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26 August 2021

Dear Sir/Madam,

### **Letter of objection regarding Achany Extension Wind Farm ECU00001930**

#### **Introduction**

1. The John Muir Trust strongly recognises that we are in a climate emergency, that onshore wind has already had an important role in the decarbonisation of Scotland's power sector, and that the UK requires more renewable energy to decarbonise other sectors. As a wild land conservation charity, our remit includes the protection of wild places, which we consider as having the potential to slow the rate of climate change and biodiversity loss through land management and restoration. Given this proposal is sited in a Wild Land Area, an area representing the most extensive areas of high wildness in Scotland, we are responding on wild land grounds. We are also responding on grounds of impact to nationally important peatlands. The Trust knows this area and the surrounding landscape as the land manager of nearby Quinag in the Coigach and Assynt National Scenic Area and through our involvement during the past five years in the Coigach and Assynt Living Landscape Partnership. We expect the proposed development would be visible from the Quinag mountain range, affecting views from this mountain range towards Ben More Assynt and the Reay-Cassley Wild Land Area. After having looked closely at the plans, we strongly object to what is being proposed.
2. We understand that the proposed development is on the same estate and on a site that overlaps with the site of the previously refused application for 'Glencassley' wind farm. Whilst each application is assessed on its own merits, we consider the reasoning within the 2015 decision of Scottish Ministers to refuse the then application for 'Glencassley' should be kept in mind when considering the present proposal. The Third National Planning Framework (NPF3) and Scottish Planning Policy 2 (SPP2) that guided that decision at that time has not changed, whilst facts pertaining to this proposal - such as the siting of turbines in a landscape of high value (referenced at paragraph 1.2.2 Volume 2, Chapter 1), as well as the large scale, extent and duration of the development proposed (the proposal is to double the number of turbines comprising the existing Achany wind farm) - remain incompatible with its siting in wild land and the high landscape value of the area.

## High Landscape Value

3. The landscape surrounding the proposed development site is recognised as being of high landscape value. All three indicators of high value (outlined in the table at paragraph 7.5.7 of the Landscape and Visual Impact Assessment (LVIA)) apply to the landscape of and around the proposed site. First, the landscape is closely associated with features of international or national importance which are rare within the wider national context. The landscape is closely associated with wild land, which is of national importance, as recognised in NPF3 and SPP2. Second, the landscape is of high scenic quality. This is evidenced by designated landscapes in every direction from the proposed site (Coigach and Assynt NSA to the north-west; Foinaven-Ben Hee WLA to the north; Ben Klibreck and Loch Choire Special Landscape Area (SLA) to the north-east; Fannichs, Beinn Dearg and Glencalvie SLA to the south; Inverpolly Glencanisp WLA and Rhiddoroch-Beinn Dearg-Ben Wyvis WLA both to the west) (see Figure 7.2.1, Volume 3). The surrounding designations are experienced from within the Wild Land Area as wide ranging views over extensive areas of mountain, moorlands and lochs and contribute to the landscape's scenic quality. Third, the landscape as an example of a scarce resource in a local context. Wild land is a mapped, nationally scarce resource in Scotland that is subject to planning constraints. Within the local context this resource is important for its scenic quality, recreational opportunities and cultural heritage associations. These associations help to attract visitors to the area – nearby Lairg is a popular destination for people seeking out experiences in the hills, in nature, as holiday makers and anglers. In a landscape of relatively high landscape value such as this, even small changes can result in very intensive change. However, the scale of the proposed plans and their effect in combination with existing infrastructure, is not a small change; it would amount to a very intensive change in an area that has been recognised as being of national importance.

## Direct impacts on Wild Land

4. In addition to being sited within a landscape of high landscape value, the proposed development is sited in a recognised '*area of significant protection*' (SPP2, paragraph 166). Wild Land Areas are mapped areas of national importance '*which are very sensitive to any form of intrusive human activity and have little or no capacity to accept new development.*' (Paragraph 200 of SPP2). As such, under SPP2, they are afforded some protection from onshore wind development, which may be appropriate, '*in some circumstances*' (SPP2, Table 1). It is for the applicant '*to demonstrate that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation*' (SPP2, Table 1 and paragraph 215). This wording is mirrored by the Highland Council's Onshore Wind Energy Supplementary Guidance November 2016 (with addendum December 2017) which states onshore wind within Wild Land Areas '*are unlikely to be supported unless it can be demonstrated that significant effects on the qualities of these areas can be substantially overcome by siting, design and other mitigation.*' In our submission, the effects on the wild qualities of the Wild Land Area would be significant and the Applicant has not demonstrated that these can be substantially overcome.
5. In their guidance for assessing impacts on Wild Land Areas (published December 2020), NatureScot states '*Where effects are identified that result in a material change in the experience of any of the wild land qualities, this is considered to be significant.*' The wild land

qualities of the Reay-Cassley Wild Land Area include the quality *'Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains'*. It follows logically from the siting of the development, physically, on the peatland slopes, and what that means in terms of construction – the excavation, disruption and re-structuring of the land – that there is a certainty about the material change in the experience of this quality. In this respect the LVIA misleads the reader in use of the word *'potential'* to describe the localised significant effect at paragraph 7.1.5. The effects would amount to a material change, they would *'directly affect and characterise this location'* (Table 4.2.4, summary of impacts at Location 1, Wild Land Area Impact Assessment, Volume 4, Technical Appendix 7.5). They would be certain, and they would also be significant in their nature, extent and duration – introducing new construction and a new land use that would replace the peatland slopes and the natural simplicity of the land.

6. According to the LVIA assessment, the significant effects of the proposed development on the strength of wildness within the Reay-Cassley Wild Land Area would arise within a localised area to the east and west of Glen Cassley and possibly affect some parts at the southern extremity of the mountain core (see paragraph 7.1.5 of the LVIA). The Wild Land Area (WLA) Impact Assessment recognises a *'localised significant effect'* (paragraph 4.4.7, Volume 4, Technical Appendix 7.5, WLA Impact Assessment) to the extensive peatland slopes wild quality. However, whilst effects on this quality would be significant, we dispute that significant effects would be localised in their extent given the effects the proposal would have on 1) viewpoints outside the WLA, 2) the perceived expansiveness of wild land and 3) the other qualities of the WLA, particularly, the quality of a *'variety of spaces created by irregular landforms in which there is perceived naturalness, as well as a strong sense of sanctuary and solitude'* (SNH Reay-Cassley WLA description). The WLA qualities relate to each other, affecting one can affect others, and this is true for the simple elevated slopes of the south of the WLA and the broad plateaus of peatland, which contrast with the more mountainous landform of the north west of the WLA, adding to the quality of a *'variety of spaces'*, *'irregular landforms'* and overall *'perceived naturalness'*.
7. Even if the impacts were considered to be localised and limited to one key quality of the Wild Land Area, this does not detract from their significance: *'impacts on qualities that affect only a geographically limited part of the WLA are still capable of resulting in significant effects'* (NatureScot's WLA Impact Assessment Guidance, December 2020). The magnitude of change can also still be 'high' when the change is localised but intensive. A high magnitude of change being defined as *'Notable change in landscape characteristics over an extensive area ranging to a very intensive change over a more limited area'* (paragraph 7.5.13 of the LVIA).
8. In evaluating the proposed development we should not lose sight of the fact, nationally, the proposed site for development represents the top 10% wild land for all of Scotland. The influence of some existing human features which were present at the time the area was mapped does not detract from that. The Wild Land Area (WLA) description published by NatureScot (then SNH) in 2014 mentions the Duchally hydro scheme. Outside the WLA boundary, in the *'upper reaches of the glen'*, this is recognised as having an influence on the

surrounding wild land qualities. However, this hydro development is part of the existing baseline, it is outside the WLA and not a justification for placing the twenty turbine scheme and its associated infrastructure in the WLA. This would amount to development on a scale beyond other structures that exist in the landscape at present and compromise the sense of expansiveness, naturalness and locally experienced solitude of the Reay Cassley WLA.

9. Scottish Planning Policy does not differentiate between parts of a Wild Land Area that may be more or less sensitive to types or scale of development or be considered as having more or less capacity for development due to existing influences. It recognises, instead, that Wild Land Areas in their entirety *'have little or no capacity to accept new development'* (SPP2, paragraph 200). The location of the proposed development, within the south-eastern part of the Reay-Cassley Wild Land Area, with all turbines and most infrastructure within the Wild Land Area, is not therefore sited in such a way that it can justify nor mitigate the harm (localised, direct harm as well as indirect, wider ranging harm) it would have on the Wild Land Area.
10. It is not simply the siting, in a Wild Land Area, but the scale and extent of what is being proposed and the implications for sensitive upland habitats, which mean the significant effects cannot be overcome by design or other mitigation. 17.3km of new access tracks (minimum 4.5m wide plus 0.5m each side), twenty new turbine foundations each requiring approximately 700m<sup>3</sup> of concrete (totalling 14,000m<sup>3</sup>) and 100 tonnes of steel reinforcement (totalling 2,000 tonnes) (paragraph 3.3.14, Volume 2, Chapter 3), a new on-site substation, one LiDAR compound, five borrow pits, new underground cabling and two temporary construction compounds. At this scale of development, the sensitive upland ecology and the wild land quality - *'Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains'* - would be displaced and replaced with concrete, steel, rock, cabling and electrical infrastructure, whilst the simplicity and openness of the natural landform would be replaced by turbine structures and tracks.

#### **Peat**

11. The anticipated structural and land shaping impacts are accompanied by ecological impacts. The Ecology Report (Volume 2, Chapter 8, Ecology Report) notes that the dominant habitats within the site boundary are wet dwarf shrub heath and blanket bog. The extent to which these habitats are dominant is evident from the records of habitat surveys for the study area: 683.1 ha of the study area was recorded as wet dwarf shrub heath and 520.31 ha was recorded as blanket bog habitat (Table 8.8: Habitat types, Volume 2, Chapter 8, Ecology Report). The presence of these habitats signals the sensitivity of this entire upland area as important carbon sequestering habitat. These two habitats are widely accepted as important, nationally, as a natural store of carbon and preserving them is part of a committed response to the climate and ecological emergencies. However, contrary to preserving these important habitats, the Ecology Report states the proposed development will be causing them significant harm: *'significant effects in terms of the EIA Regulations are predicted for blanket bog'* in the absence of any mitigation (paragraph 8.1.4 of the Ecology Report). The Outline Habitat Management Plan further summarises the impacts on blanket bog priority habitat as significant: *'Within the EIA Report assessment in Chapter 8: Ecology, it*

*is predicted that 7.04 hectares (Ha) of blanket bog habitat would be permanently lost, 15.71 Ha temporarily lost during construction, and an additional 18.52 Ha indirectly affected and altered during the lifespan of the Proposed Development, which combined (and prior to implementation of further mitigation and enhancement measures), is considered to have a significant effect on the conservation status of blanket mire communities.'* (paragraph 8.1.4, Volume 4, Appendix 8.10)

- 12.** The ecological sensitivity in relation to peatlands is confirmed by the site being surrounded by sites designated for habitat or natural features associated with peat. The Caithness & Sutherland Peatlands Ramsar site, important for breeding birds and blanket bog habitat, borders the eastern boundary of the site; Strath an Loin SSSI, designated for blanket bog, is 2.5km north west of the site; Grudie Peatlands SSSI, important for blanket bog and breeding waders, borders the east of the site. These surrounding designations, whilst avoided by the development, demonstrate the sensitivity of this upland area to any type of development and especially, in a time of ecological and climate emergency, raise questions about the appropriateness of development on the scale envisaged at the site proposed.
- 13.** The Scottish Government has identified the critical importance of Scotland's peatlands in current Scottish Planning Policy (SPP2). Under Table 1 of SPP2, peatlands are considered '*nationally important mapped environmental interests*'. A peatland map has classified peatlands nationally into Class 1 and Class 2 categories. The proposed development site is made up of areas of Class 1 and Class 2 peatlands. This is significant in biodiversity as well as carbon terms and the applicant is obliged to show how it will minimise the loss of carbon dioxide resulting from the development. Paragraph 205 of SPP2 states, '*Where peat and other carbon rich soils are present, applicants should assess the likely effects of development on carbon dioxide (CO<sub>2</sub>) emissions. Where peatland is drained or otherwise disturbed, there is liable to be a release of CO<sub>2</sub> to the atmosphere. Developments should aim to minimise this release.*' Figure 11.4, Volume 2, shows 6 of the 20 turbines on Class 1 peatland (turbines 20, 18, 6, 8, 4 and 3). The remaining turbines are all shown to be on Class 2 peatland. Siting turbines on Class 1 peatland is at odds with planning policy that seeks to protect peatlands from development. It is also at odds with a design approach that has sought to minimise the loss of carbon dioxide from the development.
- 14.** Twenty turbine foundations, 15.23km of cut track network and five borrow pits on this proposed site will all require the excavation of peat. The amount of peat to be excavated is expected to be 20,400m<sup>3</sup> plus an additional 64,000m<sup>3</sup> (Volume 4, Technical Appendix 11.4, Carbon Calculation). According to SPP2 at paragraph 241, '*Policies should protect areas of peatland and only permit commercial extraction in areas suffering historic, significant damage through human activity and where the conservation value is low and restoration is impossible.*' The proposed development amounts to commercial extraction considering it is being necessitated by a commercial operation that has chosen peatland slopes as its construction and operational site. At the scale and extent proposed the damage would be significant and it has not been shown that the conservation value of these upland slopes is low, nor that restoration is impossible.

15. The opposite in fact appears to be the case, as the blanket bog has deteriorated but is not beyond repair: *'The blanket bog in the Study Area was considered mostly to be of intermediate condition, with areas of 'bad quality' where the erosion was most pronounced (M3 and eroding areas of blanket bog, particularly M17b) and small areas of 'good quality' where there were multiple surface water pools, hummocks and a degree of natural surface pattern. The condition of the peatland habitats was considered to be similar between 2012 and 2020 with impacts from deer grazing evident, but generally unchanged. The areas of actively eroding peatland was also not noticeably changed between to the two field survey visits (2012 and 2020).'*' (Ecology Report, paragraph 8.6.26). The Outline Habitat Management Plan confirms that blanket bog on the proposed site is suitable for restoration *'The Site conditions in these areas are favourable for the active restoration of peatland habitats and are considered likely to regenerate naturally, following active measures to reduce peat erosion'* (paragraph 8.2.3, Volume 4, Technical Appendix 8.10, Outline Habitat Management Plan).

### **Indirect impacts on wild land**

16. In addition to direct and indirect impacts on the Reay Cassley Wild Land Area, including impacts on the quality and intactness of the area's ecology, there would be indirect impacts. The LVIA acknowledges indirect impacts on the surrounding landscape that would result from siting the development in the south-east of the Reay-Cassley Wild Land Area: *'There would also be indirect effects to surrounding areas due to intervisibility with the Proposed Development. This would largely affect an area to the north and north-west of the Proposed Development covering localised areas of plateau ridge to the east and west of Glen Cassley and the south easterly slopes and summits of the mountain area surrounding Ben More Assynt, Meall and Aonaich and Breabag.'* (Paragraph 7.7.35, LVIA). These changes would alter the ability of people visiting the area to experience the wild qualities of the surrounding area. Mountaineering Scotland, anticipated this in their Scoping response, stating, *'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.'* They confirmed their view in their application response, stating visual impacts would be experienced across a *'wide arc of hills'* in the surrounding area.

17. There would also be indirect impacts on the nearby Foinaven-Ben Hee Wild Land Area. This Wild Land Area is located to the north of the proposed development. An extensive area of wild land of open peatlands and mountains, it offers visitors expansive views towards the Reay-Cassley Wild Land Area. The proposed development would bring the presence of onshore wind closer to this Wild Land Area which *'would generally appear on the southerly skyline when viewed from open and elevated parts within 10-11km of the southern and south-western boundaries.'* (LVIA, paragraph 7.7.42). According to the LVIA, paragraph 7.7.45, *'A limited and localised effect is anticipated to the WLA Key Quality "Extensive peatland slopes that appear awe-inspiring in their simplicity and contrast to neighbouring mountains, and allow wide open views of the surrounding area," due to a potential small reduction in the perceived scale of the open peatlands in localised areas, where the slightly increased scale of the Proposed Development in relation to existing wind turbines in the southern context would be perceived.'* The other Wild Land Area quality to be effected would

be the quality of *'Towering, rugged mountains, highlighted by their prominent rock covering, that appear awe-inspiring and contribute to a strong sense of naturalness'* in an area *'across high ground around Ben Hee, due to the slightly increased focus of turbines within the extensive southerly views obtained from this area.'* (LVIA paragraph 7.7.46)

18. These indirect impacts make the development contrary SPP2 Paragraph 202 which 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. SPP2 Paragraph 203 advises that permission should be refused where the nature or scale would have an unacceptable impact on the natural environment.

### **Assynt-Coigach National Scenic Area**

19. The Landscape and Visual Impact Assessment recognises that there would be indirect impacts on the nearby Assynt-Coigach National Scenic Area *'mostly around Ben More Assynt and Braebeg on the eastern edge of the NSA, and locally and more distantly on the more southerly of the Assynt mountains and Ben More Coigach.'* (Paragraph 7.7.28, LVIA). This part of the Assynt-Coigach National Scenic Area overlaps with the Reay-Cassley Wild Land Area designation and Ben More Assynt is both a landmark of the National Scenic Area and the Wild Land Area. The Wild Land Area description notes that it is to the east and the south of Ben More Assynt that the *'arresting'* quality of the extensive elevated peatlands are obvious. The proposed development would limit the natural extent of the views over the peatlands from Ben More Assynt and other peaks on the eastern side of the National Scenic Area - as well as the peaks within the southern part of the Wild Land Area - due to turbines appearing in the mid-ground view clearly within the upland area rather than on the periphery (Volume 3A, Figures 7.18.3 and 7.18.4, Viewpoint 10, Ben More Assynt).
20. In terms of the special qualities of the Assynt-Coigach National Scenic Area, the qualities we expect to be impacted most as a result of the proposed development are *'A landscape of vast open space and exposure'* and *'Significant tracts of wild land'*. The continuity of wild land between the National Scenic Area designation and Wild Land Area would be disrupted by the proposed development. Given its scale and siting within a southern limb of the Wild Land Area, *'this is anticipated to result in visual effects which may be significant from some of the closer isolated summits in this area such as VP21, Meall an Aonaich'*. (Paragraph 7.7.30, LVIA). The visual impacts are confirmed by Volume 3A, Figure 7.29.4 Viewpoint 21, Meall an Aonaich.
21. According to Paragraph 212 of SPP2, development that affects a National Scenic Area should only be permitted where 1) *'the objectives of designation and the overall integrity of the area will not be compromised'*; or 2) *'any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental or economic benefits of national importance.'* Although the LVIA concludes that the overall integrity of the National Scenic Area would not be compromised, the impacts remain

relevant in weighing up the significant adverse effects, in combination with the Wild Land Area impacts, versus the benefits of the proposed development.

### Highland Planning Policy

22. A combination of direct and indirect impacts on landscape make the proposed development contrary to the following policies of the Highland Wide Local Development plan: -
- a. Policy 61. This policy advises that new developments should be designed to reflect the landscape characteristics and special qualities identified in the Landscape Character 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 proposed development is not an appropriate scale for this high quality landscape area and it is doubtful whether in reality it constitutes an extension and therefore whether it would be an appropriate pattern.
  - b. Policy 67. This states the Council will support renewable development where it is located, sited and designed so that it will not be significantly detrimental overall, either individually or cumulatively with other development. This development would have a detrimental overall effect on the peatland slopes and peatland ecology of the Reay-Cassley Wild Land Area. In combination with the proposed Sallachy wind farm it would have a significant detrimental overall effect on the south-eastern part of the Wild Land Area.
  - c. Policy 57. This is relevant in relation to the protection of designated areas. With respect to areas of national importance such as National Scenic Areas and Wild Land Areas, Part 2 of the policy states *'...we will allow developments that can be shown not to compromise the natural environment, amenity and heritage resource. Where there may be any significant adverse effects, these 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'*. The significant adverse effects that would arise from developing the proposed site, which has already been identified as of national importance, have not been demonstrably outweighed by this proposal.
  - d. Policy 28. This requires The Highland Council *'to support developments which promote and enhance the social, economic and environmental wellbeing of the people of Highland.'* Under this policy, developments are assessed according to measures of sustainability – those that apply in this case are 1) the extent to which the development makes use of a brownfield site - this development is on a greenfield site; 2) the extent to which it impacts a non-renewable resource - peatland is a non-renewable resource and this development will have a significant impact on peatland; 3) the extent to which it demonstrates sensitive siting and high quality design - the siting in part of a Wild Land Area within reach of nearby landscape designations is the opposite of sensitive siting; and, 4) the extent to which the development impacts on habitats, landscape and scenery - this development will impact priority peatland habitats, be located in an area of high landscape value and compromise some of the special qualities of the Coigach Assynt National Scenic Area.



**23.** Other National Planning Policies with a rural development focus that the proposed development is contrary to: -

- a. SPP2 Paragraph 75. According to this policy 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. On our submission, it is for the local communities to determine whether the emerging pattern of development is appropriate and their consultation feedback should be carefully reviewed to inform the outcome of this planning application. From the planning documentation, we are not aware of any ambition for part community ownership of the proposed development. Whilst community ownership agreements are not material considerations in determining a planning application, in their decision in November 2015 to refuse the Glencassley wind farm, Ministers noted *'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.'*
- b. SPP2 Paragraph 77. This states *'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'*. This development is part of SSE's centralised model of electricity generation whereby energy generation is controlled by the company and distributed through the national grid bypassing supply to the local area and local energy needs.

## **Mitigation**

**24.** The mitigation that has been proposed does not overcome the significant impacts.

- a. Only 2.02km of floating tracks compared to 15.23km of cut tracks are proposed and, looking at the detail, would appear to be in four small sections. (Figure Technical Appendix 10.1 shows four small sections of floating track over Class 1 peatlands with the remainder as non-floating track sections over Class 1 peatlands). Considering the sensitivity of the upland area, these short sections of track bring into question whether this form of mitigation has been used to its most effective end in the design and planning of this development.
- b. The core aim of the Outline Habitat Management Plan is *'to restore and enhance degraded or modified blanket bog and wet heath habitats both within the Site and in other areas of Glencassley Estate.'* (Paragraph 3.1.7, Volume 2, Chapter 3). These core aims are welcomed. However, the Outline Habitat Management Plan seems to only reference habitat restoration with respect to *'three candidate management units'*, which are all off site. At these sites *'measures would be undertaken to encourage the regeneration of blanket bog habitat using best practice techniques'* (paragraph 8.4.5, Volume 4, Appendix 8.10). It seems that there is no mitigation or compensatory action planned for areas of habitat lost on site. Given the proposed site borders the Caithness and Sutherland Peatlands Special Area of Conservation, this seems like an oversight and a missed opportunity to mitigate the direct harm to the peatlands on the site. It also seems like an oversight given the extent of peatland

habitat that would be directly affected by the proposed development: 98.88 ha (Table 8.7.4, Volume 4, Technical Appendix 8.7, Habitat Loss Calculations) and the area of Phase 1 habitats and National Vegetation Communities that would be directly affected: 110.88 ha (Table 8.7.2, Volume 4, Technical Appendix 8.7, Habitat Loss Calculations).

- c. The number of turbines proposed would double the existing Achany development from 19 to 39. Whilst it is understood that the original plans for 26 turbines at Glencassley were revised down to 20, the number is still a scale that is at odds with design approaches that could be reasonably expected to mitigate harm in an area of national importance and in the wider context of a landscape that is of high value.
- d. At 1.8km distance (Table 7.8.4, 'Cumulative Baseline Sites Included in the Cumulative LVIA') from the existing Achany wind farm, it is arguable whether the proposed development qualifies as an extension. Figure 7.7.2 (Volume 3B) plots the cumulative sites and clearly shows the separation between the proposed development and the existing Achany wind farm. It also shows the Rosehall development, which at 2.1km from the proposed development, is not much further away than the Achany wind farm but would not be considered an extension of Achany. It's acknowledged that the proposed wind turbines have moved closer to the Achany wind farm compared to the former Glencassley proposals. However this hardly counts as mitigation when they are still located well within the southern area of the Reay-Cassley Wild Land Area, and it is not clear from the information presented what the design mitigation has been to overcome the effects of their being sited there.

### **Cumulative impacts**

25. The combined impact of the proposed development with the proposed Sallachy wind farm would alter the south-eastern part of the Wild Land Area (WLA) to the point we could expect it would no longer fulfill the criteria to be mapped as wild land. In May this year the Trust submitted an objection to the proposed Sallachy wind farm. Our grounds for objecting to that wind farm were similar to those presented here. Whilst that development was smaller in scale and therefore its footprint and extent of visibility less than the proposed Achany extension, the turbines would still be a dominant feature in the landscape within the Reay-Cassley WLA. The LVIA acknowledges the cumulative effects of development as likely to have a significant effect on the '*elevated peatlands*' quality of the Reay-Cassley WLA. '*For both cumulative baseline scenarios, a corresponding significant effect within localised parts of the high plateaux to east and west of Glen Cassley, would be anticipated for the WLA Key Quality, "Extensive, elevated peatland slopes whose simplicity and openness contribute to a perception of awe, whilst highlighting the qualities of adjacent mountains," due to a perception of reduced scale to the open peatland landscape setting in the south-eastern context.*' (Paragraph 7.8.43, LVIA). If both developments were to be sited on the peatland slopes of the Wild Land Area, the cumulative effects on the wild quality and the peatland ecology would be devastating.
26. Despite the cumulative impacts, the LVIA concludes that the integrity of the Wild Land Area would be retained. We disagree that the overall integrity can be retained when there would be two clusters of turbines both in the same south-eastern part of the Wild Land Area which

would bring an established presence of turbines to Glen Cassley and turbines into view from the slopes and summits of Ben More Assynt as well as the surrounding peaks. This would make turbines a new, dominant feature of the area where otherwise the dominant features arise from the land's natural form. On our submission the proposed development would be at a considerable variance to the landform due to its scale and extent which would make it a dominant feature and as such it would have a significant overall effect.

- 27.** In addition to the proposed Sallachy wind farm, the presence of other wind farms already constructed or under construction within 20km of the proposed development signal the compounded visual attrition and loss of the Reay-Cassley Wild Land Area's wild qualities from beyond the WLA. These are summarised in 'Table 7.8.4: Cumulative Baseline Sites Included in the CLVIA' as: Achany wind farm, 19 turbines, 1.8km to the south-east; Lairg wind farm, 3 turbines, 13.6km to the south-east; Lairg extension, 10 turbines, 13.3km to the south-east; Rosehall wind farm, 19 turbines, 2.1km to the south-east; Braemore wind farm, 18 turbines, 7.5km to the south-east; Creag Riabhach wind farm, 22 turbines, 17.4km to the north-east. The pattern of wind farm development emerging to the south-east of the Reay-Cassley Wild Land Area is not a justification for extending onshore wind into the Wild Land Area. The relationship between existing, consented and under construction wind farms requires careful consideration at any time and especially near Wild Land Areas. For these areas, NatureScot guidance cautions '*it can be difficult to mitigate the impacts on wild land even if general good design principles are adhered to, as it is often the presence of the turbines as a highly visible element that will result in a significant effect.*' (Guidance – Assessing the cumulative impact of onshore wind energy development, NatureScot).

## **Conclusion**

- 28.** In conclusion, this development would be contrary to well established planning policy, including the way Scottish Ministers have sought to protect Scotland's Wild Land Areas from large scale onshore wind development that would significantly impact their wild land qualities. Refusing this application would be consistent with Scottish Ministerial planning decisions made over the past seven years and, specifically, it would be consistent with the previous decision to refuse the former Glencassley application proposed on this site. The SPP2 onshore spatial framework in Table 1 was developed to aid consistency in planning decisions and the expectation is this would be applied consistently: '*The approach to spatial framework preparation set out in the SPP should be followed in order to deliver consistency nationally*' (Paragraph 163, SPP2). The John Muir Trust strongly recognises that there is a climate emergency. We also recognise that pathways to net zero are not dictated by renewable energy companies but by Government policies. We urge Scottish Ministers to consider this application very carefully and to weigh up the long term loss of an upland peatland store, a non-renewable natural resource, and part of an area of national importance which has been clearly identified in Scottish Planning Policy as having little to no capacity for development.

Yours faithfully,

The John Muir Trust