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The Scottish Government  
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20 August 2021

Dear Sir/Madam

**Achany Extension Wind Farm – S36 application for 20 wind turbines to 149.9m blade-tip height, on land at Glen Cassley, near Lairg.**

**ECU reference: ECU00001930**

### Introduction

1. SSE Renewables has applied for S.36 consent for Achany Extension wind farm, by Lairg, with 20 turbines of 149.9m blade-tip height. All turbines would be within the Reay-Cassley Wild Land Area.
2. The proposed development is similar to a previously refused application (Glencassley, refused 2015) but with the turbine area moved southwards by c.3km.
3. Mountaineering Scotland **objects** to the proposed wind farm on grounds of visual impact.

### Mountaineering Scotland

4. Mountaineering Scotland is a membership organisation with more than 14,000 members and is the only recognised representative organisation for hill walkers, climbers, mountaineers and ski-tourers who live in Scotland or who enjoy Scotland's mountains. We represent, support and promote Scottish mountaineering, and provide training and information to mountain users for safety, self-reliance and the enjoyment of our mountain environment.
5. Mountaineering Scotland agrees with the need to move to a low carbon economy but does not believe that this transition need be at the expense of Scotland's marvellous mountain landscapes. It objects only to the small proportion of proposals that are potentially most damaging to Scotland's widely-valued mountain assets, consistent with its policy set out in *Respecting Scotland's Mountains*. This has been strongly endorsed by its members and by kindred organisations such as The Cairngorms Campaign, North East Mountain Trust and The Munro Society.

## Material considerations

### Context

6. The application is presented as an extension to the applicant's operational Achany wind farm (19 turbines of 100m blade-tip height) which itself is adjacent to, and visually merges with, the operational Rosehall wind farm (19 x 90m BTH). It is no doubt being presented as an extension so as to benefit from support for wind farm extensions in the Onshore Wind Policy Statement (2017). However, the southernmost turbine of the proposed development is nearly 2km from the northernmost turbine of Achany, a gap which is very obvious on the ground. Furthermore, the straggling design of the proposed development fails to appear as an extension of the existing wind farm cluster but more something extruded from it.
7. The Planning Statement contains multiple references to how the proposed development would be seen "alongside but as a separate cluster to existing turbines" (p.3-42) or "close to the existing ... turbines but would almost always appear as a separate cluster (p.3-43) and how "It would usually be seen to form a separate wind farm cluster ... It is unlikely to be seen to form one large cluster with existing wind farms ..." (p.3-42 – 3-43). We contend that a genuine extension of the present cluster would have a stronger visual relationship with it and would appear as part of a single large cluster rather than as a straggling arm flung out from and somewhat disconnected from the existing cluster.
8. Achany was consented in 2006 and Rosehall in 2007, both well before Scottish Planning Policy in 2014 stated that "Areas identified for wind farms should be suitable for use in perpetuity (para 170). Unless SPP2014 is applied retrospectively, it cannot be assumed that the existing wind farm sites have been found suitable for use in perpetuity in contrast to the claim in the Planning Statement (para 2.4.42). Such suitability would need to be testing in the planning system with new applications for the existing wind farm sites.

### Policy

9. The turbines are drawn south within a red-lined site that, except for the removal of the northern area, is unchanged from the 2012 application red-line, except in minor detail. The application design is regarded by the applicant as "the most suitable development option for the site" (Planning Statement p.3-45). However, this begs the question as to the suitability of the site itself. There is no explanation in the EIA or the Planning Statement as to why the site boundary is unchanged.
10. The unacceptable visual impact of the proposed development could be substantially mitigated if the turbines were drawn further south still onto the slopes of and northwest from Coire Bog and turbines removed from Carn nam Bo Maola northwards. There may be reasons why this has not been considered or has been rejected by the applicant. They are not documented in the application. Instead, what we have is an attempt to design a commercially-viable wind farm on a predetermined site, the boundary of which was fixed a decade ago. The turbine footprint has been "pushed as far south as possible" (Planning Statement para 1.4.8) but only within the constraints of the applicant's predetermined site boundary. We consider that the applicant, by failing to reconsider the site boundary, has not undertaken its duty to do all that it reasonably can to mitigate the effects of the proposed development.
11. It is accepted that the level of government support for onshore wind is high. Even so the applicant feels the need to overstate it by misleadingly citing the Scotland Climate Change Plan December 2020 update ("Securing a Green Future ...") as referring to 'onshore wind' when every relevant reference is to 'onshore and offshore wind'. For example, the

applicant states: "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." (Para 6.4.20) while the Climate Change Plan Update states: "There will also be a substantial increase in renewable generation, particularly through new offshore and onshore wind capacity." (p.18). In every instance when the applicant refers only to onshore wind, the policy document refers to onshore *and offshore*, never onshore alone.

12. No policy or other official document issued since the political declaration of a climate emergency has suggested that the principle of 'the right development in the right place' has been abandoned or that the weight to be attached in the planning balance to energy policy relative to landscape protection has changed to such a degree as to make a site acceptable in policy terms if its landscape and visual impact is unacceptable.
13. While the NPF4 Position Statement has indicated an intention to update the Spatial Framework (not 'upgrade' as the applicant refers to it), what form this will take is currently speculation. The applicant – in line with lobbying by the renewables industry – would no doubt like to see any constraints on development in wild land removed. But it might alternatively be speculated that the update could increase protection for priority peatland, which would be unhelpful for the proposed development since it is wholly sited on Priority Peatland (Class 1 & 2) (Figure 11.4; Para 11.6.13).
14. We anticipate that NPF4 will support suitable developments. But the Position Statement has to be read with a wide focus as referring to the far-reaching changes needed across society, economy and land use (e.g. in housing or consumer behaviour). Not with a narrow focus that interprets every statement as offering direct support for onshore wind electricity generation. And to anticipate support for the proposed development from NPF4 is to assume that it is a suitable development. We do not believe that it is.
15. The applicant refers to the policy need to have 17 GW of renewables installed by 2030. We note that the latest statistics for Scotland show 20 GW operational, under construction and consented (Energy Statistics for Scotland: Q1 2021 Figures (June 2021)). We do not suggest that this means nothing further need be done. We quote the statistics simply to show that the planning system has responded very effectively to the 'needs case' to date and any attempt by the applicant to imply that the need to consent generation capacity is now so urgent that the existing planning regime is unfit for purpose is simply wrong.

### ***Visual assessment***

16. The LVIA is stated to have been carried out by assuming the 'worst case' scenario i.e. on a clear, bright day in winter, without haze. The baseline photography for the Viewpoints of interest to Mountaineering Scotland is, however, often hazy and sometimes very much lacking in clarity.
17. Our assessment is from a mountaineering perspective and only the seven hill viewpoints are considered (Viewpoints 5, 10, 13 & 18-21). Our assessment repeatedly found that the turbines upon the elevated ground around Carn nam Bo Maola and to its north had a substantial visual impact. The turbines further south had a lower impact but from some directions (e.g. VP13 and 18), where all or most of the turbines were in view, the straggling effect of the layout was evident. It was exacerbated by the gap between it and the existing cluster. The existing cluster is just under 5km on its longest axis. The proposed development is 5km long but with the gap, it would extend nearly 7km from the existing cluster, giving a combined length of 12km.

18. There is a striking sense of a straggling development, daisy-chaining from the existing cluster rather than integrating with it. Seen from elevated viewpoints, there is no clear sense of the turbines stopping at a perceivable 'natural' boundary and this exacerbates the sense of turbines spreading somewhat chaotically into the high moorlands between Glen Cassley and Loch Shin. The Planning Statement seeks to justify the proposed development by emphasising its location at the 'southern tip' of the Wild Land Area "where existing turbines and forestry already limit its [the WLA's] perceived extent" (1.4.9). We agree that these features *outside* the WLA serve to define visually where it stops, but we fail to understand how this offers any justification for putting turbines up to 5 km inside the WLA, striking 7km northwest from the present well-defined boundary between developed and wild land.
19. Indeed, our notes for specific viewpoints repeatedly flag up the straggle and incoherence of the proposed development as seen from higher elevations. For example, at Meall an Aonaich (Vp 21): "Again it is the straggle that is the main concern, lacking integration with existing Achany/Rosehall. The straggle is so lacking in coherence that one suspects it intentionally paves the way to further extensions." At Ben More Assynt (Vp 10), the proposed development is "Seen with Achany/Rosehall but because of the long straggle also seen as discordant with it." And "T[urbine]s on and N of CnBM [Carn nam Bo Maola] seem intrusive – a long finger without topographic rationale for stopping." At Carn Chuinneag (Vp 18):" Wireline shows width that Lairg 'cluster' is expanding to. Again, it's the perceived straggle that [the proposed development] introduces rather than its own impact that seems the key factor. No sense of consolidation or integration with prior pattern, just ever-expanding straggle."
20. The turbine base altitudes of all three neighbouring developments are in broadly the same range. The Planning Statement incorrectly states that the existing Achany/Rosehall cluster is at a slightly higher altitude (p.3-43). However, the larger turbines would result in the blades of the proposed development being the highest altitude features in the eastern 'lobster claw' of the WLA and comparable in height to the highest summit in the western 'lobster claw'.

	<b>Achany Extension</b>	<b>Achany</b>	<b>Rosehall</b>
Turbine base altitude range (m OD)	250-390	280-360	270-350
Maximum blade-tip altitude (m OD)	540	460	440

21. We are conscious that the adverse visual impacts we have identified are at distances of 12, 15, and 23-28km and that the planning system often discounts impacts at such distances. However, what is striking here is that these impacts would be experienced across a wide arc of hills covering about c.230 degrees. This shows the open nature of the Lairg basin and the visual reach of developments within it, as can already be seen with operational schemes from any of these Viewpoints or many other lower hills. The EIAR refers to "the surrounding mountains which provide extremely expansive, elevated views across the entire study area" (para 7.10.2). Good siting is paramount for effective mitigation. The size of the turbines, the elevation and scale of the proposed development, and the absence of any sense of physical containment or coherent relationship to the terrain combine with the openness of the Lairg basin to make the impact of the proposed development much greater than it need be were it better sited.
22. It is striking that the proposed development and the application Sallachy site, both with their turbines wholly within the WLA, provide complementary visual impacts in proximity to

viewers within the WLA such as to almost completely de-wild the eastern 'lobster claw' if both were to be consented. Such a substantial severing of a major limb of the WLA would not be consistent with maintaining the integrity of the WLA as a whole.

23. We note in passing some apparent errors in the EIAR.
  - a. Figure 7.8.2 does not include Creag Riabhach but work began on-site in summer 2020.
  - b. Both references to 'eastern parts' in para 7.8.16 cannot be correct.
  - c. 'North-east' in para 7.8.20 presumably should read north-west.
24. Summing up, our assessment of the potential impact of the proposed development leads us to the conclusion that the impact on the Assynt-Coigach NSA, Reay-Cassley WLA and the hill viewpoints is substantially understated in the EIAR. We do not agree that only 'very small areas' would experience 'localised' impacts. On the contrary, the openness of the local and wider area would interact with the straggling layout to adversely impact the mountaineering experience across a wide area.

### ***Socio-economics***

25. The majority of wind farms have no impact on tourism and recreation; that is not the case here.
26. The applicant cites the usual range of dated and/or inadequate research used by most applicants. This includes irrelevant general population surveys on attitudes towards renewable energy. Our members are strongly in favour of renewable energy: that does not mean they support an individual badly sited wind farm.
27. Mountaineering Scotland takes a careful approach to the assessment of tourism and recreation impact, specific to the landscape around a proposed development and informed by knowledge of the local context and of the specific segment of the tourism and recreation market most at risk from poor-quality farm developments: hill-walkers and other landscape-oriented visitors. In areas of high landscape quality visited by tourists attracted specifically by such quality, there is the potential for harm to tourism and recreation. Research on behalf of Mountaineering Scotland has shown that the introduction of wind farms in areas of Scotland designated for their landscape quality has been associated with a decrease in local tourism-related employment.
28. To some extent an impact on tourism and recreation is 'priced in' to consideration of planning applications since most refusals are because of landscape and visual (including wild land) impacts at proposed sites where tourists and recreationists would be amongst those particularly experiencing such impact. However, the reason given for refusal is 'landscape and visual (and wild land) impact' rather than 'tourism and recreation impact'.
29. The evidence that there is an impact on tourism and recreation from wind farms is weak. The evidence for there being no impact is even weaker. In the absence of robust independently-conducted research, all that the planning system can do is give appropriate weight to the landscape and visual context and impacts that can trigger a tourism and recreation impact.

## Conclusion

30. Mountaineering Scotland **objects** to the proposed Achany Extension wind farm on grounds of visual impact and the consequences therefrom.

Yours sincerely

A handwritten signature in black ink that reads "Stuart Younie". The signature is written in a cursive, flowing style.

**Stuart Younie**

**CEO, Mountaineering Scotland**

