CaSPlan provides a vision, strategy and policies and subsequently provides settlement statements and allocations. There are no general policies which are considered to be relevant to the Proposed Development. The relevant strategy includes the intention to grow the communities, employment, connectivity and transport, and Environment and Heritage. This includes an economic strategy which recognises the benefits of renewable energy in achieving national climate change targets, but also in delivering economic benefit for the area. It also notes the role of the area as a renowned location for renewable energy, stating its desire for the strategy outcome is:

"A strong, diverse and sustainable economy characterised as being an internationally renowned centre for renewable energy".

2.4.57 It sets out a strategy outcome requirement for Environment and Heritage which seeks:

"High quality places where the outstanding environment and natural built and cultural heritage is celebrated and valued assets are safeguarded".

2.4.58 With regard to climate change it confirms a commitment to working with stakeholders including communities, businesses and partners to mitigate the impacts of climate change, reduce greenhouse gas emissions and adapt to respond to climate change, including maximising renewable energy contributions. It recognises the significant renewable energy resources, including the onshore wind sector which is noted as being well established in the area.

Onshore Wind Energy Supplementary Guidance 2016

2.4.59 The Onshore Wind Energy Supplementary Guidance ('OWESG') was adopted in November 2016 and contains an Addendum SG ('Part 2b') which was adopted in December 2017. As adopted Supplementary Guidance, they form part of the development plan.

2.4.60 The requirements and criteria set out within the OWESG is provided in detail alongside an assessment within Chapter 3. In summary, it provides details of the matters which THC will take into account when determining applications for onshore wind, including where they are a statutory consultee to Scottish Government on Section 36 applications. This includes a spatial framework for onshore wind energy (May 2020) which is relevant to the Proposed Development as it relates to more than one turbine over the height of 30 metres to blade tip. It confirms that the Site falls within Group 2: Areas of Significant

Protection, which relates to the Areas of Search identified by SPP. It also provides, within Section 4, key development plan considerations which expand upon the HWLDP policies on a range of matters including:

- Siting and Design;
- Landscape and Visual Effects;
- Safety and Amenity;
- Safety of Airports, Defence and Emergency Services;
- Operational Efficiency of Other Communications;
- The Natural and Historic Environment;
- The Water Environment;
- Peat;
- Trees and Woodland;
- Tourism and Recreation;
- Public Access;
- Traffic and Transport;
- Electricity and Gas Infrastructure;
- Noise;
- Borrow Pits; and
- Mitigation/CEMP/Restoration bonds.

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 EIAR which confirms that the Electricity Act requirements have been addressed as the significant Design Evolution as detailed in EIAR Chapter 2: Site Selection and Design Evolution 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 includes design iterations and workshops with the consultant team to minimise effects on sensitive habitats, avoiding deeper peat and giving consideration to other environmental factors for example on ornithology and maintaining appropriate buffer distances from sensitive receptors such as watercourses. Furthermore, detailed design was informed to address Landscape and Visual effects, as summarised in Section 1.4 of this statement which included, in summary:

- The design iterations resulted in the turbine footprint being pushed as far south as possible, to the periphery of the WLA to minimise the extent and range of intervisibility and maximise the distance between the proposed turbines and the Central Core and the north of the 'Western Lobster Claw' where the greatest extent of higher wildness is considered to be present.
- The retention of the turbines at the southern tip of the WLA is also considered to create a closer connection with the existing Achany and Rosehall wind farms which already lead to a clear limit to the extent of the WLA in this area, and ensures that virtually all parts of the WLA, other than the area directly affected and a small area to the east of the turbines, would retain the connection to the greater body of the WLA to north and west.
- The development of the turbine layout has aimed to minimise the presence of turbines on higher ground and maintain a cohesive grouping of turbines to minimise the visual envelope of the Proposed Development across the WLA as far as possible and the appearance of turbine spread or outlier turbines.
- The height of the proposed turbine has been reduced to under 150m in order to avoid the effects of visible aviation lighting on the WLA.
- The use of existing infrastructure has been considered where possible, to minimise the need for new tracks to be built.
- The location of tracks and permanent ancillary features such as the substation and welfare facilities has been given careful consideration in relation to the topography of the site, to minimise their visual extent.
- A high standard of reinstatement is proposed for temporary areas and borrow pits as described in the Outline Construction Environmental Management Plan (Technical Appendix 3.1) and the Design Statement (Technical Appendix 2.1), and would be implemented and monitored to ensure success as detailed in the Outline Habitat Management Plan (Technical Appendix 8.10).

3.1.2 The Proposed Development is further supplemented by EIAR Chapter 18 Schedule of Mitigation, which 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.

3.1.3 The EIAR has 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 has also identified a moderate significant effect on Dail Langwell Scheduled Monument. However, the Chapter concludes 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 Proposed Development, therefore there would not be an adverse effect upon the integrity of the asset's setting.

3.1.4 Whilst other effects have been identified by the EIA, with appropriate mitigation, the residual effects are not considered to be significant.

3.1.5 The overall effects are addressed in detail within the EIAR and an assessment of the effects under the range of development plan policies is contained in Table 3.1 later in this chapter.

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

3.2.1 Chapter 2 identifies the International, UK and Scottish Government legislation and policy including targets to achieve an equivalent of 50% of demand for electricity from renewable sources by 2030 and to secure complete decarbonisation by 2050. Chapter 14 of the EIAR confirms the direct contribution that the development can make towards the Scottish Governments renewable energy targets. As an extension to the existing Achany Wind Farm, the Proposed Development would:

- Deliver installed capacity in excess of 80MW;
- Deliver a combined capacity in excess of 118MW with the existing Achany Wind Farm;
- Secure a reduction in carbon dioxide through provision of electricity from a renewable resource to replace fossil fuel generation;
- 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 Whilst NPF3 contains no site specific policies against which the Proposed Development is to be assessed, it does contain general policies which confirm the requirements: to reduce reliance on fossil fuels; and to transition towards a low carbon economy. In this respect the Proposed Development is considered to make a direct contribution to meeting these aims whilst making every effort, as demonstrated within the EIAR, to limit the environmental effects and promote the most suitable development for the site. The Proposed Development helps improve the long-term resilience of rural communities, as demonstrated in Chapter 14 Socioeconomic Recreation and Tourism and helps the

transition to a low carbon economy as required by NPF3, paragraph 3.23, and makes a contribution to the diversification of Scotland's energy supply.

3.3.2 **Compliance: The Proposed Development complies with and gains support from NPF3.**

Emerging NPF4

3.3.3 Whilst the forthcoming NPF4 has not been published, a consultation has been undertaken and, once approved, it will form part of the Development Plan. Sections 2.4.39 – 2.4.41 of this Statement confirm the direction that the new NPF4 will take and which will become part of the development plan. The key aims are for additional support for extensions to existing wind farms, to redress the balance in favour to ensure that climate change is a guiding principle for all decisions and the need to focus on actively encouraging all developments which help reduce emissions, clearly demonstrating the will of the Scottish Government to address climate change. Furthermore, it confirms that it is expected that NPF4 will make the Global Climate Emergency a material consideration in the determination of applications. It specifically confirms that there is a need to upgrade the spatial framework to protect National Parks and National Scenic Areas and enable development elsewhere subject to site specific assessment.

3.3.4 The Proposed Development addresses and gains significant support from the proposed aspirations of the Scottish Government in the emerging NPF4. Whilst in the future it would appear that the emerging NPF4 will directly support suitable developments such as the Proposed Development, the unfortunate delay to the publication of the document due to Covid-19 means the refreshed and renewed strategic directions therein are not final. The Draft NPF4 is anticipated to be published in autumn 2021.

Scottish Planning Policy

3.3.5 The SPP outlines the requirement for development to meet renewable energy targets, which the Proposed Development would help contribute towards. The SPP outlines a presumption in favour of Sustainable Development. The EIA Report demonstrates the suitability of the proposal in protecting the environment whilst delivering a suitable, sustainable energy development, which will contribute to Scotland's economic growth.

3.3.6 SPP sets out a number of detailed requirements to ensure developments are sustainable (as detailed in Section 2.4.48 of this Statement) which need to be addressed by wind farm developments. These requirements have been addressed by the preparation of the supporting EIAR and each of the matters are addressed under the Development Plan Assessment contained in Table 3.1 below.

3.3.7 The SPP provides spatial guidance for the local of wind farms and the site is located within Group 2 Area of Significant Protection, however allocation under this group enables development where the suitability of the site has been demonstrated and it is contended that the findings of the EIAR support the Applicant's view that this represents a suitable site for the extension of the existing Achany Wind Farm, with only limited and localised effects which are addressed in greater detail in the Development Plan Assessment contained in Table 3.1.

3.3.8 The limited effects of the Proposed Development identified by the EIAR on the local area including a small section of Wild Land Area 34 Reay – Cassley nonetheless demonstrates compliance with SPP which states:

"In areas of wild land, development may be appropriate in some circumstances. Further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation".

3.3.9 The detailed design iteration undertaken by the Applicant and consultant team as detailed in Chapter 2: Site Selection and Design Evolution of the EIAR clearly demonstrates how the significant effects have been substantially overcome by siting, design and other mitigation, in this case by embedded design mitigation.

3.3.10 **Compliance: The Proposed Development is considered to comply and gain significant support by Scottish Planning Policy 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 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 an assessment of compliance of the Proposed Development against those policies.

Table 3.1: HWLDP Policies and assessment of Compliance

Policy Number/Title	Policy Summary	Assessment
Policy 28 Sustainable Development	This policy confirms the Council will support developments which promote and enhance the social, economic and environmental wellbeing of the people of Highland, advising proposed developments will be assessed on a range of criteria which protect and ensure sustainable use of existing and future infrastructure, built and natural resources and residential amenity. The policy advises that where it is considered to be significant due to its nature, size or location, it will only be supported if no reasonable alternatives exist and where there is over-riding strategic benefit or satisfactory mitigating measures are incorporated. Policy 28 requires that all development proposals must demonstrate compatibility with the Sustainable Design Guide: Supplementary Guidance, which requires that all developments should: • conserve and enhance the character of the Highland area; • use resources efficiently; • minimise the environmental impact of development; and • enhance the viability of Highland communities.	This is a general policy which applies to all development. The policy requirements to promote and enhance social, economic and the environmental wellbeing which ensures the sustainable use of existing and future infrastructure, built and natural resource has been addressed by the Applicant through the preparation of an EIAR which confirms how each of these matters has been fully addressed. Chapter 2 Site Selection and Design Evolution of the EIAR and EIAR Technical Appendix 2.1 confirms how the Proposed Development has been designed to minimise environmental impacts of the development, whilst making the most of the site's excellent wind resource and utlising existing infrastructure wherever possible from the existing Achany Wind Farm to reduce overall impacts of the development. With regard to the policy aim to conserve and enhance the character of the Highlands Area, Chapter 2 confirms the measures undertaken through the design evolution to limit the effects on the character of the area and this is discussed in detail under the asssessment of Policy 61 Landscape. Chapter 14: Socioeconomic Recreation and Tourism of the EIAR also sets out the benefits of the Proposed Development to enhance the viability of Highland communities. These matters are discussed in greater detail under Policy 67. **Compliance: The Proposed Development is considered to be compliant with the requriements of Policy 28.**
Policy 29 Design Quality and Place-making	Development is required to make a positive contribution to the architectural and visual quality of the place where it is located, demonstrating sensitivity and respect towards the local	This is a general policy relevant to all development. Notwithstanding this, Chapter 2 Site Selection and Design Evolution of the EIAR and EIAR Technical Appendix 2.1 provides details of the detailed design iteration process which confirms the evolution of the detailed design. This confirms how it responded to the requirement to ensure an appropriately designed layout for the Proposed Development which minimises environmental effects, particularly lanscape and visual effects. The

Policy Number/Title	Policy Summary	Assessment
	distinctiveness of the landscape architecture, design and layout.	final design developed through the EIA process shows sensitivity and respect to the visual quality of the place. This is discussed in greater detail under the assessment of Policy 61 Landscape and Policy 67 Renewable Energy Developments. **Compliance: The Proposal is considered to be compliant with Policy 29.**
Policy 30 Physical Constraints	Developers must consider if the development is in an area of constraints, set out in 'Physical Constraints: Supplementary Guidance' and must demonstrate compatibility with the constraint or confirm suitable mitigation. The list of Physical Constraints required to be considered are set out in Technical Appendix 6.2: THC Supplementary Guidance.	The EIAR was prepared in full cognisance of the phyiscal constraints and the EIAR has confirmed how the Proposed Development ensures compatibility, either through embedded design or through mitigation measures which include buffer zones and measures to be outlined within a CEMP, a draft of which is provided as EIAR Technical Appendix 3.1. EIAR Chapter 2 Site Selection and Design Evolution and EIAR Technical Appendix 2.1 also provides the detailed justification of the design evolution process, to take account the physical constraints in order to promote the optimal design solution for the Proposed Development. **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.**
Policy 31 Developer Contributions	This policy advises that the Council may seek fair and reasonable contributions in cash or kind to address costs, which are created by the development, secured through a Section 75 obligation or other legal agreement.	The Applicant is familiar with The Highland Council's Policy 31 regarding Developer Contributions and will engage with the Council on the appropriate means for securing same (for example s96 Roads Bond). **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.**
Policy 36 Development in the Wider Countryside	Outside the defined settlements, the Proposed Development will be assessed against the following key considerations: • siting and design; • addressing existing patterns of development; • being compatible with the landscape character and capacity;	This is a general policy relevant to all development in the wider countryside, it confirms that onshore wind will instead be considered under Policy 67 which is more specific to renewable energy development in the Countryside. A detailed assessment is therefore provided under Policy 67. **Compliance: This policy does not require compliance as assessment for onshore wind will be made under Policy 67**.

Policy Number/Title	Policy Summary	Assessment
	• avoiding expansion of a one particular development type in a landscape whose distinct character relies on a mix of characteristics; • avoiding the loss of croft land; • addressing drainage constraints and can be adequately serviced; and • whether the proposal assists 'Fragile Areas'.	
Policy 51 Trees and Development	This policy provides significant protection to existing hedges, trees and woodlands on and near development sites and requires an appropriate woodland management plan to secure management of existing resources. It also refers to separate Supplementary Guidance 'Trees, Woodland and Development'.	Chpater 8: Ecology of the EIAR confirms that there are adequate buffer distances to any trees or woodlands and has scoped out further assessment as there are not predicted to be any significant effects to Trees or Woodland. **Compliance: The Proposed Development protects trees and woodlands and is compliant with Policy 51.**
Policy 52 Principle of Development in Woodland	This policy requires demonstration of the need to develop a wooded site and that the site can accommodate the development. There is a strong presumption in favour of protecting woodland resources. Development proposals will only be supported where they offer clear and significant public benefit and where woodland removal is required, compensatory planting will be required. Major development will be assessed against their socio-economic impact on the forestry industry, economic maturity of the woodland and the opportunity for the proposal to co-exist with forestry operations. There will be a strong presumption against development on inventoried woodland, designated woodland or other important features. Proposals will	Chapter 8: Ecology of the EIAR confirms that there are adequate buffer distances to any trees or woodlands and has scoped out further assessment as there are not predicted to be any significant effects to Trees or Woodland. **Compliance: The Proposed Development avoids development in and avoids significant effects to Woodland and is therefore compliant with Policy 52.**

Policy Number/Title	Policy Summary	Assessment
	be assessed against Scottish Governments policy on Control of Woodland Removal. The current Highland Forest and Woodland Strategy will be considered as a material consideration.	
Policy 54 Mineral Wastes	The Council will encourage the minimisation and re-use of mineral, construction and demolition wastes. A Waste Management Plan is required to show minimisation, treatment, recovery and disposal of waste.	The EIAR contains a draft CEMP within Technical Appendix 3.1 which details how construction wastes will be managed and how materials will be stored and re-used on site. No significant effects are predicted with regard to mineral waste. **Compliance: The proposal is considered to comply with Policy 54.**
Policy 55 Peat and Soils	The Council will require the Applicant to demonstrate how they have avoided unnecessary disturbance, degradation or erosion of peat and soils. The policy advises that unacceptable disturbance of peat will not be permitted unless adverse effects are clearly outweighed by social, environmental or economic benefits arising from the development proposal. Where it is demonstrated that development on peat is unavoidable then a peatland management plan is to be submitted demonstrating how impacts have been minimised and mitigated. Proposed development must also demonstrate that extraction would not adversely affect the integrity of any nearby Natura sites containing areas of peatland.	Chapter 2: Site Selection and Design Evolution confirms how the design of the site has sought to avoid deep peat, wherever possible. EIAR Technical Appendix 2.1 also confirms that stage 4 of the design evolution process sought to incorporate the findings of peat survey and probing to adjust the final layout to minimise these environmental effects. Chapter 11: Geology and Carbon Balance of the EIAR further confirms that the design and layout of the Proposed Development has ensured it has been optimised to minimise the disturbance of peat by avoiding areas of thick peat deposits where possible and the re-use of peat would be maximised. It confirms that peat deposits are located across most of the site, however extensive peat probing has been carried out and found that it is generally of limited thickness across the site (<1.0m). The potential effects on peat have been assessed and found not to be significant in terms of the EIA Regulations either individually or cumualtively. Furthermore, the EIAR contains Techinical Appendices 11.2 Peat Landslide Hazard and Risk Assessment, 11.3 Peat Management Plan and 11.4 Carbon Calculations which have informed the assessment. Chapter 8: Ecology also provides a detailed assessment of the potential peatland habitat impacts and confirms in Sections 8.6.22 to 8.6.25 that the surveys demonstrated that most of the blanket bog was considered to be modified through grazing and possibly other management practices such as burning. There was one community known as M18 and part of M17a which was closest to Near Natural. Some of the area was also Actively Eroding and Drainage through erosion features. The blanket bog in the study area was considered of intermediate condition with areas of 'bad quality' and small areas of 'good quality' and likely to be largely inactive. The design iteration process informed the siting of WTGs to avoid peatland habitat wherever possible, or where avoidance was not possible, designed to avoid habitats of highest ecological importance and highest sensitivity of effects. Section 8.7.6 of the EIAR confirms that *"The layout of the wind turbines has been designed to ensure that areas of*

Policy Number/Title	Policy Summary	Assessment
		blanket bog vegetation, and in particular, the most sensitive areas of vegetation have been avoided as far as possible. This process has been informed by the NVC survey data, Peatland Condition Assessment (PCA) and Vegetation Survey at turbine locations (EIAR Technical Appendices 8.2A and 8.2B), with preference for development in areas broadly categorised as modified/drained or actively eroding, and upon areas of shallower peat." Through careful design of tracks and crossings, a CEMP (an outline of which is included in EIAR Technical Apendix 3.1) and a Peat Management Plan as well as all other measures for site supervision and management (outlined in EIAR Table 8.11 as embedded mitigation). Without further mitigation a significant effect was predicted by the EIAR, however the proposals to conserve, enhance and restore degraded or modified blanket bog habitat (as per Outline Habitat Managemnet Plan (EIAR Technical Appendix 8.10) mean that the EIAR found that there would be no residual significant effects and likely to contribute to a positive balance to the blanket bog resource within and around the site. The assessment has confirmed that it would not have a significant adverse effect on the integrity of any nearby Natura sites containing areas of peatland and would be controlled through the CEMP, an outline of which is contained in EIAR Technical Appendix 3.1 **Compliance: The Proposed Development is considered to comply with Policy 55.**
Policy 56 Travel	This policy requires details of on and off-site transport implications, those criteria relevant to the proposal advise proposed development's should: • Be well served by the most sustainable modes of travel; • Be designed for the safety and convenience of all potential uses; • Incorporate appropriate mitigation, through developer contribution if necessary, to improve and enhance all transport modes; • Include appropriate parking provision; and	Chapter 13: Traffic and Transport of the EIAR confirms that In line with IEMA guidelines[29], severance, driver delay, pedestrian delay, pedestrian amenity, fear and intimidation as well as accidents and safety have been evaluated for the Proposed Development. Following the implementation of a Construction Traffic Management Plan ('CTMP'), proposed mitigation measures and discussion with stakeholders, the environmental effect is considered to be not significant for the Proposed Development. With regard to Cumualtive Impacts, the EIA process requires assessment of the worst case scenario, which for the purposes of the EIA assessment undertaken assumes that the unlikely event of Lairg 2, Creag Riabhach and Braemore Wind Farms construction programmes take place at the same time as the Proposed Development. In this circumstance the cumulative effects are predicted to be signficant, although temporary and over a short duration. However, an enhanced CTMP would ensure measures could minimise conflict to ensure no signficant residual cumulaltive effects.

[29] Institute of Environmental Assessment (1993). Guidelines for the Environmental Assessment of Road Traffic

Policy Number/Title	Policy Summary	Assessment
	• Green Travel Plans may be required for significant travel generating developments. The Council will also take account of The Core Paths Plan.	Chapter 13 also confirms that there are no Core Paths within the site or in proximity that would be affected by traffic movements associated with the Proposed Development either individually, or cumulatively. **Compliance: The Proposed Development is considered to comply with Policy 56.**
Policy 57 Natural, Built and Cultural Heritage	All development proposals will be assessed taking into account the level of importance and type of heritage features, the form and scale of the development, and any impact on the feature and it's setting. The following criteria will also apply: • Features of local/regional importance – development will be allowed if it can be satisfactorily demonstrated it will not have an unacceptable impact on the natural environment, amenity and heritage resource. • Features of national importance - developments will be allowed if it is shown not to compromise the natural environment, amenity and heritage resource. Significant adverse effects, must be clearly outweighed by social or economic benefits of national importance. It must also be shown that the development will support communities in fragile areas who are having difficulties in keeping their population and services. • Features of international importance - developments likely to have a significant effect on a site, either alone or in combination with other plans or projects, not directly connected with or necessary to the management of the site for nature conservation will be subject to an appropriate assessment. Where the Council is unable to ascertain that a proposal will not adversely affect the integrity of a site, development will only be	EIAR Chapter 2 Site Selection and Design Evolution and associated EIAR Technical Appendix 2.1 provide details of the design evolution process which was undertaken by the Applicant and their consultants to address environmental effects relating to Natural, Built and Cultural Heritage. This included detailed input from a landscape and visual impact perspective to minimise potential landscape and visual effects and subsequently on the basis of detailed environmental survey work and a number of workshops with the consultant team to minimise other environmental effects. This included careful location of the turbines and associated infrastructure and a review of the apporpriate maximum height of the turbines to avoid visible turbine lighting. The conclusions of Chapter 7 Landscape and Visual Amenity and associated Technical Appendices (including 7.11 the assessment against OWESG) is addressed in detail under Policy 61 and 67 and found to comply with the requirements to consider natural, built and cultural heritage. Chapter 8: Ecology of the EIAR provides a detailed assessment as it relates to Ecology including statutory and non-statutory (non-avian) designations within 10km of the Proposed Development. It includes embedded mitigation measures (as detailed within Table 8.11, Chapter 8 of the EIAR). Further Mitigation is provided in Section 8.9 of the EIAR, including a Compensatory Habitat Restoration and Deer Management Plan, which are Technical Appendices 8.10 and 8.9 respectively. Chapter 8 concludes that, with the embedded and additional mitigation proposed, that there are no significant effects predicted. Chapter 9: Ornithology of the EIAR advises that on the basis of assessment that there would be no significant effects on any Important Ornithological Features ('IOFs') and no adverse effects of the integrity of any designated sites, either individually or cumulatively. Chapter 10: Hydrology of the EIAR confirms that no significant effects are predicted on Ground Water Dependent Terrestrial Ecosystems. Chapter 12 Cultural Heritage addresses archaeology and cultural heritage assets and confirms that the iterative design process has secured mitigation of effects through design, such that only one moderate signficant effect is predicted to Dail Langwell Broch (Asset 45), a scheduled monument. Chapter 12 confirms that " *The design has considered the presence and setting of the Scheduled Dail*

Policy Number/Title	Policy Summary	Assessment
	allowed where there is no alternative solution and there are imperative reasons of overriding public interest, including those of a social or economic nature. Where a priority habitat or species (as defined in Annex 1 of the Habitats Directive) would be affected, development in such circumstances will only be allowed if the reasons for overriding public interest relate to human health, public safety, beneficial consequences of primary importance for the environment, or other reasons subject to the opinion of the European Commission (via Scottish Ministers). Where it is not ascertained if the proposal will adversely affect the integrity of a site, the proposal will not be in accordance with the development plan (within the meaning of Section 25(1) of the Town and Country Planning (Scotland) Act 1997). The policy refers to Supplementary Guidance (January 2013) Highland Historic Environment Strategy.	*Langwell Broch (Asset 45) and sought to reduce impacts upon the setting of it, particularly by limiting the number of turbines that can be seen from within the glen and by moving turbines south towards the existing Achany Wind Farm. When compared with the previous 2012 Glencassley application this has reduced the effect upon the setting of the broch by limiting the views from the broch in which turbines would be seen and by moving the majority of turbines behind the ridgeline which marks the eastern extent of the glen."* Therefore, whilst a moderate significant effect has been predicted, the Chapter concludes that as it retains the key relationships with the River Cassley and glen remaining appreciable and the ability to understand its defensive position means it is not dimished by the Proposed Development and therefore there would not be an adverse effect upon the integrity of the assset's setting. On the basis of the iterative design proceess which was undertaken to protect designated assets, taking account of the site individually and cumulatively, no significant cumulative effects on archaeology or cultural heritage have been identified. **Compliance: The Proposed Development is considered to comply with the requirements of Policy 57.**
Policy 58 Protected Species	This policy requires that where a protected species may be present on-site, or may be affected, a survey is required to establish its presence and the necessary mitigation to avoid or minimise any impacts on the species, before determining the application. Development that is likely to have an adverse effect, individually and/or cumulatively, on European Protected Species will only be permitted where: • there is no satisfactory alternative; • the development is required for preserving public health or public safety or other imperative reasons of overriding public interest	EIAR Chapter 2 Site Selection and Design Evolution and associated EIAR Technical Appendix 2.1 provide details of the design evolution process which was undertaken by the Applicant and their consultants to address environmental effects including on protected species. This included detailed input on the basis of detailed environmental survey work and a number of workshops with the consultant team to minimise environmental effects on protected species. This included careful location of the turbines and associated infrastructure and a review of the apporpriate maximum height of the turbines to avoid visible turbine lighting. Chapter 8: Ecology of the EIAR provides a detailed assessment of as it relates to Ecology including statutory and non-statutory (non-avian) designations within 10km of the Proposed Development. It includes embedded mitigation measures as detailed within Table 8.11, Chapter 8 of the EIAR. Further Mitigation is provided in Section 8.9 of the EIAR including a Compensatory Habitat Restoration and Deer Management Plan, which are Technical Appendices 8.10 and 8.9 respectively.

Policy Number/Title	Policy Summary	Assessment
	including those of a social or economic nature and beneficial consequences of primary importance for the environment; and • the development will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range. Development that is likely to have an adverse effect, individually and/or cumulatively, on protected bird species will only be permitted where: • there is no other satisfactory solution; and • the development is required in the interests of public health or public safety. This policy will include but is not limited to avoiding adverse effects, individually and/or cumulatively, on the populations of the following priority protected bird species: • species listed in Annex 1 of the EC Birds Directive; • regularly occurring migratory species listed in Annex II of the Birds Directive; • species listed in Schedule 1 of the Wildlife and Countryside Act 1981 as amended; and • birds of conservation concern. Development with adverse effect, individually and/or cumulatively on other protected animals and plants will only be permitted where the development is required for preserving public health or public safety. Development proposals should avoid adverse disturbance, including cumulatively, to badgers and badger setts, protected under the Protection of	This chapter concludes that with the embedded and additional mitigation proposed that there are no significant effects predicted. Chapter 9: Ornithology of the EIAR advises that on the basis of assessment that there would be no significant effects on any Important Ornithological Features ('IOFs') and no adverse effects of the integrity of any designated sites, either individually or cumulatively. Chapter 10: Hydrology of the EIAR confirms that no significant effects are predicted on Ground Water Dependent Terrestrial Ecosystems. **Compliance: The Proposed Development is considered to comply with Policy 58.**

Policy Number/Title	Policy Summary	Assessment
	Badgers Act 1992 (as amended by the Nature Conservation (Scotland) Act 2004 and Wildlife and Natural Environment (Scotland) Act 2011 (as amended).	
Policy 60 Other Important Habitats and Article 10 Features	The integrity of features of the landscape of major importance due to linear and continuous structure or combination as habitat "stepping stones" for the movement of wild fauna and flora. (Article 10 Features) will be safeguarded. The policy advises that the Council will have regard to the value of the following Other Important Habitats, where not protected by nature conservation site designations (such as natural water courses), in the assessment of any development proposals which may affect them either individually and/or cumulatively: • habitats listed in Annex I of the EC Habitats Directive; • habitats of priority and protected bird species (see Glossary); • priority habitats listed in the UK and Local Biodiversity Action Plans; and • habitats included on the Scottish Biodiversity List. Where it is judged that the reasons in favour of a development clearly outweigh the desirability of retaining those important habitats, the Council will seek to put in place satisfactory mitigation measures, including where appropriate consideration of compensatory habitat creation.	EIAR Chapter 2 Site Selection and Design Evolution and associated EIAR Technical Appendix 2.1 provide details of the design evolution process which was undertaken by the Applicant and their consultants to address environmental effects including on other important habitats and Article 10 features. This included detailed input on the basis of detailed environmental survey work and a number of workshops with the consultant team to minimise environmental effects on other important habitats and Article 10 Features. This included careful location of the turbines and associated infrastructure and a review of the apporpriate maximum height of the turbines to avoid visible turbine lighting. Chapter 8: Ecology of the EIAR provides a detailed assessment of Ecology as it relates to Ecology including statutory and non-statutory (non-avian) designations within 10km of the Proposed Development. It includes embedded mitigation measures as detailed within Table 8.11, Chapter 8 of the EIAR. Further Mitigation is provided in Section 8.9 of the EIAR including a Compensatory Habitat Restoration and Deer Management Plan, which are Technical Appendices 8.10 and 8.9 respectively. This chapter concludes that with the embedded and additional mitigation proposed that there are no significant effects predicted. Chapter 9: Ornithology of the EIAR advises that on the basis of assessment that there would be no significant effects on any Important Ornithological Features ('IOFs') and no adverse effects of the integrity of any designated sites either individually or cumulatively. Chapter 10: Hydrology of the EIAR confirms that no significant effects are predicted on Ground Water Dependent Terrestrial Ecosystems. Assessment of the Proposed Development on Peat and associated habitat has already been considered under Policy 55 and concluded that it met with the policy requirement to protect peatland habitat. **Compliance: The Proposed Development complies with Policy 60.**
Policy 61 Landscape	This policy advises that new developments should be designed to reflect the landscape characteristics and special qualities identified in the Landscape Character	Chapter 2: Site Selection and Design Evolution of the EIAR and associated EIAR Technical Appendix 2.1 demonstrates the substantial design iteration process that was undertaken by the Applicant and their consultant team through the EIA process. Careful redesign to take account of the

Policy Number/Title	Policy Summary	Assessment
	Assessment of the area in which they are proposed, including an appropriate scale, form, pattern and construction materials, as well as the potential cumulative effect of developments. The Council encourage measures to enhance the landscape characteristics of the area. The Council will take account of Landscape Character Assessments, Landscape Capacity Studies and its supplementary guidance on Siting and Design and Sustainable Design, together with any other relevant design guidance.	characteristics of the Proposed Development and the receiving environment, particularly to take account of the reasons for refusal of the previous Glencassley application in relation to impacts on the Assynt Coigach National Scenic Area ('NSA') and wild land (particularly the Reay-Cassley Wild Land Area ('WLA34')). This included detailed design input from the landcape architect which has resulted in design iterations for the Proposed Development resulting in the turbine footprint being pushed as far south as possible, to the periphery of the WLA to minimise the extent and range of intervisibility and maximise the distance between the proposed turbines and the Central Core and the north of the 'Western Lobster Claw' where the greatest extent of higher wildness is considered to be present. It has also seen the retention of the turbines at the southern tip of the WLA which is also considered to create a closer connection with the existing Achany and Rosehall wind farms which already lead to a clear limit to the extent of the WLA in this area, and ensures that virtually all parts of the WLA, other than the area directly affected and a small area to the east of the turbines, would retain the connection to the greater body of the WLA to the north and west. The design iterations have included review of the turbine layout to minimise the presence of turbines on higher ground and maintain a cohesive grouping of turbines to minimise the visual envelope of the Proposed Development across the WLA as far as possible and the appearance of turbine spread or outlier turbines. The height of the proposed turbines has been reduced to under 150m in order to avoid the effects of visible aviation lighting on the WLA. The use of existing infrastructure has been considered where possible, to minimise the need for new tracks to be built. The location of tracks and permanent ancillary features such as the substation and welfare facilities has been given careful consideration in relation to the topography of the site, to minimise their visual extent. A high standard of reinstatement is also proposed for temporary areas and borrow pits as described in the Outline Construction Environmental Management Plan (Technical Appendix 3.1) and the Design Statement (Technical Appendix 2.1), and would be implemented and monitored to ensure success as detailed in the Outline Habitat Management Plan (Technical Appendix 8.10). As a result of the design iterations and the Proposed Development is situated at the far southern tip of the WLA, this is where existing wind turbines and forest areas already limit its perceived extent, thereby enabling the connection between the vast majority of the southern part of the WLA to the east and west of Glen Cassley, and the mountainous landscapes to the north and west, which make up the greater majority of the WLA and where the greater extent of wild land is already perceived, to be retained. Within the southern tip, around the more immediate confines of the Proposed Development and within a very small area to the east of the Proposed Development some of the physical and

Policy Number/Title	Policy Summary	Assessment
		perceptual attributes of wild land which contribute to one of four WLA Key Qualities, "Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains," may be less likely to be experienced. However, this would be a very minimal and peripheral part of the WLA overall where the WLA Key Quality is not considered to be strongly present due to the proximity of the existing Achany and Rosehall Wind Farms which are seen from higher ground, and the relatively contained nature of the lower lying corries which results in the perceptions of openness, awe and connection to the mountains not being fully obtained. Beyond the close confines of the Proposed Development, the appearance of the Proposed Development in the south-eastern context may lead to some localised significant effects to the WLA Key Quality across small parts of the upland plateaux areas to the east and west of Glen Cassley. However, it is considered that all of the physical attributes and perceptual qualities which are required to establish the presence of wild land would remain in these areas due to the continued association with the main body of the WLA to the north and west. No significant effects are anticipated to any other part of the WLA, the vast majority of which would be completely unaffected. All of the WLA Key Qualities would therefore continue to be well expressed within the WLA and, despite the potential reduction in the portrayal of some attributes and key qualities within a small peripheral area, it is considered that the integrity of WLA 34 would be retained. The site is located in Group 2: Areas of significant protection, as defined by SPP and THC Onshore Wind Energy Supplmentary Guidance ('SG') due to the south-eastern tip of the Proposal Development falling within WLA34. This Group advises that in areas of wild land, *"development may be appropraite in some circumstances"* and where *"further consideration will be required to demostrate that any signfiicant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation."* It should be noted that the previous Glencassley application made to Scottish Ministers, was assessed by THC and they did not object to the proposal, albeit that recommendation was overturned by Scottish Ministers. This latest iteration moves the development towards the existing Achany Wind Farm to reduce the overall effect and ensure a better fit for the landscape. Consequently, in order to promote the optimal layout, which reduced potential significant landscape and visual effects as far as possible and ensured the integrity of the NSA and WLA was preserved, the site was moved further from the NSA to the southern margins of the WLA34 and to

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		confine the location of turbines to the south of Beinn na Sgerireach, largely limiting the development to part of the WLA34 where there are existing external influences on the WLA including existing wind farm developments[30] or existing features within Glen Cassley[31]. Turbine heights of 200m were considered, but reduced to a maximum turbine tip height of 149.9m, meaning that no visible lighting would be required and infrared lighting could be installed to meet CAA requirements. Chapter 7 Landscape and Visual Amenity of the EIAR provides a detailed Landscape and Visual Impact assessment of the effects of the Proposed Development. Developed in close proximity, and as an extension to the existing Achany Wind Farm, it is considered that the existing presence of Achany reduces the sensitivity of the landscape and visual resource to further wind farm development. The Chapter is supplemented by WLA Assessments (EIAR Technical Appendices Appendix 7.5: Wild Land Area Assessment – Wild Land Area 34: Reay – Cassley and Technical Appendix 7.6: Wild Land Area Assessment – Wild Land Area 37: Foinaven – Ben Hee, in accordance with NatureScot Wild Land Technical Guidance (Sept 2020). Landscape Effects: The majority of effects on the landscape character, designations and protected landscapes is not significant. Significant effects are only predicted within a relatively localised area up to 10km from the Proposed Development and largely confined to areas within Glen Cassley affecting two Landscape Character Types (LCT 135: Rounded hills, Caithness and Sutherland and LCT 142 Strath – Caithness and Sutherland). Section 7.1.5 of the EIAR confirms that the Proposed Development would be located within the southern tip of WLA 34. Reay – Cassley, and significant landscape effects across the plateau areas to the east and west of Glen Cassley would also lead to some significant effects on a localised area within the southern part of the WLA, although the greater majority of the WLA would not be affected and the integrity of the WLA would be retained. EIAR Technical Appendix 7.5 provides the WLA Assessment for WLA34 and concludes in Section 4.5.3 that *"The objectives of the design and layout process (as detailed in Section **Error! Reference source not found.**) have led to the Proposed Development being situated at the far southern tip of the WLA where existing wind turbines and forest areas already limit its perceived extent, thereby*

[30] Existing wind farms include Achany, Rosehall and Lairg.

[31] Features include Duchally and Cassley hydroelectric scheme and associated infrastructure and overhead line connection.

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		enabling the connection between the vast majority of the southern part of the WLA and the mountainous landscapes to the north and west, where the greater extent of wild land is already perceived to be retained. Within the southern tip, around the more immediate confines of the Proposed Development (up to around 2km) and within a very small area to the east of the Proposed Development some of the physical and perceptual attributes of wild land may be less likely to be experienced. However, this would be a very minimal and peripheral part of the WLA overall where the WLA Key Qualities are only partially present. Beyond the close confines of the Proposed Development, whilst localised significant effects may occur to the WLA Key Quality, "Extensive, elevated peatland slopes…" it is considered that all of the physical attributes and perceptual qualities which are required to establish the presence of wild land would remain due to the continued association with the main body of the WLA to the north and west. All of the WLA Key Qualities would therefore continue to be well expressed within the WLA. Therefore, despite the potential reduction in the portrayal of some attributes and key qualities within a small peripheral area, it is concluded that the integrity of WLA 34 would be retained." No signficant effects are predicted to any National Scenic Areas, Special Landscape Areas or Site of the Inventory of Gardens and Designed Landscapes either indiviudally or cumulatively. Visual Effects: Twenty-one Viewpoints ('VPs') formed the basis of the assessment on residential areas within 20km of the Proposed Development, transport and recreational routes. The majority of effects were not significant. The signficant effects on Visual Amenity relate to 6 VPs which are predominantly within 10km of the Proposed Development and no greater than 12.5km away and are focused on three parts of the study area: • Around Achnairn and Shinness on the north-east side of Loch Shin; • Near the confluence of Glen Cassley with Strath Oykeland Kyle of Sutherland; and • To the west and north-west, in and around Glen Cassley and a localised area to the west of Glen Cassley around Meall an Aonaich. Section 7.15.19 of the EIAR advises that *"Overall, the significant visual effects would be relatively localised, and with the exception of VP21 (Meall an Aonaich) and a localised section of Route R17 (Scottish Hill Track 332) all would be confined within an area of less than 10km from the Proposed*

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		Development. The effect on all other visual receptors included in the LVIA including residents, road users and recreational users within the study area was found to be not significant". The cumulative assessment found limited additional significant effects and in some areas, the effect was slightly reduced. The cumulative effect would be slightly greater on WLA34 to the east of Glen Cassley if the Proposed Development was added to a baseline where Sallachy Wind Farm was already operational but slightly reduced to the west of Glen Cassley. However, the EIAR Secton 7.15.25 confirms that *"the vast majority of this extensive WLA would not be affected and that all of the WLA Key Qualities would remain well ecpressed within the WLA and therefore the integrity of the WLA would be retained*". The EIAR Technical Appendix 7.4 also provides a detailed assessment of the the Designated and Protected Landscapes including: • The Assynt Coigach National Scenic Area (NSA) which concludes that the effects on the NSA are considered to be minor and not significant protecting the integrity of the NSA; • Dornoch Firth NSA which concludes that the effects will be negligble and not significant, protecting the itegrity of the NSA; • BenKlibreck and Loch Choire Special Landscape Area ('SLA') which confirms that the effect are minor localised but not signficant effects during construction and operation; and • the Fannichs, Beinn Dearg and Glencalvie SLA which concludes that the effect is negligible and not signifcant protecting the integrity of the designation. • The OWESG is also relevant and an Assessment against this supplementary guidance is also provided in EIAR Section 7.14 and Technical Appendix 7.11, the findings of which are: Criterion 1 Relationship between Settlements/Key locations and wider landscape are respected: The Proposed Development would not be visible from the majority of the main settlements, or would be barely perceptible or viewed in the context of wind turbines already forming a feature and where effects are not significant. Siginificant effects are anticipated at some smaller settlement areas (Rosehall, Achnairn and West Shinness and users of the A838 learing to Lairg from Laxford Bridge) but this comprises a minority of views from residential areas and therefore the threshold of the criteria would not be exceeded by the Proposed Development. **Compliance: The Proposed Development is considered to comply with this criterion.** Criterion 2 Key Gateway locations and routes are respected: The Proposed Development would have a limited effect on the majority of locations considered important Key Gateways however a

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		significant effect has been identified for the A838 (route R4) but it is not anticipated to affect the sense of the gateway perceived when looking across Loch Shin, and Viewpoint 6 which relates to views towards Glen Cassley and away from the Kyle of Sutherland where the sense of gateway is felt. **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 Valued Natural and Cultural Landmarks are respected: The LVIA has identified that there would not be any significant effect to key landmark features which contribute to NSAs or SLAs as a result of the Proposed Development. No mountain Landscape Character Types (LCTs) are anticipated to be significantly affected. The effect on views featuring key natural landmarks such as mountains is generally not anticipated to be significant. There would be significant effects to some views on the north side of Loch Shin, overlooking Loch Shin but this is not anticipated to lead to a deterioration of the appreciation of Loch Shin as a feature of the landscape. The effect from one mountain VP, VP21 (Meall an Aonaich) is anticipated to be significant but not considered likely to affect the wider appreciation of this summit within the context. There would be no significant effect to views from the most popular summits, Ben More Assynt, Ben Klibreck and the Assynt and Coigaich mountains. Whilst there is predicted to be a significant effect to the setting of one Schedule Monument (Dail Landwell Broch), the key relationships with the River Cassley and the glen would still be appreciable and the ability to understand its defensive position would not be diminished. **Compliance: Overall it concludes that the Proposed Development would not diminish the prominence or distrupt the setting to any natural or cultural heritage landmarks ensuring compliance with the criterion.** Criterion 4 The amenity of key recreational routes and ways is respected: Signficant effects are predicted to visual receptors using Core Path SU21.03: Alt an Tuir Burn Walk, users of the public road through Glen Cassley which may be used recreationally and a localised significant effect on longer distance footpath Scottish Hill Track 332 between Kylesku and the A837 near Benmore Lodge (at a point where is passes closer to the Proposed Development). The effects would be relatively localised considering the vailbale recrational routes within the study area and that the effects are not considered to overwhelm or significantly detract from the visual appearance of the routes. There are no significant effects on all Munros and Corbetts and the views from routes ascending these peaks. **Compliance: Overall the proposal is considered to comply with the criterion.** Criterion 5 The amenity of Transport Routes is respected: Significant effects are not predicted on the majority of routes. A moderate significant effect is predicted on one main road route (the

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		A838 between Dalchork and Corrykinloch) but is not considered to overwhelm or significantly dtract from the visual appeal of the route as open adn attractive views would still be retained in areas not affected by the Proposed Development. **Compliance: The Proposed Development is therefore considered to be compliant with this Criterion.** Criterion 6 The existing pattern of Wind Energy Development is respected: There would be some increased effect on landscape character and views and turbines would be taller with longer blade length than existing neighbouring turbines (at Achany Wind Farm and Rosehall Wind Farm). However they would be similarly set on the higher plateau between glens in the Rounded Hills (Caithness and Sutherland LCT) where there is a precedent of existing wind turbines. The difference in turbine dimensions would not normally be perceived in views due to separation leading them to be seen alongside, but as a separate cluster to existing turbines. From the north-west, the Proposed Development would be seen in combination with existing turbines, but the increased scale would lead to its appearing as a separate, closer development. From the south-east, the Proposed Development would be seldom seen to the rear of existing turbines, other than as blades and tips, which would be usually more difficult to perceive. This means that the difference in turbine height would not normally be discernible. From some areas to the south-west and north-east the increased spread of wind turbines would be seen further to the north-west. However, due to the separation from existing wind farms, the greater size of turbines would result in the Proposed Development appearing slightly closer, rather than larger. The Proposed Development would reflect the existing pattern of development along the elevated ridge within a similar landscape context to the existing wind farms. Although there would be a perceptible movement of wind farm development towards the north-west in these views it would still be seen in a context where existing wind turbines affect a similar area. If the consented Creag Riabhach Wind Farm were constructed, this movement would not be so noticeable as Creag Riabhach would appear further to the north-west than the Proposed Development. **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 The need for separation between developments and/or clusters is respected: This is detailed in response to Criterion 6 above. It would usually be seen to form a seperate wind farm

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		cluster and is not anticipated to lead to any change in the way existing development clusters are perceived. It is unlikely to be seen to form one large cluster with existing wind farms from any particular location and the wind turbine cluster would normally be seen as similar in scale to the existing cluster of Achany and Rosehall. **Compliance: The conclusion is compliance with the criterion.** Criterion 8 The perception of landscape scale and distance is respected: Although formed of larger turbines than the existing wind farm and appearing somewhat closer to the viewer from some locations, from most mountain summit areas (with the widest views across the landscape) no notable effects on the perceived scale of the landscape is predicted. For most of these locations, the perception of scale is influenced by a greater sense of distance beyond where the Proposed Development would be seen. From lower areas, it confirms that the Proposed Development would normally be seen as proportionate to the adjacent landscape as turbines have been purposely set away from the highest parts of the site. As an example VP9 – Achnairn Caravan and Camping Site Entrance and VP14 – A838 near West Shinness although predicting a significant effect, the turbines would be seen on the skyline between two adjacent hills with hubs always below the height of the adjacent topography, thereby reducing the prominence of the turbinesto prevent it overwhelming the scale of the ridge. **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 Landscape setting of nearby wind enrgy development is respected: As detailed in Criterion 6 above, the Proposed Development would be close to the existing Achany and Rosehall turbines but would almost always appear as a separate cluster. Due to the slightly higher elevation of existing turbines, their setting is unlikely to be noticeably affected by the Proposed Development, except where the proposed turbines are in front where it forms a closer feature within the landscape setting. However, due to larger turbines, the Proposed Development would still form a clearly separate cluster. It ocncludes that there would not be any locations where the Proposed Development would increase the prominence of existing wind turbines within the landscape setting. **Compliance: The Proposed Development is considered to comply with this criterion.**

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		Criterion 10 Distinctiveness of landscape character is respected: Some localised effects on landscape character are predicted (largely limited to the north of the Proposed Development where existing wind turbines are less influential) affecting LCT135: Rounded Hills - Caithness & Sutherland and LCT142: Strath - Caithness & Sutherland, anticipated to reach up to 8km from the Proposed Development and locally to 10km. A localised significant effect is predicted to Wild Land Area (WLA) 34 Reay Cassley and one of its Key Qualities: *"Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains",* covering a similar area to the east and west of Glen Cassley. It confirms that this is not anticipated to affect the integrity of WLA 34. No significant effects have been identified to any NSA or SLA designated landscapes. Overall, the range of significant effects would be localised and other than within the directly affected confines of the immediate development site, the landscape character would not be fundamentally changed. The integrity of the LCTs is therefore not anticipated to be affected within the study area. Surrounding LCTs would not be significantly affected and as the Proposed Development would be located within the same LCT as existing wind farm development within the surrounding area, no loss to the experience of landscape variety within the study area is anticipated. **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:** **Compliance: 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 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 confrims 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.**

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		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 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	This policy provides support for proposed development which protects and enhances the geodiversity insterest of international, national and regional/local importance in the wider coutryside. The policy also supports improvment of accessibility and interpretation as an education or geo-tourism resource.	EIAR Chapter 2 Site Selection and Design Evolution and associated EIAR Technical Appendix 2.1 provide details of the design evolution process which was undertaken by the Applicant and their consultants to address environmental effects, including on Geodiversity. This included design input on the basis of detailed environmental survey work and a number of workshops with the consultant team to minimise environmental effects on Geodiversity interest. This included careful location of the turbines and associated infrastructure. Chapter 11 Geology and Carbon Balance confirms that the potential effect that the construction and operation of the Proposed Development may have on the geology and soils has been identified and assessed as part of this Chapter. A carbon balance calculation has also been undertaken. The potential effects identified have been assessed and are considered not significant in terms of the EIA Regulations. This included the optimisation of the design of the Proposed Developmet to minimise by avoiding areas of deep peat, wherever possible. The EIAR includes a Peat Slide Risk Assessment as Technical Appendix 11.2 and included 4069 No. Peat proble locations to understand

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		the risk of peat instaility across the site. The results found that the peat slide risk showed the risk of instability was low to negligible and was used to inform the layout design and micro-siting for the proposed infrastructure. **Compliance: The proposed development complies with the requirements of Policy 62.**
Policy 63 Water Environment	This policy provides support for developments that do not compromise the objectives of the Water Framework Directive (2000/60/EC).	EIAR Chapter 2 Site Selection and Design Evolution and associated EIAR Technical Appendix 2.1 provide details of the design evolution process which was undertaken by the Applicant and their consultants to address environmental effects, including the requirement to protect the water environment. This included design input on the basis of detailed environmental survey work and included a number of workshops with the consultant team to minimise environmental effects on the water environment. This included careful location of the turbines and associated infrastructure. Chapter 10 Hydrology of the EIAR provides a detailed assessment of the Proposed Development on the Water Environment and confirms that subject to the mitigation to be identified and agreed as a final Construction Environment Management Plan, good practice and accordance with current guidance from SEPA that there are not predicted to be any significant effects, either individually or cumulatively from the Proposed Development. **Compliance: The Proposed Development complies with Policy 63.**
Policy 64 Flood Risk	This policy requires that development proposals should avoid areas susceptible to flooding and promote sustainable flood management. Development proposals within or bordering medium to high flood risk areas will need to demonstrate compliance with Scottish Planning Policy (SPP) through the submission of suitable information, which may take the form of a Flood Risk Assessment. Development proposals outwith indicative medium to high flood risk areas may be acceptable. However, flood prevention management may be required where: • better local flood risk information is available and suggests a higher risk; or	Chapter 10 Hydrology of the EIAR provides a detailed assessment of the Proposed Development on the Water Environment including the requriement to prevent flooding and ensuring sustainable flood management. The chapter confirms that subject to the mitigation to be identified and agreed as a final Construction Environment Management Plan, good practice and accordance with current guidance from SEPA that there are not predicted to be any significant effects, either individually or cumulatively from the Proposed Development. **Compliance: With implementation of committed mitigation, the Proposed Development complies with Policy 64.**

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	• a sensitive land use (as specified in the risk framework of Scottish Planning Policy) is proposed. Where flood management measures are required, natural methods such as restoration of floodplains, wetlands and water bodies should be incorporated, or adequate justification should be provided as to why they are impracticable.	
Policy 65 Waste Water Treatment	Where relevant, this policy requires connection of proposed development to the public sewer, unless a proposed development is unable to connect and would not be likely to result in significant environmental or health problems.	There is limited foul drainage anticipated from the development and this will predominatly relate to the proposed welfare building during construction, maintenance during operation and decommissioning. A connection to the public sewer will not be made but a septic tank or similar will be proposed to address foul sewage, the location and suitability of which to protect the environment and health of staff/public can be conditioned. **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.**
Policy 66b Surface Water Drainage	This policy requires that all proposed development must be drained by Sustainable Drainage Systems (SuDS) designed in accordance with The SuDS Manual (CIRIA C697) and where appropriate, the Sewers for Scotland Manual 2nd Edition. Planning applications should be submitted with information in accordance with Planning Advice Note 69: Planning and Building Standards Advice on Flooding paragraphs 23 and 24. Each drainage scheme design must be accompanied by particulars of proposals for ensuring long-term maintenance of the scheme.	Chapter 10 Hydrology of the EIAR provides a detailed assessment of the Proposed Development on the Water Environment including the requriement to prevent flooding and ensuring sustainable flood management and appropraite design to address surface water drainage. The chapter confirms that subject to the mitigation to be identified and agreed as a final Construction Environment Management Plan, good practice and accordance with current guidance from SEPA that there are not predicted to be any significant effects, either individually or cumulatively from the Proposed Development. **Compliance: With implementation of committed mitigation, the Proposed Development complies with Policy 66b.**
Policy 67 Renewable Energy Developments	This policy advises that Renewable Energy proposals must demonstrate that they are well related to the primary renewable resource.	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;

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	It advises that the Council will consider the contribution a proposed development makes in meeting renewable energy targets and any negative or positive effects on the local and national economy. It confirms it will assess proposals against other policies of the development plan, the Highland Renewable Energy Strategy[32] and Planning Guidelines and taking account of other material considerations including whther it can demonstrate significant benefits including making effective use of existing and proposed infrastructure or facilities. The Council advises that it will support development where it is located, sited and designed so that it will not be significantly detrimental overall, either individually or cumulatively with other development and in particular on: • natural, built and cultural heritage features; • species and habitats; • visual impact and impact on the landscape character of the surrounding area (the design and location of the proposal should reflect the scale and character of the landscape and seek to minimise landscape and visual impact, subject to any other considerations); • amenity at sensitive locations, including residential properties, work places and	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 2 Site Selection and Design Evolution and associated Technical Appendix 2.1 confirms that the site has sought to make best use of the existing infrastructure of the existing Achany Wind Farm to limit the overall effects of the development. It also confirms the established wind resource which is evidenced by the presence of the existing Achany wind farm which this Proposed Development intends to extend. Chapters 8 Ecology and 9 Ornithology of the EIAR confirm no significant residual effects, with committed mitigation. Chpater 12 Cultural Heritage of the EIAR advises that only one moderate signficant effect is predicted to Dail Langwell Broch (Asset 45), a scheduled monument. However Chapter 12 confirms that *"The design has considered the presence and setting of the Scheduled Dail Langwell Broch (Asset 45) and sought to reduce impacts upon the setting of it, particularly by limiting the number of turbines that can be seen from within the glen and by moving turbines south towards the existing Achany Wind Farm. When compared with the previous 2012 Glencassley application this has reduced the effect upon the setting of the broch by limiting the views from the broch in which turbines would be seen and by moving the majority of turbines behind the ridgeline which marks the eastern extent of the glen".* Therefore, whilst a moderate significant effect has been predicted, the Chapter concludes that as it retains the key relationships with the River Cassley and glen remaining appreciable and the ability to understand its defensive position means it is not dimished by the Proposed Development and therefore there would not be an adverse effect upon the integrity of the assset's setting. On the basis of the iterative design proceess which was undertaken to protect designated assets, taking account of the site individually and cumulatively, no significant cumulative effects on archaeology or cultural heritage have been identified. Chapter 7 Landscape and Visual Amenity has been addressed in detail under Policy 61 and found to comply with the requirements to consider the landscape character.

[32] THC are no longer treating the Highland Renewable Energy Strategy as a material consideration but generation targets will be carried forward for monitoring purposes.

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	recognised visitor sites (in or outwith a settlement boundary); • the safety and amenity of any regularly occupied buildings and the grounds that they occupy - having regard to visual intrusion or the likely effect of noise generation and, in the case of wind energy proposals, ice throw in winter conditions, shadow flicker or shadow throw; • ground water, surface water (including water supply), aquatic ecosystems and fisheries; • the safe use of airport, defence or emergency service operations, including flight activity, navigation and surveillance systems and associated infrastructure, or on aircraft flight paths or MoD lowflying areas; • other communications installations or the quality of radio or TV reception; • the amenity of users of any Core Path or other established public access for walking, cycling or horse riding; • tourism and recreation interests; and • land and water based traffic and transport interests. Where approved, the Council will seek to include appropriate conditions and planning obligations, including a section 75 legal agreement to secure the removal of the development when the consent expires, unless a fresh consent has been secured to extend the life of the Proposed Development or where the Proposed Development should cease to operate for a specific period of time.	To protect amenity of sensitive locations and receptors, Chapter 15: Noise and Vibration of the EIAR confirms that due to the significant distance between any part of the Proposed Development Infrastructure and residential developments that no significant effects of noise or vibration to sensitive receptors are predicted, either individually or cumulatively. It confirms that nothwithstanding this, best practice mitigation will also be adopted to manage noise during construction, including restrictions on working hours (as detailed in Section 1.5.9 of this Planning Statement). Whilst Chapter 7 provides assessment of the visual effects, as detailed under Policy 61 and confirms that there would be some limited signifcant effects to five residential receptors in a localised area up to 10km of the Proposed Development where the Proposed Development would be viewed as a new feature in the landscape. The effect on all other residential receptors is not significant. Chapter 11 Geology and Carbon Balance of the EIAR advises in Section 11.7.7 that *"The net emissions of carbon dioxide from the project are expected to be 168,549 tonnes of CO2e. Because the project is expected to generate over 10.5 million MWh of electricity over its 50-year lifetime, this represents a savings of carbon dioxide for each unit of electricity generated by the project which otherwise would have been generated by other sources. Once the wind farm is operational, it is expected to result in an annual savings of 53,490 tonnes of CO2e versus grid-mix electricity generation. As such, the project has a payback time of 3.2 years compared to grid-mix electricity generation. These savings are even greater (and payback time faster) when compared to fossil fuel-mix electricity and coal-fired electricity".* Chapter 17: Other Issues confirms that with regard to other matters including: Telecommunications; Television and Radio; Shadow Flicker; Ice Throw; Air Quality; Climate change; Pollution and Human Health and Risk of Major Accidents and Disasters that with the inclusion of mitigation (where relevant) either no effect or no signficant effects are predicted from the Propsoed Development. Chapter 16: Aviation of the EIAR confirms that whilst there was a potential significant effect on Military Low Flying prior to mitigation, following proposed mitigation to include aviation lighting in discussion with the Minstry of Defence, there will be no predicted significant effects on Aviation interests. Chapter 13 Traffic and Transport of the EIAR confirms that there are no Core Paths or other established routes within the site or in proximity that would be affected by traffic movements associated with the Proposed Development either individually, or cumulatively.

Policy Number/Title	Policy Summary	Assessment
		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 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, 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

Policy Number/Title	Policy Summary	Assessment
		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	This policy requires a detailed assessment on the levels, character and transmission and the receiving environment of any potential pollution to be provided taking account, noise, air water and light and which demonstrates that pollution can be appropriately avoided or if necessary mitigated. Major development is expected to accord with the approach set out in the Council's Guidance Note "Construction Environmental Management Process for Large Scale Projects" or a similar approach.	Chapter 2 Site Selection and Design Evolution confirms that as part of the embedded design mitigation, a maximum turbine height of 149.9m was selected to remove the requirement for visible lighting. A Schedule of Mitigation is included in Chapter 18: Schedule of Mitigation of the EIAR and includes pollution prevention measures which confirms that with mitigation, that there are no significant effects relating to pollution predicted for the Propsoed Development. An outline CEMP is provided as EIAR Technical Appendix 3.1. Chapter 15: Noise and Vibration of the EIAR confirms that due to the significant distance (1.5km) between any part of the Proposed Development Infrastructure and residential developments that no significant effects of noise or vibration to sensitive receptors are predicted, either individually or cumulatively. It confirms that nothwithstanding this, best practice mitigation will also be adopted to manage noise during construction, including restrictions on working hours (as detailed in Section 1.5.9 of this Planning Statement). **Compliance: The Proposed Development accords with Policy 72.**
Policy 77 Public Access	This policy advises that where a Proposed Development affects a route included in a Core Paths Plan or an access point to water, or significantly affects wider access rights, then the Council will require it to either: • retain the existing path or water access point while maintaining or enhancing its amenity value; or	Assessment under Policies 61 and 67 provide confirmation of the predicted effects and overall suitability of the development with regard to the environmental effects on public access routes, particuarly visual effects. Chapter 13 Traffic and Transport of the EIAR confirms that there are no Core Paths or other established routes within the site or in proximity that would be affected by traffic movements associated with the Proposed Development either individually, or cumulatively.

Policy Number/Title	Policy Summary	Assessment
	• ensure alternative access provision that is no less attractive, is safe and convenient for public use, and does not damage or disturb species or habitats.	Chapter 14 Socio-economic Recreation and Tourism of the EIAR confirms that an Outdoor Access Management Plan will be prepared for the Proposed Development, a draft of which is provided in the EIAR Technical Appendix 14.2. **Compliance: The Proposed Development complies with Policy 77.**
Policy 78 Long Distance Routes	This Policy confirms the Council and partners will safeguard and seek to enhance long distance routes.	Chapter 7 Lanscape and Visual Amenity confirms the assessment of three longer distance routes/ trails, comprising a combination of different road or path routes considered individually in the assessment, were identified for inclusion in the detailed assessment. This includes: • The Moray Firth Tourist Route; • National Cycle Route 1; and • The Cape Wrath Trail / Scottish National Trail. The assessment confirmed that the Proposed Development would not significantly affect the long distance routes. **Compliance: The Proposed Development complies with Policy 78 to safeguard long distance routes.**

Onshore Wind Energy Supplementary Guidance 2016 (and update 2017)

3.4.4 The adopted OWESG also forms part of the development plan and provides 10 criteria against which the Proposed Development requires to be assessed with regard to landscape and visual effects. Table 7.4.1 of EIAR Chapter 7 Landscape and Visual Amenity provides a summary of the detailed assessment against the criteria contained in EIAR Technical Appendix 7.11. . The findings of the assessment are provided in detail under Policy 61 and should be referred to. This confirms that the Proposed Development does not breach the thresholds of the supplementary guidance with regard to landscape character and visual amenity and ensures broad compliance with the OWESG in this respect.

3.4.5 Other requirements of the OWESG include:

- **Siting and Design** which seeks consideration of: safeguarding of important natural environment features including high quality landscapes; ensuring the operational efficiency of the wind farm is balanced with the mitigation of adverse impacts; design and layout of access tracks and associated infrastructure (including connection to the electricity transmission grid, where this information is available); explanation of the evolution of the Proposed Development design and addressing SNH (now NatureScot) guidance on Siting and Designing windfarms in the landscape (2014); and consideration of the cumulative impact of an increasing number of wind turbines. This has been addressed by Chapter 2 Site Selection and Design Evolution of the EIAR and assessed under Policy 61 and Policy 67 in Table 3.1 above and is considered to as a whole to comply with the OWESG requirements.
- **Safety and Amenity** which seeks to protect safety and residential amenity, particularly on residential buildings as well as communities' amenity including residential properties, work places and recognised visitor sites. Key considerations will include: safety; landscape and visual impacts; noise; and shadow flicker and blade glint, glare and light effects. These are addressed in Table 3.1 above under Policy 67 and the Proposed Development is considered to be compliant.
- **Safety of Airports Defence and Emergency Service Operations**: requiring Proposed Developments to seek to avoid significant adverse effects individually or cumulatively on flight activity, navigation, surveillance and associated infrastructure. This is addressed in Table 3.1 above under Policy 67 and the Proposed Development is considered to be compliant.
- **Operational Efficiency of Other Communications**: have regard to protecting radio, TV, telecoms and other communications systems. Chapter 17 Other Issues of the EIAR confirms that there are no significant effects predicted for operational efficiency of other communications and the proposal is therefore considered to comply with this requirement of the OWESG.
- **The Natural and Historic Environment:** highlights a list of 10 key aspects which need to be considered to manage development in relation to the natural and historic environment. These matters have been addressed under Policies 57, 58 and 60 as assessed in Table 3.1 above and the Proposed Development is considered to comply with the requirements of the OWESG.
- **The Water Environment:** confirmation that the Proposed Development is designed to avoid impacts on the water environment wherever possible, or when impacts

cannot be avoided, demonstration that the impacts will be mitigated. Measures should include a Construction Environmental Management Plan ('CEMP'). This is addressed in Table 3.1 above, under Policy 63. A draft CEMP is contained as EIAR Technical Appendix 3.1 and the Proposed Development is considered to be compliant.

- **Peat:** confirming the key factors to be taken into account regarding Proposed Development that has a potential to affect peat and requirements to be included in a Peat Management Plan within a CEMP. Chapter 2: Site Selection and Design Evolution details how the Proposed Development has been designed to minimise disturbance of peat. Chapter 11 Geology and Carbon Balance confirms that a Peat Slide Risk Assessment has been undertaken Technical Appendix 11.2 and a Peat Management Plan is provided as Technical Appendix 11.3. This is confirmed in Table 3.1 under Policy 55. The Proposed Development is considered to be compliant.
- **Trees and Woodland**: providing a list of key issues to manage and safeguard trees and woodland in relation to windfarms. There are no significant effects predicted to trees or woodland, ensuring compliance with this OWESG requirement.
- **Tourism and Recreation**: outlining that the Council may require a tourism impact assessment subject to the nature and scope of the assessment of development proposals and consideration of socio-economic considerations to be addressed. This is addressed by EIAR Chapter 14 Socioeconomic Recreation and Tourism and by Chapter 7 Landscape and Visual Amenity and assessed under Policy 67, Table 3.1 above, ensuring compliance with the OWESG.
- **Public Access**: confirming all proposals should seek to avoid significant adverse effects, encourage improvement and create new opportunities for the quality and quantity of public access, including routes in a Core Paths Plan, access to water, wider access rights or Rights of Way and adequately mitigate any adverse effects. It provides a requirement for Major Development to include an Access Plan. A Design and Access Statement and Outdoor Access Plan are also provided as EIAR Technical Appendix 2.1 and 14.2 respectively. No significant effects are predicted to public access, including Core Paths, as assessed under Policies 67 and 77 in Table 3.1 above ensuring compliance with the OWESG requirements.
- **Traffic and Transport Interests**. This requires proposals to avoid significant adverse effects on the public road network individually and cumulatively and ideally locate where the road network can accommodate the development, or where mitigation can bring the road network to a suitable standard. It confirms the requirement for a Transport Assessment. Chapter 13 EIAR provides the Traffic and Transport assessment and confirms that with mitigation there will be no significant effects. This is assessed under Policies 56 and 67 in Table 3.1 above.
- **Electricity and Gas Infrastructure**: this must be protected through appropriate separation distances. Chapter 2 Site Selection and Design Evolution confirms that appropriate buffers and distances from infrastructure are achieved.
- **Noise Assessment**: Confirming the assessment requires to be undertaken in accordance with the guidance document ETSU-R-97 'The Assessment and Rating of Noise from Wind Farms (ETSU)'. It provides expectations of the noise limits. Chapter 15 of the EIAR confirms that no significant effects of the Proposed Development to Noise Sensitive Receptors are predicted due to the distance, but

best practice construction measures and mitigation of construction hours are also proposed.

- **Borrow Pits**: advises that aggregate and other mineral resources should be sourced from local quarries and only use on-site borrow pits where there are significant environmental or economic benefits compared to obtaining material from quarries. Chapter 11 Geology and Carbon Balance confirms that a Borrow Pit Report is included as Technical Appendix 11.1 and Chapter 2 Site Selection and Design Evolution confirms the justification for the siting and details of the borrow pits. Chapter 7 provides an assessment of the location of the borrow pits within its assessment addressed under Policy 61.
- **Mitigation/CEMP/Restoration Bonds**: Provides detailed guidance on the expectations of information to be provided in support of development proposals and how matters may be conditioned or controlled through Section 75 Legal Agreement, if required. EIAR Chapter 18 provides a schedule of mitigation and the Applicant is willing to enter into Section 75 negotiations regarding required Planning Obligations.

4. Summary and Conclusions

4.1.1 The primary objective of this Planning Statement is to present the Proposed Development for the extension to Achany Wind Farm within the context of the current Planning Framework. The primary component of which is an assessment against the requirements of the Electricity Act. The Proposed Development is supported by an EIAR 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) 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 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.

4.1.2 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.

4.1.3 Notwithstanding, the Development Plan provides local planning policy and guidance and is therefore considered to be a relevant material planning consideration and has been addressed through a detailed assessment in Chapter 3 of this Planning Statement. Assessed against the Development Plan and Supplementary Guidance, the EIAR has found a limited number of localised significant effects relating to the landscape and visual effects and no significant landscape effects on National Scenic Areas, Special Landscape Areas or other designated sites. Chapter 12 Cultural Heritage has also identified a moderate significant effect on Dail Langwell Scheduled Monument. However, the Chapter concludes that as the asset retains the key relationships with the River Cassley and glen remaining appreciable, the ability to understand its defensive position is not diminished by the Proposed Development, therefore there would not be an adverse effect upon the integrity of the asset's setting.

4.1.4 Whilst other effects have been identified by the EIA, with appropriate mitigation, the residual effects are not considered to be significant.

4.1.5 The process of design iteration and committed mitigation has secured the most appropriate development of the Site and limited and substantially overcome the environmental effects as much as possible. Considered in the round, the Proposed Development is considered to comply with the Development Plan and Supplementary Guidance.

4.1.6 Additionally, this Planning Statement considers other relevant material considerations, which comprise, primarily: National planning policy guidance and advice.

4.1.7 This Planning Statement has identified that as a proposal for renewable onshore energy, it benefits from significant supportive weight from National Energy, Climate Change and Planning Policies, including NPF3 and SPP. It is recognised that onshore wind is an important part of the UK and Scotland's energy supply mix, requiring increased support for suitable proposals. The Proposed Development provides a suitable, sustainable renewable energy scheme which will make a significant contribute to the UK's transition to a low carbon economy, secure renewable energy generation and helps address the Climate Emergency.

4.1.8 Chapter 2 identifies the International, UK and Scottish Government legislation and policy including targets to achieve an equivalent of 50% of demand for electricity from renewable sources by 2030 and to secure complete decarbonisation by 2050. Chapter 14 of the EIAR confirms the direct contribution that the development can make towards the Scottish Governments renewable energy targets. As an extension to the existing Achany Wind Farm, the Proposed Development would:

- Deliver installed capacity in excess of 80MW;
- Deliver a combined capacity in excess of 118MW with the existing Achany Wind Farm;
- Secure a reduction in carbon dioxide through provision of electricity from a renewable resource to replace fossil fuel generation;
- Provide an important contribution towards meeting the ambitious International, 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.

4.1.9 The Proposed Development is a revised scheme. The Applicant has reviewed the potential of the site as recognised by Scottish Ministers in the Planning History Section of this report. In doing so the Proposed Development has gone through a significant design evolution (as described in Section 1.4 of this Statement, EIAR Chapter 2 Site Selection and Design Evolution and EIAR Technical Appendix 2.1 Design and Access Statement) in order to address the reasons for refusal of the 2012 application. Ministers will find that the detailed evidence as contained in Chapter 7 Landscape and Visual Amenity and associated Technical Appendices and Visualisations demonstrate the evidence of the positive evolution of the scheme. This evolution seeks to address the view of Scottish Ministers that the 2012 application had not evolved sufficiently to address the effects on wild land and the NSA. The Applicant believes that the further evolution informed principally by their consultant landscape architect has secured improvement to substantially overcome the landscape and visual effects to an extent where they are not considered unacceptable effects. The application before Ministers therefore seeks to promote the most suitable design for the location.

4.1.10 The final design ensures that it is located in an area most acceptable, in principle, for the Proposed Development and demonstrates that 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 as required by the provision of the Electricity Act.

4.1.11 This Planning Statement does not consider the potential effects of the Proposed Development in detail as this is dealt with in the EIA Report. However, the conclusions of the EIA Report are assessed and summarised, and therefore this Planning Statement concludes that, with appropriate mitigation measures, the Proposed Development can be accommodated within its receiving environment without significant adverse unacceptable impact.

4.1.12 The Proposed Development accords with the National requirement to encourage the sensitive development of the renewable energy sector and provide an important contribution to Scotland's energy mix whilst delivering important jobs and economic benefits to rural Scotland and in particular to fragile areas. Critically, the Proposed Development recognises the need to balance the protection of the environment with the development of sustainable mixed communities.

4.1.13 In summary, the level of predicted significant effects 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 Achany Wind Farm Extension.

APPENDIX 1: DECISION NOTICE FOR GLENCASSLEY S.36 APPLICATION MADE TO SCOTTISH MINISTERS REFERENCE EC00005263

Energy and Climate Change Directorate
Energy Division

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The Scottish Government

Fiona Pogorzelec
SSE Generation Limited
55 Vastern Road
Reading
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RG1 BBU

17 November 2015

Dear Ms Pogorzelec

REFUSAL OF CONSENT FOR SECTION 36 APPLICATION TO THE SCOTTISH MINISTERS TO CONSTRUCT AND OPERATE THE GLENCASSLEY WIND POWERED ELECTRICITY GENERATING STATION NEAR LAIRG, SUTHERLAND

Application

I refer to the Application made by SSE Generation Limited ("the Company") dated 9 July 2012 for consent under section 36 of the Electricity Act 1989 ("the Electricity Act") for construction and operation of Glencassley wind farm electricity generating station ("the Development"), situated at Glencassley Estate, by Lairg in Sutherland. The Application is for construction and operation of a generating station with a generation capacity of up to 78MW. **This letter contains the Scottish Ministers' decision to refuse the application.**

Planning permission

In terms of section 57(2) of the Town and Country Planning (Scotland) Act 1997 the Scottish Ministers may on granting consent under section 36 of the Electricity Act direct that planning permission is deemed to be granted in respect of that generating station and any ancillary developments. No such direction is being made as Scottish Ministers are not granting consent under section 36 of the Electricity Act.

Consultation

In accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000 ("the EIA Regulations") the Company submitted on 9 July 2012 an Environmental Statement (ES) describing the development and giving an analysis of its environmental effects. In accordance with statutory requirements, advertisement of the Application and Environmental Statement was made in the local

and national press and they were placed in the public domain, and the opportunity given for those wishing to make representations to do so.

Under Schedule 8 of the Electricity Act, the relevant planning authority is required to be notified in respect of a section 36 consent application. Notifications were sent to The Highland Council as the Planning Authority, as well as to Scottish Natural Heritage (SNH) and the Scottish Environment Protection Agency (SEPA).

The Highland Council and SEPA did not object to the Application but sought that certain conditions were imposed. SNH maintained an objection due to the impacts the Development would have on wild land. SNH required that the proposal is made subject to conditions in relation to the Caithness and Sutherland Peatlands Special Area of Conservation (SAC) and Special Protection Area (SPA), and the River Oykel Special Area of Conservation. The John Muir Trust, the Mountaineering Council of Scotland and other third parties also objected to the application.

Following the publication of the new Scottish Planning Policy (SPP) in June 2014, Scottish Ministers undertook, commencing on 27 August 2014, a further consultation asking parties who had made representations previously their views on amended policies in the new SPP in relation to the Development proposal, in particular amended policies on wild land and National Scenic Areas.

The Scottish Ministers' Considerations

Consideration of a Public Local Inquiry

The Highland Council (a statutory consultee and the relevant planning authority) did not raise an objection to the Development. As the relevant planning authority did not object, a Public Local Inquiry (PLI) is not a statutory requirement.

Ministers have considered fully and carefully the Application, Environmental Statement and all relevant responses from consultees (including those from SNH and SEPA) and third party representations received. We have also considered the 78 objections raised within the 90 public representations received.

The Scottish Ministers have taken all material considerations into account. Ministers consider that there are no significant issues which have not been adequately considered in the Application, Environmental Statement, consultation responses and third party representations and that they have sufficient information to be able to make an informed decision on the Application without the need for a PLI and that it is not appropriate to hold a PLI.

Environmental Matters

The Scottish Ministers are satisfied that the environmental information including the Environmental Statement has been produced in accordance with the EIA Regulations and that the applicable procedures regarding publicity and consultation laid down in those Regulations have been followed. They assessed the environmental impacts of the proposed Development and have done so taking the environmental information into consideration when reaching their decision.

The Scottish Ministers are satisfied that the Company, when formulating its proposal to construct the generating station, had regard to the desirability of preserving the natural beauty of the countryside, of conserving flora, fauna, and geological and physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic, or archaeological interest.

The Scottish Ministers have had regard to the desirability of the matters mentioned in the previous paragraph and the extent to which the Company has done what it reasonably could to mitigate the effects of the Development on those features, and are satisfied that the Company has done what it reasonably could with regard to mitigation.

The Scottish Ministers have considered fully and carefully the Application, Environmental Statement, all relevant responses from consultees and third party representations received. A summary of the consultee responses can be found at Annex 1.

Main determining issues

The Scottish Ministers, having taken account of the application, Environmental Statement and the responses from consultees and third parties, consider that the main determining issues are:

- the extent to which the Development accords with and is supported by Scottish Government policy and the terms of the development plan;
- environmental impacts of the Development in particular:
  - (a) the impact on the River Oykel SAC, the Caithness and Sutherland Peatlands SAC and the Caithness and Sutherland Peatlands SPA and Ramsar Site;
  - (b) the landscape and visual impact of the Development;
  - (c) impacts on wild land; and
  - (d) the estimated contribution made by the Development to reducing CO_2 emissions;
- the estimated economic benefits which the Development is likely to bring, and;
- the renewable energy benefits of the Development.

Scottish Government Policy Context

The National Planning Framework 3 (NPF3) sets out the Scottish Government's commitment to establishing Scotland as a leading location for the development of renewable energy technology. NPF3 describes how, in our more remote areas, this will bring new employment, reverse population decline and stimulate demand for development and service. NPF3 considers that onshore wind will continue to make a significant contribution to diversification of energy supplies, in the right places, with a desire to not see wind farm development in our National Parks and National Scenic Areas. NPF3 advises that Scottish Planning Policy sets out the required approach to spatial frameworks which will guide new wind energy development to appropriate locations, taking into account important features including wild land.

The Scottish Government supports onshore wind energy development in appropriate locations. The Scottish Planning Policy 2014 (SPP) introduces a presumption in favour of development that contributes to sustainable development. Paragraph 28 of SPP sets out that the planning system should support economically, environmentally and socially sustainable places by enabling development that balances the costs and benefits of a proposal over the longer term. The aim is to achieve the right development in the right place; it is not to allow development at any cost.

Paragraph 29 of SPP sets out that policies and decisions should be guided by certain principles, including: giving due weight to net economic benefit; supporting delivery of infrastructure, including energy, and; protecting natural heritage, including landscape and the wider environment. SPP also states that the planning system should support the development of a diverse range of electricity generation from renewable energy technologies – including the expansion of renewable energy generation capacity.

Paragraph 169 of SPP states that proposals for energy infrastructure developments should always take account of spatial frameworks for wind farms and heat maps where these are relevant. Applying the spatial framework in the SPP, the Development would be located in an area of significant protection. The SPP states that further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

Paragraph 215 of SPP sets out that in areas of wild land, development may be appropriate in some circumstances, and that further consideration will be required to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation.

Paragraphs 161 (and related Table 1) and 200 of SPP set out advice for development plans but are still a consideration. Paragraph 200 states: "Wild land character is displayed in some of Scotland's remoter upland, mountain and coastal areas, which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development. Plans should identify and safeguard the character of areas of wild land as identified on the 2014 SNH map of wild land areas."

In remote and fragile areas and island areas, SPP encourages development that provides suitable sustainable economic activity, while preserving important environmental assets such as landscape and wildlife habitats that underpin continuing tourism visits and quality of place.

It is further noted that in remote rural areas, where new development can often help to sustain fragile communities, plans and decision-making should generally:

- encourage sustainable development that will provide employment;
- include provision for development which supports sustainable economic growth in a range of locations, taking account of environmental protection policies and addressing issues of location, access, siting, design and environmental impact.

Ministers have considered the fact that there would be impacts from the Development on sensitive and remote areas. Whilst acknowledging that the location of the turbines has been considered carefully and that the landscape and visual impacts have been limited where possible, through the design iteration process, in particular through considering the removal of 3 originally proposed turbines, significant impacts on wild land would remain such that the Development would not be compatible with wild land policy. The SPP also requires that the impacts of the Development on the special qualities of the on Assynt – Coigach NSA are taken into account.

Ministers note that whilst the Development would make a significant contribution towards meeting greenhouse gas emission and renewable electricity targets, as well as the diversification of energy supplies, the Development does not currently support the Scottish Government's ambitions for community and local ownership of renewables as expressed in the Community Energy Policy Statement.

Scottish Ministers have considered the Company's socio-economic assessment within the ES which suggests that between £29 - £49 million of Gross Value Added (GVA) would be generated within the Highland Council boundary area over the lifetime of the Development and agree the Development is likely to have some positive socio-economic effects.

In considering all of the aspects together, Ministers conclude that overall the Development is not supported by the SPP.

Compatibility with Local Development Plan and Supplementary Guidance

The Interim Supplementary Guidance on On-shore Wind Energy provides the spatial framework and guidance on which the views of the Planning Authority on wind farm applications are based. Ministers note the application is located within an Area of Search, one which is therefore, in principle, likely to be supported subject to more detailed consideration of the HwLDP policies.

The Highland-wide Local Development Plan 2012 (HwLDP) recognises the potential for renewable energy development in Highland. Policy 67 (Renewable Energy Developments) gives general support to this type of renewable energy development and is the key policy consideration in assessing this application. Ministers note the Council's assessment that the Development is acceptable under 9 of the 11 criteria within Policy 67, and agree with the Council's findings that there would be adverse impact under "Landscape & Visual Impact" and "Amenity at Sensitive Locations" criteria.

Ministers note the Highland council's support of this Development but have considered the significant impacts of the Development on Assynt – Coigach NSA and wild land highlighted by SNH below and weighed them against the benefits of the Development in the context of other relevant national polices. Specifically, the Scottish Planning Policy, published in June 2014, is a key consideration in this case.

Possible effects on European Protected Sites

The Conservation of Habitats and Species Regulations 2010 (as amended) ("the Habitats Regulations)" require Scottish Ministers to consider whether the Application would be likely to have a significant effect on a European Site, as defined in the Habitats Regulations. The Development site adjoins or is near classified sites and has the potential to affect the River Oykel SAC designated for Atlantic salmon and freshwater pearl mussel, the Caithness & Sutherland Peatlands SAC (Ramsar Site and Grudie Peatlands and Strath an Loin SSSI) designated for peat, heath and freshwater habitats, rare plant and otter, and the Caithness & Sutherland Peatlands SPA, classified for a number of wader and raptor species.

SNH took the view that the proposal is likely to have a significant impact on the qualifying interests of these sites and as such, Scottish Ministers, as the competent authority were required to undertake Appropriate Assessments. These concluded that there would not be an adverse effect on the integrity of either the SAC or the SPA, subject to the imposition of conditions as recommended by SNH.

Landscape and Visual Impacts

Ministers note SNH concerns that the Development would have significant impacts on the Strath Landscape Character Type (LCT) of Glen Cassley. SNH also expressed concerns that the Development would introduce turbines into an area that is not currently affected by wind farm development across *Moorland Slopes & Hills LCT.* SNH consider the effects on the Lone Mountain Assynt LCT would be significant in part particularly affecting eastern parts and summits.

The Assynt unit of the Lone Mountain LCT lies to the north–west of the site, visibility of the Development is restricted to the eastern slopes and elevated areas. From the summit of Ben More Assynt, which lies within the north of the Assynt Unit, hill walkers would see the whole Development with the nearest turbine at 12.7 km.

The Company recognised the high sensitivity at this Lone Mountain (Assynt) LCT particularly from Ben More Assynt viewpoint, recognising it lies within the Assynt–Coigach NSA and SAWL. They suggest in their ES that the Development's effect on the landscape character of the Assynt unit would be not significant. The Company states the Development would be seen immediately adjacent to Achany, Rosehall and Lairg wind farms. Also within the wider view the more distant wind farms at Kilbraur and its extension (at 43.5km) Beinn nan Oighrean and Beinn Tharsuinn (at 43km) would be visible in clear conditions.

SNH disagree, as they do not consider that the Lone Mountain (Assynt) LCT currently experiences significant landscape impacts from distant wind farms. SNH state in particular, the proximity of the wind farm and views of the whole of the Development would result in changes to the experience of the remote Lone Mountain LCT, resulting in a significant effect.

In response to The Highland Council's recommendations, the Company agreed to amend the scheme removing 3 of the most visible turbines (turbines 01,02 and 03) to receptors to the north, thus significantly reducing the visual impact of the

Development from the A836, A838, and properties at Achnairn. Whilst some visibility would remain from a distance, Ministers note the Development overall is not seen as having significant visual impact on local communities and settlements.

7.5 kilometres westward of the Development site is the boundary of the Assynt-Coigach NSA. SNH considers the Development would not compromise the integrity of the Assynt-Coigach NSA, however the Development would have some adverse effect on special qualities of the NSA, namely "A landscape of vast open space and exposure" and "Significant tracts of wild land". SNH emphasises the significant adverse effects on the wild land resource in this area, and concludes the most significant impact of the Development on the NSA would be the reduction of peripheral wild land resource, altering perception of place within the eastern extent of the NSA. SNH considers that the conclusion by the Company that effects on the NSA will be 'not significant' in any part is not supported by the significant adverse visual impacts seen from viewpoints 10 and 23. These are both within the NSA and provide views across the eastern part of the NSA, as well as towards the wider area including the Development site. Ministers accept these conclusions on landscape and visual impact by SNH.

Wild Land

This Development sits within an area originally identified in 2002 by SNH as a Search Area for Wild Land (SAWL) and identified in 2014 as the Reay-Cassley Wild Land Area (WLA). SNH was consulted on the application, and further consulted following the publication of SPP 2014. The main factor behind SNH's objection to the proposal was that the Development would be sited within wild land and raises natural heritage issues of national interest in that it would cause significant adverse effects that penetrate into the core of what is now the Reay-Cassley WLA. The result of this would be a loss of a significant proportion of wild land and an adverse effect on the experience of much of the remainder. SNH further advised that the proposed site contributes to the overall integrity of the WLA, forming part of an extensive block of wild land that extends to the north west. SNH added that it does not consider that it is possible to significantly mitigate the impacts on the WLA. In respect of how the Development proposal relates to policies contained in the new SPP regarding wild land and National Scenic Areas, SNH clarified that it maintains its objection to the Development due to the significant adverse impacts on the Reay-Cassley WLA. The John Muir Trust and Mountaineering Council of Scotland share SNH's view of the impact of this proposal on wild land and further maintained their objections following the publication of the SPP in 2014.

The Company has undertaken its assessment of the impact of the Development upon wild land. Ministers note the Company's assessment that not all parts of the WLA are of the highest wild land qualities and the Company's comment that the areas affected by the Development lie in the south-eastern part of the WLA, which the Company says does not in general contain the highest levels of wildness physical attributes, with the best areas of wild land lying further to the west. The Company contends that the areas of the WLA with the best quality of wild land would not be affected, as the Development would be sited in the south-eastern part of the WLA. However, Ministers consider there would be a significant adverse impact on an area covering much of the south east of the Reay-Cassley WLA. The Development

would have significant adverse effects on the south eastern segment of the Reay-Cassley WLA to the degree that this area of the WLA would no longer be considered to be wild land. This in turn means that the Development would still have a significant effect on the Reay-Cassley WLA when considered as a whole.

Ministers note SNH advise that "the presence of Rosehall and Achany introduces wind farms into the wider area. There is a separation of approximately 4.5 km between Glencassley and Achany/Rosehall turbines, at the closest point. Although some peripheral attrition of wild land characteristics of the SAWL has resulted from the Rosehall and Achany wind farms, these are located out with the SAWL and have notably lower visibility across the SAWL. In contrast, Glencassley would introduce tall moving structures into an area of high wildness that is currently free from such development. The proximity of the proposed Glencassley development, combined with its larger extent of visibility, produces a much greater impact upon the SAWL than Rosehall and Achany." SNH were also further invited to provide views on how the Development proposal related to policies contained in the new SPP (published in 2014) regarding wild land and National Scenic Areas. SNH responded that it concluded that the Development does not comply with the relevant policy tests in the new SPP for wild land and maintained its objection due to the significant adverse impacts on wild land, now identified as the Reay-Cassley WLA.

The Company held the opinion that the main impact of the wind farm would be to diminish the buffer between areas of development and the true areas of wild land. The Company believe a degree of fragmentation of the wild land qualities has already occurred, in that the wild land is affected by the Achany and Rosehall wind farm developments. The Company made further representation in October 2014 in response to the publication of the SPP in 2014 and concluded the Reay-Cassley WLA has the landscape capacity to accommodate the proposed Development. Furthermore the Company added that any effects on the qualities of the wildness in the WLA had been overcome by the siting and design principles embedded in the iterative design and environmental impact assessment approach.

Although Ministers note the assessment by the Company, SNH concludes that the Development would have significant adverse effects on the Reay-Cassley WLA, and that it has not been demonstrated that these can be substantially overcome by siting, design or other mitigation. SNH does not consider that these effects can be avoided due to the nature and location of the proposed developments within the WLA. SNH concludes that the Development does not comply with the relevant policy tests in SPP for wild land. Ministers accept these conclusions by SNH.

Although Scottish Ministers' policy envisages that wind farms on wild land may be appropriate in some circumstances, where it can be demonstrated that significant effects on the qualities of the area of wild land can be substantially overcome by siting, design or other mitigation, Ministers have concluded, with respect to this Development, that the wild land impacts are unacceptable and cannot be mitigated. The effects on the qualities of the wild land area have not been reduced to a degree sufficient to make the Development consistent with the approach on spatial frameworks set out in SPP.

Environmental Benefits and Carbon Payback

The total annual CO_2 saving from the wind farm was estimated by the Company to be:

- 171,585 tonnes of CO_2 per year saved per year over coal-fired electricity,

or

- 85,793 tonnes of CO_2 per year saved per year over grid-mix supply

or

- 121,107 tonnes of CO_2 per year saved per year over fossil fuel mix

The Company's calculation of the time required for the Development to generate enough carbon-free electricity to offset its own carbon footprint (known as the CO_2 payback period), was calculated as between 1.0 to 2.1 years. Ministers agree that the proposal would help to reduce carbon emissions to a sufficiently appreciable degree. As a result, the wind farm would be supported in principle by the relevant parts of national legislation and policy, to which it could make a valuable contribution.

Economic impact and Renewable Energy Benefits (including Tourism)

Scottish Ministers aim to achieve a thriving renewables industry in Scotland. The focus being to enhance Scotland's manufacturing capacity, to develop new indigenous industries, particularly in rural areas, and to provide significant export opportunities. Ministers have considered material details of how this proposal can contribute to local or national economic development priorities as stated in Scottish Planning Policy (SPP).

The proposed project would have the capacity to increase the amount of renewable energy produced in Scotland and would be consistent with the Government's policy on the promotion of renewable energy. The installed wind capacity of 78MW is estimated to annually provide equivalent energy to the electrical demand of approximately 36,816 homes.

Ministers recognise this increase in the amount of renewable energy produced is entirely consistent with the Scottish Government's Policy on the promotion of renewable energy and its target for renewable sources to generate the equivalent of 100% of Scotland's annual electricity demand by 2020. It is also consistent with Climate Change objectives.

Ministers note the economic impact figures provided by the Company are estimates, and agree the Development is likely to have some positive socio-economic effects.

Gross Value Added

In the ES the Company conducted an assessment of the socio-economic impact of the proposal based on estimates on procurement and expenditure on goods and services. This assessment suggests that between £29 - £49 million of Gross Value Added (GVA) would be generated within The Highland Council boundary area over the lifetime of the Development.

The Company added the wind farm would provide opportunities for local employment and supply chain benefits. It stated that "The proposed Glencassley wind farm would provide opportunities for local employment and supply-chain benefits in construction and ongoing operations in an area that is currently underperforming economically, and is highly dependent on public sector and accommodation/food economic activity. The annual GVA of an estimated £0.9m and £1.4m, much of which would stay within the Sutherland area therefore represents important economic benefits to the functional area surrounding the site."

Employment

The assessment undertaken by the Company indicated that the wind farm would support between 137 and 398 job years of employment in the study area across its lifetime, as well as 389-973 job years of employment in Scotland as a whole. In the ES, the Company states the level of employment would be at its highest in the construction phase, with up to 101 job years supported in The Highland Council boundary (the study area).

Tourism

The tourism sector in the Highlands is very important, Ministers have considered any potential for negative economic impacts that might result from the impact of the Development on tourism. Ministers note The Mountaineering Council and John Muir Trust's views, however Ministers accept the findings of the ES on this issue. This identifies several key tourist attractions in the area in and around the application site, but given the limited number of attractions and accommodation providers that appear to fall within the visual area of influence, the magnitude of effects was judged to be low. Ministers have therefore concluded that impacts are unlikely to be significant.

Public Representations

90 public representations were received; 78 objections and 12 in support with the vast majority of the representations received from the local community. The objection reasons covered a range of issues relating to location, visual impact, cumulative impact local economy, environment, wildlife, pollution, against local policy and inadequate public consultation and a request for a PLI. The representations in support which included Port of Inverness and Wind Towers Scotland, outlined views of good for local economy, clean form of energy, general support and good location.

Two neighbouring estates, the Merkland Estate and Reay Forest Estate which lie north and north west of the proposed wind farm site, raised objections through their representative CKD Galbraith, stating the Development is contrary to the development plan in relation to its landscape and visual impacts and impacts on wild land, peat and some protected species. These Estates requested that the Minister use his power to refer the application to a PLI. In their objection they were highly critical of the Highland Council North Planning Committees approach to recent Highland wind farms decisions especially where wild land was a key determining issue. A summary of the representations can be found at Annex 2.

Summary of Scottish Ministers' Considerations

The Scottish Ministers have deliberated fully and carefully matters raised in representations, statutory and non-statutory consultee responses as well as the Environmental Statement, and have considered the impacts of the Development, and the degree to which these can be mitigated.

Ministers have given particular regard to the impacts this Development would have on wild land and on the NSA and have considered these in the context of policies within SPP as whole, including both the economic benefits to a remote and fragile rural economy and the renewable energy benefits that the Development would bring.

Whilst Ministers are satisfied that many of the environmental issues have been appropriately addressed by way of the design of the proposal and mitigation, the impacts which remain, most particularly in respect of the impacts of the Development on the NSA and on wild land, are not acceptable and are not outweighed by any wider policy benefit. Scottish Ministers consider that the balance is not in favour of the Development, and consent under section 36 of the Electricity Act 1989 is therefore refused.

The Scottish Ministers' Determination

Scottish Ministers refuse the application for consent under section 36 of the Electricity Act 1989 for construction and operation of the Development.

In accordance with the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2000, the Company must publicise this determination for two successive weeks in the Edinburgh Gazette and one or more newspapers circulating in the locality in which the land to which the Application relates is situated.

Copies of this letter have been sent to the Planning Authority. This letter has also been published on the Scottish Government Energy Consents website.

The Scottish Ministers' decision is final, subject to the right of any aggrieved person to apply to the Court of Session for judicial review. Judicial review is the mechanism by which the Court of Session supervises the exercise of administrative functions, including how the Scottish Ministers exercise their statutory function to determine Applications for consent. The rules relating to the judicial review process can be found on the website of the Scottish Courts – http://www.scotcourts.gov.uk/session/rules/print/rules/CHAP58.pdf. Your local Citizens' Advice Bureau or your solicitor will be able to advise you about the applicable procedures.

Yours sincerely

[redacted]

Sue Kearns
Head of Local Energy and Consents
A member of the staff of the Scottish Ministers

ANNEX 1
SUMMARY OF CONSULTATION

Statutory Consultation Exercise

The Highland Council, (a statutory consultee) as a Planning Authority formally responded on the 28 May 2013 raising no objection:

- **subject to following the recommendation set out in the Council's report that turbines No 1, No 2 and No 3 were removed from the proposed scheme, to reduce visual impacts as viewed from the north. The Company agreed with the council's recommendation.**

The Highland Council in their conclusions stated the application site falls within an "area of search" within the noted Interim Supplementary Guidance on onshore wind energy. Determination of the application relied principally on provisions of Policy 67 of the Highland Wide Local Development Plan (HwLDP) to consider the likely impacts of the Development on a number of criteria to ascertain if the Development is overall detrimental to the landscape individually or cumulatively with other developments.

The Highland Council found the Development to be acceptable of most of the criteria of Policy 67, except two where adverse impact was identified in relation to landscape and visual impacts and amenity at sensitive locations. However the Council concluded the application is one that can be seen as being located and sited such that it will not significantly be detrimental overall, either individually or cumulatively with other operation developments, therefore accords with the policies of the Council Development Plan.

The assessment of impact on wild land as presented by the Company was accepted by the council.

The Highland council concluded that the Development on balance should be supported, should the application not be amended in line with their recommendations The Highland Council would raise an objection for reasons founded on Policy 67 of the HwLDP and particularly the tests of landscape and visual impact as viewed from the North.

The Highland Council were further invited to make representation on the new Scottish Planning Policy (SPP), published on 23 June 2014, in particular on views they may have on how the Development proposal related to policies contained in the new SPP regarding wild land and National Scenic Areas. The Highland Council did not respond to add to or amend its initial consultation response to the Scottish Government on the application.

SEPA raised no objection and welcomed the draft Construction Environment Plan (CEMP). SEPA recommended that no turbines be sited on any area of deep peat, however, required that attention must be paid to the track crossing between turbines. Furthermore, SEPA required that there must be an updated and approved Construction and Environmental Management Document (CEMD), incorporating a

finalised Habitat Management Plan. Also, that a 50m buffer (Exclusion Zone) of development from watercourses and a Decommissioning and Restoration plan be submitted. A specific condition was requested in relation to a Decommissioning and Final site restoration plan which must be submitted at least two years prior to the end of the design life of the Development.

SEPA requested further information and clarification in relation to the Company's Carbon payback figure. The Company supplied this therefore SEPA confirmed they have sufficient confidence in the figure for it to be used by Scottish Ministers as a consideration.

When invited to make representation on the new SPP, SEPA confirmed that wild land and National Scenic Areas did not fall within their remit and offered no comments in relation to these specific issues.

SNH objected stating the proposal would have significant adverse effect on the Search Area for Wild Land (SAWL) now identified as the Reay-Cassley WLA and that it is not possible to mitigate these impacts. When considered cumulatively with Sallachy Wind farm application SNH said these concerns are exacerbated, adding that the proposed site contributes to the overall integrity of the WLA forming part of an extensive block of wild land that extends to the north-west. SNH went on to say that if consented this would result in a loss of a significant proportion of the wild land, and adversely affect the remainder of the rest therefore SNH considered these impacts do not meet the objectives of Scottish Planning Policy. Wild land resource is considered important for the national interest and has been determined by research and mapping carried out by SNH. SNH objected to the principle of a wind farm in this location.

SNH was also subsequently invited to make representation on the new Scottish Planning Policy (SPP) to provide views on how the Development proposal related to policies contained in the new SPP regarding wild land and National Scenic Areas. SNH responded that it concluded that the Development does not comply with the relevant policy tests in the new SPP for wild land and maintained its objection due to the significant adverse impacts on wild land, now identified as the Reay-Cassley WLA.

SNH was concerned with impacts on Otter and Blanket bog qualifying interests of the Caithness & Sutherland Peatlands SPA and SAC. Pollution and sediment impacts may also have a detrimental effect on salmon and pearl mussel stock in the River Oykel SPA. The proposal raises natural heritage issues of national interest and SNH said it would object to this proposal unless it was made subject conditions to ensure the proposal will not adversely affect the integrity of the above sites.

SNH indicated that the Scottish Government is required to complete an appropriate assessment for the River Oykel SAC, Caithness and Sutherland SAC and Caithness and Sutherland SPA. These concluded that there would not be an adverse effect on the integrity of both SACs and the SPA and Ramsar site, subject to the imposition of conditions as recommended by SNH.

Ardgay & District Community Council had no comment. It did not respond with any views on the introduction of the new SPP and the NPF3.

Atkins Global raised no objection and did not respond with any views on the introduction of the new SPP and the NPF3.

BT raised no objection and did not respond with any views on the introduction of the new SPP and the NPF3.

Crown Estate raised no objection and did not respond with any views on the introduction of the new SPP and the NPF3.

Civil Aviation Authority (CAA) raised no objection. No request was made for turbines to be lit but the Company would need to inform Defence Geographic Centre of locations, heights, and lighting status and masts, actual dates of construction, equipment height to allow inclusion on aviation charts. The CAA did not respond with any views on the introduction of the new SPP and the NPF3.

Defence Estates (MOD) raised no objection but requested standard planning conditions requiring notification on development commencement and final design information. It did not respond with any views on the introduction of the new SPP and the NPF3.

Forestry Commission Scotland – raised no objection, as there would be a limited amount of woodland removal. It stated a requirement for replacement planting to be secured with any habitat management plan. It did not respond with any views on the introduction of the new SPP and the NPF3.

Halcrow (Scottish Government's peat slide risk assessor) – raised no objection and stated that the ES provided a sufficient assessment of peat landslide risk at this site. Some recommendations were to be attached to assist with the final design and site specific conditions to be applied to any consent. Halcrow did not respond with any views on the introduction of the new SPP and the NPF3.

Highlands and Islands Airports Limited (HIAL) raised no objection - confirming the Development would not infringe the safeguarding surface for Inverness and Wick Airports. It did not respond with any views on the introduction of the new SPP and the NPF3.

Historic Scotland raised no objection but noted an adverse impact upon the setting of Creich, Broch but not to the extent to warrant an objection. It confirmed that they had no further comment to make on the introduction of the new SPP and NPF3.

JRC (Radio Planning Services for Utility Companies) raised no objection unless details of windfarm change such as the scale of the turbines. It did not respond with any views on the introduction of the new SPP and the NPF3.

John Muir Trust (JMT) raised an objection. It stated that The Trust does not believe that the application sufficiently addresses the requirements of either the National

Planning Framework for Scotland (NPF2) or Scottish Planning Policy (SPP) with regards to the sensitivity of the landscape to accept the level of change proposed.

JMT submitted a supplementary note to their original objection upon the publication of the new SPP and the NPF3 stating that the proposal to construct a wind farm in this location is totally contrary to the policy and principles stated in NPF3 and SPP2 and permission to build should be refused.

Kyle of Sutherland District Salmon Fisheries Board raised no objection but raised concern over sediment issues concurrent with and post construction. Concerns were regarding peat slides and chemical spill therefore requested all machinery fluids and fuels be stored safely. It did not respond with any views on the introduction of the new SPP and the NPF3.

Lairg Community Council raised no objection following the introduction of the new SPP and NPF3 advising that it was in line with SPP.

Marine Scotland raised no objection. A request was made for a planning condition to secure an appropriate fish and water quality monitoring programme, this should address the potential cumulative effects of other proposed wind farms and forestry works and Loch Shin hydropower scheme in relation to hydrological/ hydro-chemical and fisheries issues. It did not respond with any views on the introduction of the new SPP and the NPF3.

Mountaineering Council of Scotland raised an objection due to an adverse visual impact the proposed Development may have on this remote upland mountain area. It held that cumulative effect would be unacceptable given landscape designations; there would be impact on Tourism and it wished a moratorium on wind farms; and that the Development does not comply with development plan. It stated the proposal would be located on wild land with adverse visual impact over long distances towards and from the National Scenic area which include Munros and Corbetts. It did not respond with any views on the introduction of the new SPP and the NPF3.

NATS safeguarding raised no objection and did not respond with any views on the introduction of the new SPP and the NPF3.

OFCOM raised no objection as no fixed links identified and did not respond with any views on the introduction of the new SPP and the NPF3.

RSPB raised no objection, subject to the provision of a habitat management plan to incorporate mitigation in relation to golden eagles and golden plover. It noted the new SPP affords a greater importance to peatlands in any consideration of wind farm proposals, by comparison with its predecessor. It recommended a peatland enhancement management plan by condition (or planning obligation if outwith the Development site) if the proposal were to be consented.

Transport Scotland raised no objection, although requested conditions to be attached to any consent to help maintain the safety of the trunk road network, when traffic works and particularly abnormal traffic movements take place. It did not respond with any views on the introduction of the new SPP and the NPF3.

The British Horse Society raised no objection as equestrian usage in the area is minimal. It did not respond with any views on the introduction of the new SPP and the NPF3.

The following bodies had no objections/no comments: Scottish Water, Scottish Rights of Way and Access Society (Scotways), UHF Radio Scanning Telemetry.

ANNEX 2
GLENCASSLEY WIND FARM – PUBLIC REPRESENTATIONS

Total number of representations – 90

Number of Objections - 78

Reason for objection	Total
Location	58
Designated, Protected, Archaeological & Heritage Site	43
Visual Impact	36
Cumulative Impact	19
Local Economy	29
Environment	23
Wildlife	23
Pollution	12
Other Distributions	4
Inefficient	3
Other Forms of Energy	1
Against Local Planning Policy	3
Inadequate Public Consultation	2
Health and Safety	1

Number of Support – 12

Reason for support	Total
Good Location	2
Good for Local Economy	10
A Clean form of Energy	7
General Support	1

APPENDIX 2: EIA REPORT FIGURE 3.1: THE PROPOSED DEVELOPMENT

sse Renewables

Key

- Site Boundary
- Turbine
- LiDAR
- Floated Track
- Founded/Cut Track
- Existing Track to be Upgraded
- Hardstanding
- Borrow Pit
- Temporary Construction Compound, Security, Storage and Batching Plant
- Extension to Existing Operations Building
- Substation, Welfare Facility and Store
- Temporary Construction Compound, Security and Storage

Figure 3.1a

Figure 3.1b

Figure 3.1c

Figure 3.1d

Scale 1:40,000 @ A3

0 1 2 Km

N

Figure 3.1
The Proposed Development

Achany Extension Wind Farm
EIA Report

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

Scale 1:20,000 @ A3

0 0.5 1 Km

N

Figure 3.1a
The Proposed Development

Achany Extension Wind Farm
EIA Report

sse Renewables

Key

- Site Boundary
- Turbine
- Floated Track
- Founded/Cut Track
- Existing Track to be Upgraded
- Hardstanding
- Borrow Pit

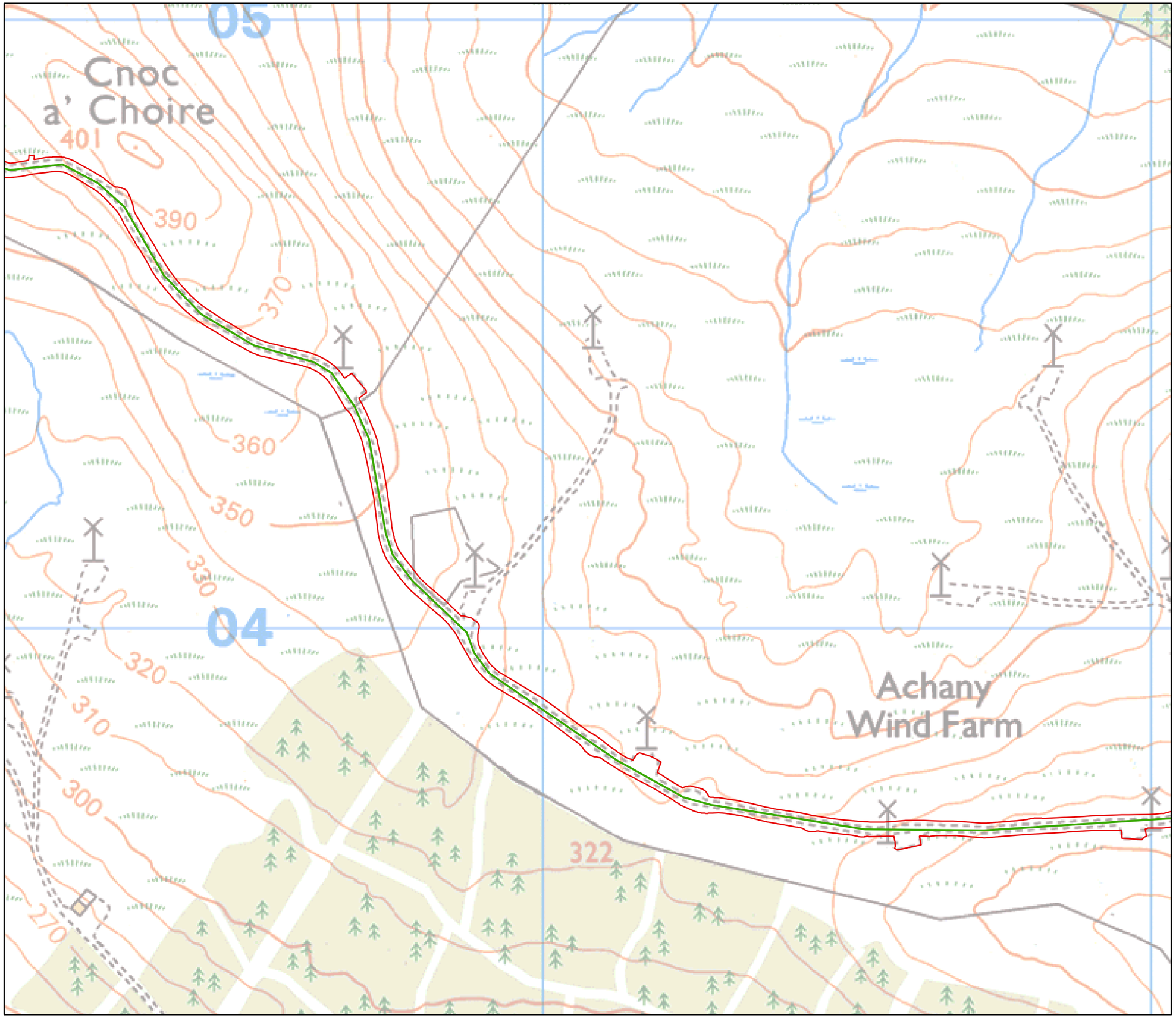
Scale 1:10,000 @ A3

0 0.25 0.5 Km

N

Figure 3.1b
The Proposed Development

Achany Extension Wind Farm
EIA Report



sse Renewables

Key

- Site Boundary
- Existing Track To Be Upgraded

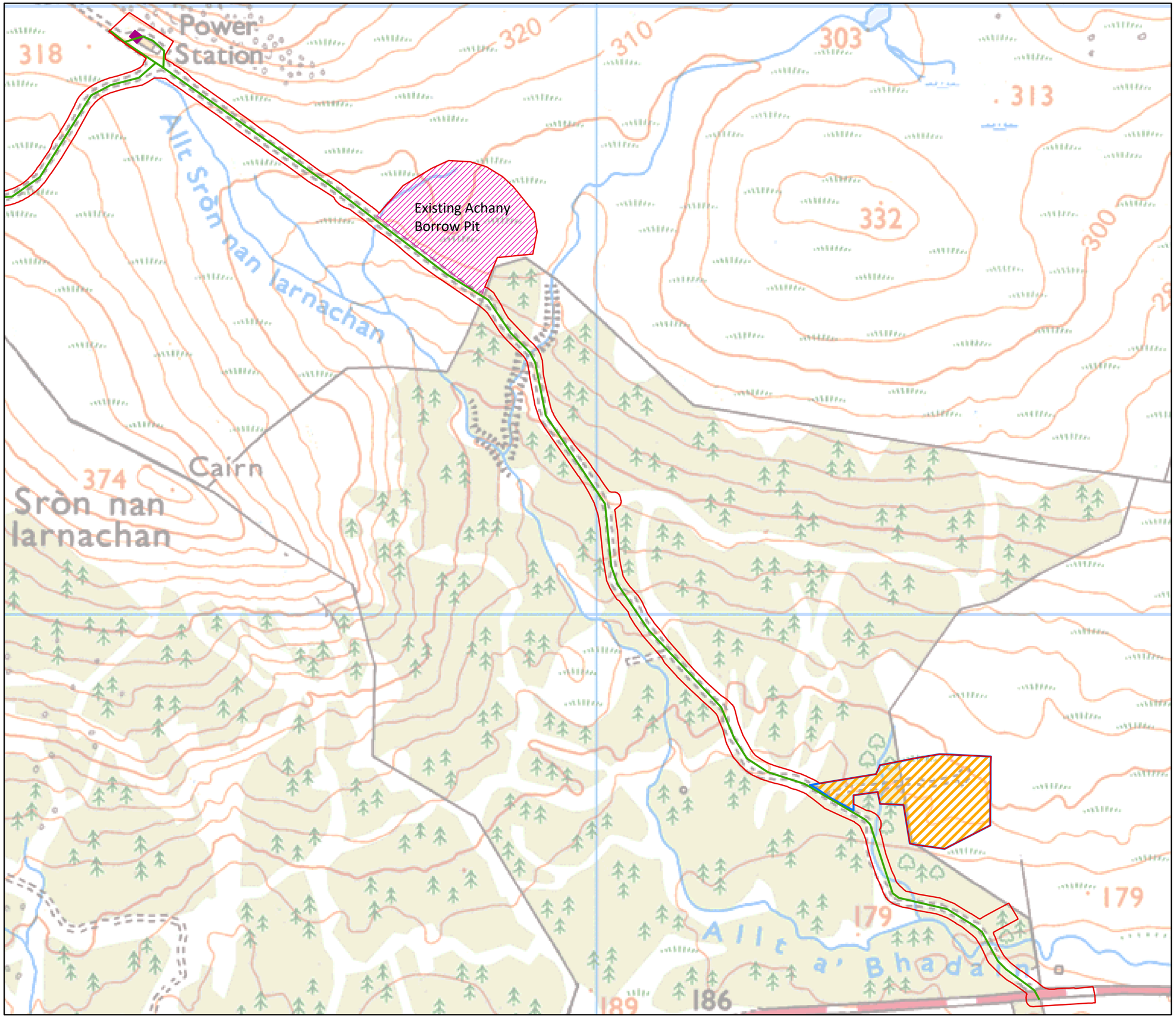
Scale 1:6,000 @ A3

0 0.15 0.3 Km

N

Figure 3.1c
The Proposed Development

Achany Extension Wind Farm
EIA Report



sse Renewables

Key

- Site Boundary
- Existing Track To Be Upgraded
- Borrow Pit
- Extension To Existing Operations Building
- Temporary Construction Compound, Security And Storage

Scale 1:6,000 @ A3

0 0.15 0.3 Km

N

Figure 3.1d
The Proposed Development

Achany Extension Wind Farm
EIA Report