

By email to: Econsents_Admin@gov.scot;

and: Nicola.Soave@gov.scot

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Dear Ms Soave

Glencassley Windfarm, near Lairg, Sutherland

Reference: ECU00001930

SSE Renewables has submitted an EIA Scoping Report for a potential wind farm at Glencassley, Lairg, Sutherland. There is no indicative layout or number of turbines. Turbines in excess of 150m BTH would be used. The site is mostly between 250 and 400m, with one area dropping towards 200m and another exceeding 450m. It can be expected, regardless of precise siting, that the proposed turbines would be the highest features on the ridge, which culminates c.10km to the northwest at Maovally (512m OD).

Previous applications for wind farms at Glencassley (23 x 126.5m) and Sallachy (22 x 125m), further NW along the same broad ridge, were both refused by Scottish Ministers in November 2015. The determining factor was visual impact on the Assynt-Coigach NSA and the Reay-Cassley Wild Land Area (WLA).

This new scoping shows the northwest boundary of the proposed development area drawn back <3km from the previous boundary. The now-proposed development area is still almost entirely within the WLA. There may be a gain in topographic screening from the withdrawal southwards but that may be negated by increased turbine height.

The Scoping Report suggests that a revised application for Sallachy may be submitted before the end of 2019. This also seems likely to be wholly within the WLA. If this is so, it would make any claimed benefit from the withdrawal southwards of the northern development boundary of Glencassley fanciful.

The main part of the proposed site is <4 km NW of the operational Achany and Rosehall wind farms, which appear as one, with 19 turbines of 100m BTH and 19 of 90m BTH, respectively. There is a tongue of land stretching south from the main development area to abut Achany/Rosehall: this may just be a broad transport corridor or a line of turbines may be planned. There are a range of other consented, application and scoping wind farms around Lairg, to which Mountaineering Scotland has not objected. It objected to Glencassley and Sallachy in their original forms and to Caplich, west of Glencassley, which was refused in in April 2018 because of its impact on wild land. In addition we

objected to the Creag Riabhach wind farm, to the north of the Lairg basin, which was consented by ministers in October 2016 without a PLI despite SNH objection on wild land grounds, and is currently under construction.

Mountaineering Scotland has reviewed the Scoping Report from the perspective of its members' interests and has the following observations.

1. Given the revisiting of a location to which Mountaineering Scotland previously objected, and the potential for a complete rerun of the position in the first half of this decade if Sallachy also resubmits, our members' interests are most certainly engaged. The impact on the experience of Ben More Assynt will be primary but there are many other hills that could be impacted, especially given the intrusion of Creag Riabhach into many angles of view previously without turbines in near proximity.
2. It is difficult to see how a minor withdrawal southward would overcome the previous Ministerial decision, especially if a Sallachy resubmission also proceeds simultaneously. An application would need to demonstrate that this site specifically is required to meet electricity generation needs.
3. An application is likely to raise many of the same visual impact concerns as the previous application. An explicit comparison with the previous application is required to demonstrate to what extent previous concerns (and reasons for refusal) remain applicable and to what extent they have been overcome.
4. The proposed 'detailed study area' of 15-20km is too small (p.17). It could exclude Creag Riabhach, Ben Hee and Seana Bhraigh, all of which are likely to have clear views of the proposed development at distances of <25km. A detailed study area radius of not less than 25km is requested.
5. While we agree that the primary focus for wild land assessment requires to be the Reay-Cassley WLA, and are not unsympathetic to the idea that significant effects on other WLAs may be limited, this needs to be demonstrated not simply asserted (p.18).
6. The proposed viewpoints are acceptable except that we do not agree with the omission of Viewpoint 18. It does not matter if it is the same (mobile) receptors: it is from a different location at a different angle and distance to the proposed development. Furthermore, it seems possible that the proposed development will not be seen 'through' the existing windfarms, as is claimed, but as a lateral extension to them – a very different prospect.
7. We note that the proposal to present only a wireline for Ben Hee (which is not in itself unacceptable since photomontages, and their baseline photography, became increasingly misleading with distance) is based on an assumption of lack of significant impact justified solely by distance without regard to context or scale of development. We expect the LVIA itself to be less simplistic in its approach.

Yours sincerely



Davie Black
Access & Conservation Officer
Mountaineering Scotland