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24 May 2022

Dear Sir/Madam,

Re: Achany Extension Additional Information

Thank you for consulting the John Muir Trust following Additional Information being submitted for the Achany extension wind farm application ECU reference 'ECU00001930'.

The Trust understands that two turbines, turbines 10 and 20, have been removed from the design and as a result the overall track length has been reduced and the land that would be used for hard standings has also reduced. We also understand that the Highland Council stated it would not object to the proposal if these two turbines were removed from the design.

We have considered the Additional Information and maintain our objection to the proposal. We have the following comments to make:

1. The removal of two turbines does not translate into a material change to the significant visual impacts that this development is predicted to have on viewpoints within the Reay Cassley Wild Land Area. 'Table 3.2: Comparison of Visual Effects for Representative Viewpoints' in 'Additional Information - Volume 1: Main Report' records no change in the impact of the development on any of the 21 viewpoints despite two turbines being removed from the design.
2. The Highland Council in their consultation response stated that removing turbines 10 and 20 would 'reduce the impact from key areas within the Wild Land Area, including Ben More Assynt' but this does not appear to be supported by the image showing the view of the revised scheme from Ben More Assynt (see 'Additional Information - Volume 2 - Figure 3.11.1 - 3.11.2 - VP 10 Ben More Assynt') nor by the summary table in the Additional Information Main Report, which states for the Ben More Assynt viewpoint, 'The removal of T10 and T20 would reduce the number of turbines visible, but would not alter the horizontal spread. These turbines would sit a little higher than some other turbines and this may be perceived in the view depending on the weather conditions. The removal of these turbines would slightly reduce turbine density but would be unlikely to lead to a noticeable change in the perceptibility and presence of the wind farm within the view when compared to the EIA Report (July 2021) Layout. It is therefore considered that the level of effect would not be altered.'
3. The removal of two turbines from the scheme does not address the Trust's concerns about the impact this development will have on the Wild Land Area, particularly the change in land use in the southern part of the Wild Land Area in which it is proposed. For a scheme where all the proposed turbines are sited in the Wild Land Area, removing

two turbines does not change the overall scale of what is being proposed in a sensitive location of national importance. Under the revised plans, 32,421.5m<sup>3</sup> of the Wild Land Area will still become a large-scale wind farm. Whilst this is 3,602.39m<sup>2</sup> less than the 36,023.89m<sup>2</sup> area that would be developed under the 20 turbine original plans, it remains a large area that would be subject to irreversible land use change. We acknowledge that the height of the turbines has been limited to 149.9m, just below the 150m height requirement for aviation lighting, however in our view this does not overcome the visual, landscape and ecological impacts that would still result from construction and siting.

4. There appear to be no visual or landscape benefits from removing the two turbines. The 'Additional Information – Volume 1 - Main Report' concludes that following the removal of two turbines there would be 'no changes to the number and distribution of significant landscape and visual, and cumulative landscape and visual effects for the Proposed Development.' The absence of visual or landscape benefits is confirmed by Table 3.2, submitted as part of the Additional Information, and the statement at paragraph 3.3.1 that 'There would be no changes to the effects reported in the EIA Report (July 2021) on the Assynt – Coigach National Scenic Area (NSA) or Wild Land Area (WLA) 34 – Reay – Cassley because the turbines removed are further from these sensitive landscapes than other remaining turbines.' We are therefore not convinced that removing these two turbines is adequately supported by a visual or landscape amenity justification.
5. We recognise the benefits of removing two turbines from the scheme in terms of reducing habitat loss and that the 'Additional Information – Volume 1 - Main Report' states removing these turbines might enable habitat reinstatement in areas near the Caithness and Sutherland Peatlands Special Area of Conservation. However, the reduced habitat loss is not in our view sufficient grounds to justify the revised scheme and a revised outline Habitat Management Plan has not been submitted to confirm whether removing the two turbines will enable earlier habitat reinstatement, suggesting this may be a statement of possibility rather than one of commitment. Furthermore, if habitat loss and the protection of the designated peatland habitats on the site boundary (designated as Caithness and Sutherland Peatlands Special Protection Area, Special Area of Conservation and RAMSAR site and Grudie Peatlands Site of Special Scientific Information) was being taken seriously as part of design mitigation then we would expect turbines and associated tracks and hard standings closest to these designations to be removed (turbines 3, 4, 6, 11 and 12 as well as turbines 17 and 18) rather than turbines 10 and 20.
6. The overall site boundary which is subject to planning permission remains unchanged. There is an emerging pattern in planning applications for renewable energy development for over 50MW whereby once planning permission is granted for a site, further applications to extend existing development can be expected. We recommend that the Scottish Government considers whether this is a wild area of Scotland which it would like to see become developed or whether, instead, this is a wild area of Scotland to safeguard and protect.

In summary, we cannot accept that the removal of the two turbines amounts to substantially overcoming the impacts on the Reay Cassley Wild Land Area. At 18 turbines the proposal remains a large industrial scale development in an area of significant protection under Scottish Planning Policy. We therefore maintain our objection.

Yours sincerely,  
John Muir Trust