

From: [Duncan, Robert](#)
To: [Nicola Ferguson](#)
Cc: [Hiscox, John](#)
Subject: ECU00004878 Blair Hill Wind Farm
Date: 06 February 2024 14:03:14
Attachments: [231768ena council landscape architect 02.02.2024.pdf](#)
[231768ena council archaeologist 27.01.2024.pdf](#)

OFFICIAL

Afternoon Nicola,

Further to the Council's previous consultation response of 7 November 2023 in connection with the above, please find attached responses from the Council's Archaeologist and Landscape Architect which, whilst belated, will hopefully prove to be useful to you.

Regards,

Robert

Robert Duncan

Team Leader (Major Developments)

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Internal Memo

Economy and Resources – Development Planning

27 January 2024

To: Robert Duncan, Militia House, Dumfries

Your ref: 23/1786/ENQ

From: Andrew Nicholson, Archaeologist, Militia House, Dumfries

Our ref: EPCO/2024/Arch/DM

Request for Scoping Opinion

REQUEST FOR SCOPING OPINION UNDER ENVIRONMENTAL IMPACT ASSESSMENT (SCOTLAND) REGULATIONS 2017 FOR PROPOSED WIND FARM COMPRISING OF 22 WIND TURBINES (UP TO 250 METRES BASE TO TIP HEIGHT), WITH ASSOCIATED INFRASTRUCTURE INCLUDING ENERGY STORAGE SYSTEM AT BLAIR HILL WIND FARM, NEWTON STEWART. SCOTTISH GOVERNMENT CASE REF. ECU00004878: COMMENTS FROM COUNCIL ARCHAEOLOGY SERVICE

The application is for twenty-two turbines on open moorland and woodland to the north-east of Newton Stewart. The proposal is for turbines up to 250 m to turbine blade tip, with associated infrastructure.

It is confirmed that there is potential for a proposal of this nature to have a significant impact on cultural heritage assets and therefore potential effects will need to be assessed in an environmental impact assessment. Both direct and indirect effects will need to be assessed. Careful note should be taken of the following in respect of this assessment:

Planning Policy IN1: Wind Energy Development

The applicant should be aware of the statutory supplementary guidance Part 1 Wind Energy Development: Development Management Considerations, adopted February 2020 and the accompanying Dumfries and Galloway Wind Farm Landscape Capacity Study in appendix C.

It is advised that the landscape capacity study considered 'Settlement and Archaeology' as one of the landscape sensitivities informing the landscape capacity study and the resulting spatial framework.

In addition, Section H of the SPG contains guidance on Historic Environment and Cultural Heritage for all proposals that must be considered.

It is noted that the proposed turbines are 250m and therefore the assessment will have to consider effects of turbines of this scale. At such a height they are liable to have a widespread visibility within 10km of the site. A potentially wide effect on historic character can be anticipated. This should be assessed.

Impact Assessment

Generally, impacts on the setting of significant historic environment assets, should be led by the Zone of Theoretical Visibility (ZTV), with the greatest effects likely to be experienced by sites of national (note that not all are designated), or greater significance closest to the site.

A historic environment impact assessment should consider all direct impacts of the proposal including within the development site itself and any access routes. Indirect effects should also be considered. Nationally significant sites (Scheduled Monuments, Inventory Designed Landscapes, A-listed buildings and unscheduled sites considered by the local authority to be of national significance) out to 10km should be assessed, as well as regionally significant Non-Inventory Designed Landscapes, Archaeologically Sensitive Areas and Conservation Areas for which there are specific Council historic environment policies. Regionally significant historic assets out to 5km should also be assessed in cases such as burial cairns, hill top forts and settlements, or commemorative monuments, where their landscape setting is one of their key characteristics.

Non-Inventory Designed Landscapes should also be included as regional designations with respect to the LVIA assessment, in addition to Inventory Designed landscapes.

I have read the Scoping Report section on Cultural Heritage and Archaeology, and the appendices 6.1 and 6.2.

Examination of the Council's Historic Environment Record notes a significant number of historic assets within the footprint of the proposed development. Whilst the scoping report recommends a targeted site inspection I consider that, given the extensive and significant assets already known, and the lack of any recent survey, a comprehensive walkover survey should be undertaken at an early stage, along with other specialist surveys, in order to inform the layout and to achieve mitigation by avoidance wherever possible.

Survey and assessment for the proposal should also include the access route. Although it would appear to utilise many existing forestry roads these cut through a number of known assets and any scheme for improvement, such as widening, passing lanes or drainage, would also have the potential for direct impacts.

As with other sections of the report the second section of 6.3.4 concentrates on "designated heritage assets" even though it accepts, as shown in Table 6.1, that heritage assets that are considered by the Council's archaeology service to meet the criteria for designation have high cultural significance. The latter have all been identified through information supplied from the Council's Historic Environment Record (HER) and listed as such in Appendix 6.2. These should be subject to the same survey and assessment procedure as designated assets.

Information on the extent of and results from the walkover must be logged by the chosen archaeological contractor as an archaeological event via the online OASIS recording system. It would be helpful if the Council's Historic Environment Record could be provided with the final gazetteer of sites in digital format, along with corresponding GIS datasets for the location and extent of any identified assets, as well as the extent of the walkover. Examination of the

appendices indicates that the walkover was not confined to known sites, but it is important to know spatially which areas have been surveyed and which not.

Scottish Government remote sensing data should also be consulted in assessing historic environment assets within the footprint <https://remotesensingdata.gov.scot/>



Within the baseline description there is an image looking over the Cree valley from The Thieves standing stones. Whilst such views are **part** of the setting of the monument the modern approach to the stones is usually from the south or south-east, and, having taken guided walks around the area for the local walking festival, the reverse view is the one that is always selected for the taking of photographs. Setting for the monument includes how it is perceived in the present, and this significant view should not be ignored in any assessment.

The area is often used by local walkers and the approach is usually by the track that passes up through Drannadow farm. Views of the monuments looking towards the windfarm are therefore significant in relation to the modern

appreciation of the monuments and their setting and sense of place.

With regards to the views from Drumfire cairn and stone circle (SM1019) views towards the Drumfern cairn to the north (MDG2675), undesignated but assessed as being potentially of national significance, should be taken into account as well as those to the equally contemporary designated assets. Again there appears to be a stress on views away from the proposed development rather than those that lead into it.

With Napper's Cottage chambered cairn the same applies as that to The Thieves – the modern approach to the site is from the south and the initial appreciation of the site's setting is

looking northwards, into the development. Views from the Drumfern cairn noted above towards the assets should also be included in its assessment.

Terregan (MDG14810) and Threave (MDG15221) are farmsteads of regional significance. Their setting includes their location in marginal land, abandoned as climate change affected the sustainability of agriculture as well as population moves towards urban centres. The fact that the higher set farms are abandoned, but the lower ones continue in use is a significant element in understanding their function and their reason for subsequent abandonment.

The same applies to the farmstead of Knockbracks with its surrounding field system and enclosures, and a smaller farmstead to the south-west, on the southern slope of Glenmalloch Hill. These assets are assessed as potentially of national significance due to their good preservation, and due to Knockbracks, like Terregan, being depicted on the earliest mapping of the region suggesting potential medieval or earlier origins. Again their setting, on marginal hill land, is a significant element in understanding their function and their reason for subsequent abandonment.

I am mostly content with the list of cultural heritage assets that are proposed to be left out of the assessment. However I would wish to see the A-Listed Cumloden House included for assessment. The principal approach to the house is along the drive from the south and the first views of the house come from this approach. As set within its designed landscape, this is clearly the view of the house which was meant to be seen and appreciated first. As such it is highly significant to the setting of the building. The proposed scheme will form a backdrop to the house in this view and its impact on the setting of the house should be assessed accordingly.

A number of cultural heritage viewpoints are proposed, and wireframes for some provided. On the whole I am in agreement with the proposed viewpoints. As noted above I would wish to see an additional viewpoint from the drive looking towards Cumloden House, around NX 4180 6757. This should be a photomontage view.

Garlies Castle is set in mature deciduous woodland and has limited direct views up the hill. I do note and agree with the assessment of views along the track approaching the castle from the south-west. I would also wish for a viewpoint further along the track, after it passes through the boundary wall, at the site of the farmstead/fermtoun at NX 4191 6923 at the point where the medieval and post-medieval occupation



becomes visible within the landscape.

Policy

Key policy statements that have been issued by Scottish Government in relation to the historic environment are:

- Historic Environment Policy for Scotland (HEPS) 2019
- National Planning Policy 4 (2023)
- Managing Change in the Historic Environment: Setting 2016 (updated 2020)
- Environmental Impact Assessment Handbook SNH/HES 2018
- Planning Advice Note 2/2011 Planning and Archaeology

In addition to national policy the relevant Council policies covering the historic environment in this case are:

- Local Development Plan Policy HE1: Listed Buildings
- Local Development Plan Policy HE2: Conservation Areas
- Local Development Plan Policy HE3: Archaeology
- Local Development Plan Policy HE4: Archaeologically Sensitive Areas
- Local Development Plan Policy HE6: Gardens and Designed Landscapes

The Council's Supplementary Guidance on the Built Historic Environment should also be used to inform the cultural heritage impact assessment.

Cumulative effects will also need to be considered. The Planning case officer will confirm the developments that need to be considered.

Memo

Date: 2 February 2024

To: Robert Duncan
Copy: John Hiscox, Andy Nicholson

Your ref: 23/1768/ENQ

Drop Point:

From: Janet Swailes, Landscape Architect (Wind Farms),
Major Projects, Development Management

**BLAIR HILL WIND FARM – SCOPING
ERECTION OF TOTAL 22 NO. WIND TURBINES, WITH MAX TIP HEIGHT 250M.
4 KM WEST OF NEW LUCE, AND ASSOCIATED INFRASTRUCTURE**

CONSULTATION RESPONSE, DGC LANDSCAPE ARCHITECT

Contents

Introduction

Initial comments

Scoping report consultation questions

- 1 Policy and guidance
- 2 Landscape
- 3 Visual
- 4 Cumulative
- 5 Design

Wind Farm

Introduction

Landscape advice; There is currently significant pressure on landscape resources and the focus of time will be on planning application casework. Any landscape pre-app and scoping input that can be made will primarily be based on a desk exercise, and any existing familiarity with the area.

The landscape advice provided is without prejudice to future advice and opinion, or any decision which the Council as planning authority may choose to make in respect of any future planning application. Furthermore, it should not be assumed that every issue which might impact on any such application has been addressed in this report; other issues may come to light because of consultation with other relevant bodies, or in relation to any future planning application. One landscape opinion only will be provided to schemes at scoping, and all further enquiries are to be referred directly to the planning case officer.

Site visits; I have not been able to make a site visit for Blair Hill Wind Farm scoping opinion. However I do intend to make a site visit during February 2024, given the wide ranging landscape concerns this application raises. I am reasonably familiar with many of the proposed lower level representative viewpoints and the general area in connection with other casework, but need to refresh my knowledge and verify exact positions for additionally requested representative viewpoints.

There may be further representative viewpoints, assessment and visualizations required, as the scheme progresses.

Initial comments

Siting and design; Blair Hill is an extensive (5 km by up to 2 km) Very Large typology scheme in a highly sensitive and prominent location. The site has a particularly notable local and wider prominence as it occupies an intrinsic focal point in the landscape, sited north of Newton Stewart at the confluence of the Cree and tributary Penkiln valleys, and over the lower and mid slopes of the group of hills comprising Lamachan and Curleywee.

- Newton Stewart; The scheme is at closest 2.3 km north of Newton Stewart and. It is anticipated that even though the layout would be 'end on' to the town, the closest of the 250m turbines over Glenmalloch Hill would be dominant and given the proximity and small scale context of the Penkiln Burn valley, potentially overbearing for the north of the town and Minnigaff. Within short range (<5km) ten or so turbines would be sited at up to 260m AOD, such that tip heights would be perceptibly at almost 500m above the town.
- The Cree valley and local landscapes around Newton Stewart; The Blair Hill layout extends up the Cree valley, set back by 400m to 2.5 km. The scheme would dominate the setting of the valley, which is particularly attractive in its lower reaches as appreciated from the A714 key tourist route and NCR7. The turbines would be seen in the contexts of Knockman Wood and Garlies Wood, which along with the Cree Wood are valued beauty spots especially as iconic 'Bluebell Woods', and recreational resources for the town; as well as designated wildlife and historic assets. The woodlands and surrounding historic moorlands, characterised with relict settlements and field systems and medieval features are appreciated from the network of minor roads and footpaths up the Cree and Penkiln Burn valleys, including NCR 7; and celebrated in Newton Stewart's long established and popular annual walking festival. This is a landscape of exceptional heritage interest and considerable scenic charm and value in terms of local beauty spots.

- Views from the Queensway / A712; Views from the final 5 km of the Queensway / A712, an iconic tourist route, approaching Newton Stewart would also be disrupted. These views from the road are particularly sensitive in terms of the finale of the drive, where the road exits forest cover and attention focuses on the quite different valley and coastal scenery.
- The Galloway Hills, Forest Park and RSA; Whilst rugged in character and of distinctive silhouettes the Lamachan / Curleywee group of hills rise to approximately 700m and would be diminished in scale and landmark presence by the scheme extending within 1 km of summit slopes, and with the highest 250m turbines sited at approximately 400m AOD. The scheme would sit across the southwestern face of the hills and therefore be visible across the full range of sensitive lowland receptors, where presently the hills are a landmark in themselves, and part of the signature silhouettes of the Galloway Hills skyline backdrop. It is anticipated the rotors, and also aviation hub lights would break this skyline in many views; as well as occupying the background to the hills seen from the interior hill summits of the Galloway Hills massif to the north and west, including the Merrick WLA. The rugged mountain views are appreciated from numerous hill routes, including the descent from the Merrick and routes along the Rhinns of Kells.
- Landscape character; The site occupies in large part an upland fringe landscape character type, categorised in the DGWLCS (2017) as Glentroll unit (LCT 16), and by NatureScot (2019) as LCT 172 Upland Fringe: *'These uplands tend to form the most visible faces of the uplands they surround These landscapes are visually prominent from lowland populated areas ...forming important skyline backdrops.'* The DGWLCS states that the upland fringes are high sensitivity with no scope for any development >50m; and that they are also sensitive to indirect effects arising from turbines in neighbouring landscapes. As transitional landscapes the upland fringes have a role in the setting of both the uplands and lowlands; would give rise to considerable and significant setting issues for the wider Galloway Hills, local landscapes around Newton Stewart, also in the wide context of the Machar and Wigtownshire Bay coastal landscapes.
- Mid and long-range views across the Machars and Wigtownshire Moors; The wide extent and height of the turbines would make the proposals a new and unwelcome focal point in longer range views from the south and west, where the distinctive backdrop / silhouette of the Galloway Hills currently contributes to the scenery. There are some notable reveals and points of outlook from the numerous roads that criss-cross the undulating Machars, where the panorama of the Galloway Hills comes in to view as an intact and unspoilt mountain range extending from the granite coastal uplands of the Cairnsmore of Fleet, northwards to the rugged granite uplands of the Galloway Hills. Similarly, the hills come into view travelling east on the A75 from Glenluce. Blair Hill would disrupt the integrity and scenery of these views.
- Designed landscapes; There are a number of Non Inventory Designed Landscapes (NIDL) at short to medium and longer range within the strong viewsheds of theoretical visibility to the west, southwest and south from Blair Hill. Of greatest concern is Castle Stewart at short range across the Cree Valley, and Kirroughtree at short range to the south. Garlieston House Inventory Designed Landscape (IDL) lies at long range but with potential for visual impacts from coastal areas if views towards the Galloway Hills are a feature.
- Dark skies, and the Galloway Forest Dark Sky Park; The 250m Blair Hill turbines would require aviation lighting; and even given the potential scope for mitigating such effects now or as technology advances is anticipated to be inadequate. The sensitivity of the site in terms of proximity to residential and recreational nighttime receptors, the long range of potential prominent visibility, and the recognised value of the dark skies for the Galloway Hills in terms of the Galloway forest Dark Sky Park, and the Merrick WLA, all are at odds with any visibly lit wind farm development.

The nature of the proposed site and wider topography will mean that the Blair Hill development would be widely visible over long distances; and detract from the impressive scenery and dark skies that the Galloway Hills contribute to across the Machars peninsula and Wigtownshire Moors; as well as impinging on the views from the Galloway Hills themselves. As such the impacts of the proposals would be extend beyond the locality of the site itself, the environs of Newton Stewart, giving rise to significant regional effects across a large tract of sensitive settled lowland and coastal landscapes, and impacting on regional and national designations.

Wind farm pattern; In terms of other schemes Blair Hill would not relate to the wider pattern of development. The scheme would set a precedence for development giving rise to this range of impacts in both Dumfries and Galloways primary mountain resource, the Galloway Hills, and one of its highly valued coastal landscapes, Wigtownshire Bay. The only comparably inappropriate proposal was California Wind farm, dismissed at appeal.

Scope for development; Accepting this is initial advice in advance of the full ES and LVIA assessment, or DGC site visits, Blair Hill Wind Farm is a proposal that should be discouraged at the outset. It is unlikely that there is scope for effective mitigation by design, or adequate compensatory mitigations for the types of adverse landscape and visual effects anticipated.

Scoping report consultation questions

Consultee answers / comments sought on:

Additional guidance; Please see Section 1 of this report that sets out the relevant guidance documents that it is recommended the ES / LVIA refers to.

The DGWLCS should be the main reference for landscape related guidance in the Blair Hill LVIA. The Scoping Report states that the NatureScot LCA will be used with respect to landscape character baseline. This should be aligned to the more detailed assessment and guidance provided by the DGWLCS, with the landscape categorisation areas, the more local and place specific Landscape Character Units.

Proposed approach; No specific comments not otherwise covered in this report.

Study area; Please see Sections 1 (1.4), 2 and 3 of this report; given the prominence of Blair Hill, with wide ranging views, particularly across extensive lower lying area to the south and west, recommended that detailed study areas be at least: landscape character 15 km, visual day and night time at least 20 km.

Viewpoint list; Please see Section 3 of this report that sets out comments in relation to the proposed list of representational viewpoints, and the visual assessment for Blair Hill.

In summary:

- The list of representational viewpoints is not adequate in its scope, and some of the representative viewpoints are not thought relevant. Further representation is needed across a range of sensitive visual receptors.
- Cumulative sequential visual assessments are required for Blair Hill from key routes, taking in the impacts of the Blair Hill scheme in itself from along the routes, and in combination with other schemes. Routes recommended for sequential visual assessment are: A75, A712, A714, NCR 7, and the Merrick hill route. See also section 4 of this report, which sets out a detailed response.

- Full photomontage visualisations to NatureScot / LI guidance standards are required for all viewpoints within 15 km and any others specifically listed; the suggested 5 km is too tight a threshold to reduce the specification of visualisations.
- No representative nighttime visualisations have been proposed, or any details regarding proposed mitigation of the effects of aviation lighting. Nighttime impacts are anticipated to be a key issue for the Blair Hill proposals due to the prominence of the scheme over wide ranging views and in the context of sensitive night time receptors, which include the Galloway Forest Dark Sky Park and the Merrick WLA. As such both more details of the lighting scheme proposed, including mitigation measures, and the scope of the information available for assessment should be fully set out at scoping stage. In this case (degree of effects, sensitivity of receptors in wide range of contexts) a greater number of full nighttime visualisations may be required than NatureScot recommendations, to represent typical night-time effects adequately.

Additional schemes to consider for cumulative impact assessment; Please see Section 4 of this report that sets out comments in relation to the cumulative context and assessment for Blair Hill.

Matters scoped out; No specific comments not otherwise covered in this report.

Status of Fell and Cornharrow wind farms applications; The scoping report proposes that Fell and Cornharrow variations are considered approved in the cumulative assessment. Fell is now approved; Cornharrow is thought to be awaiting appeal determination and as such should be treated as in-planning if this is the case. Neither of these schemes are likely to be of greatest relevance in consideration of potential cumulative interactions for Blair Hill, due to distance, and context.

1 Policy and guidance

1.1 NPF 4

1.1.1 The most relevant policies in NPF4 covering landscape and visual issues potentially arising at Blair Hill are:

- 4 Natural Places, which relates to OP1, NE2, NE3, IN2, and potentially ED11.
- 11 Energy, which relates most strongly to IN2, OP1, and IN1.
- 14 Place and Placemaking, which relates most strongly to OP2, but is also relevant for OP1 and IN2.
- 29 Rural Development, which relates to OP1, OP2, IN2, and potentially ED11.

NPF 4 has changed the balance and weight accorded to local landscape and visual impacts. It is anticipated that the degree and range of impacts likely to arise from Blair Hill, considered in the policy context of LDP2, would merit a landscape objection, with a range of local, regional and national interest assets potentially impacted on to a significant degree; and by virtue of the extent of the scheme and scale of the turbines would have significant effects across a wide geographic area and number of local contexts.

Under the changed policy context of NPF4 local landscape issues where impacts are localised, and appropriate design mitigation has been applied, proposals will generally be considered to be acceptable (Policy 11 e ii). NPF also places obligations for Development to meet a range of other policies. Of relevance to Blair Hill, the proposals should be scrutinized under the following policies to ensure the benefits it brings can be maximised: biodiversity (3); natural places (4); forestry, woodlands and trees (6); historic assets and places (7); design quality and place (14); blue and green infrastructure (20); play, recreation and sport (21); rural development (29); and tourism (30). To this end it is recommended a package of mitigation measures are brought forwards by the Blair Hill Developers to optimise the potential for compensatory mitigation.

It is recommended that a compensatory mitigation plan be requested, so that it can be put forwards as a material consideration, to balance out significant environmental impacts, including landscape and visual, assuming they would be likely to arise from these proposals.

1.2 Development Plan LDP2

1.2.1 Policies and associated guidance; The development plan for the area currently comprises the Dumfries & Galloway LDP2, adopted October 2019, would be a key material consideration in the consideration of this application. The key relevant policies for this scheme are likely to be policies OP1, OP2, IN1, IN2, NE2, NE3, HE6, and ED11,

1.2.2 Policy IN2, and associated supplementary guidance; Policy IN2: Wind Energy is the main policy for wind energy development (WED) and has reference to landscape and visual impacts, cumulative impact, impact on local communities and residential interests, tourism, and recreational interests; and a number of other non-landscape matters. The Spatial Framework Map 8 provides strategic guidance, and must be read in conjunction with the DGWLCS. *Acceptability* in relation to IN2 is judged with respect to compliance with the DGWLCS guidance for the host landscape units / LCTs, and also with respect to indirect effects on the surrounding units.

Supplementary Guidance, Wind Energy Development: Development Management Considerations (February 2020) supports IN2. This has special relevance for landscape in relation to sections C Landscape and Visual Impacts and Design of Proposals, D Cumulative Impact, E Impact on Local Communities and Residential Interest, and H including Tourism and Recreational interests; and Appendices A, B, and C:

- Appendix A: Landscape Character Sensitivity Summary Tables.
- Appendix B: There are Landscape and Visual Sensitivity maps for each development typology, with Map 5 for 'Very Large' of relevance for this scoping scheme.
- Appendix C: The landscape capacity study for wind energy development, the DGWLCS (2017) forms Appendix C of the 2019 WED Supplementary Guidance. Full reference to the key findings and detailed assessments of host and indirectly affected landscape units / LCTs should be made to the DGWLCS in the LVIA.

1.2.3 Other key relevant policies; The proposals will also be assessed in landscape terms with reference to the following policies:

- Policy OP1: Development Considerations is an overarching policy with special relevance for landscape issues, including landscape character, scenic qualities, wild land character, and local distinctiveness.
- Policy OP 2: Design Quality and Placemaking is overarching policy with special relevance for design quality and the built and natural environment; and where respecting important physical, historic and landscape features of the site and vicinity is important.
- Policy IN1: Renewable Energy applies to all renewable energy and has a reference to landscape, and the amenity of the surrounding area, including landscape and visual impacts, cumulative impacts, and impacts on tourism and recreational interests.
- Policy NE2: Regional Scenic Areas relates to the siting and design of development to respect the special qualities of RSAs, such that factors of designation would not be significantly affected. The Technical Paper, Regional Scenic Areas (January 2018) remains the key reference with respect to RSAs, although the DGWLCS provides updated information on landscape character in relation to WED and should be referenced alongside the RSA Technical Paper. Parts 1, 2, and 3 of the Technical Paper are of relevance and should be considered in the LVIA. With respect to RSAs Blair Hill may need to be assessed regarding night-time effects, as well as daytime ones.
- Policy NE3: Areas of Wild Land relates to the two Wild Land Areas sited in / partially in D&G. With respect to Blair Hill there would be potential for significant day and night time effects on the Merrick WLA, given the proximity, theoretical visibility, and prominence of the turbines. Such effects must be assessed, and avoided through siting, design or other mitigation. The Scoping Report is missing information regarding the intended approach to assessment / mitigation for WLAs.
- Policy HE6: Designed Landscapes relates to supporting development protecting and enhancing significant elements, specific qualities, character, integrity and setting, including key views to and from, gardens and designed landscapes included in the Inventory of Gardens and Designed Landscapes or the Non Inventory List. With respect to Blair Hill it is anticipated there may be potential for some significant effects on designed qualities and / or the setting, including views to and from, for Non Inventory Designed Landscapes: Castle Stewart, Kirroughtree, Cairnsmore, and Merton Hall, possibly others.
- Policy ED11: Dark Skies relates to appropriate levels of lighting and good lighting principles and practice to accord with the Supplementary Guidance in D&G, particularly with reference to the objectives of the Galloway Forest Dark Sky Park. This is likely to be relevant to turbines >150m, requiring aviation lighting. The Supplementary Guidance, Dark Sky Friendly Lighting (February 2020) should be referenced. With respect to Blair Hill, impacts on the Galloway Hills Dark Sky Park would be a key issue given the proximity and prominence of the scheme. The Scoping Report is missing information regarding the intended approach to assessment / mitigation for night time impacts on dark skies arising due to aviation lighting.

1.2.4 DGC policy and guidance comments; Please note D&G Supplementary Guidance for Wind Energy Development (2020) and specifically Appendix C, the DGWLCS should be the main reference for landscape character. The DGWLCS provides a finer grain of detailed sensitivity assessment and guidance compared to the NatureScot LCA (2019); there is also relevant guidance in the main text regarding landscape, visual and cumulative issues, all of which are anticipated would be problematic issues requiring further mitigation by design in the case of the Blair Hill proposals. The D&G Technical Paper for Regional scenic Areas (2018) should be the main reference for the RSA citations / special qualities; although the DGWLCS is also helpful with respect to landscape value and the RSAs.

1.2.5 Wind farm typology and policy fit; Blair Hill Wind Farm site lies within D&G. In terms of development typology, the proposals for 22 no. x <250m tip height turbines needs to be considered in the Very Large category (>150m):

- Under LDP2 Spatial Framework Map 8, which complies with SPP guidance, the site falls within an *Area with potential for wind farm development*, albeit in close proximity to *Areas with Significant Protection*.
- The proposed turbines lie within two landscape character types: the Glentool Fringe (LCT 16), and the Merrick Rugged Granite Uplands with Forest (LCT 21a). Neither of these were assessed for Very Large typology turbines as were not considered suitable for Large / larger typologies in the 2017 review of the DGWLCS.

1.3 National policy and guidance

1.3.1 GLVIA3; An LVIA should be undertaken in accordance with GLVIA3 (2013).

1.3.2 NatureScot guidance; The following should also be referenced in terms of the landscape, visual and cumulative assessments in the LVIA:

- Siting and Designing Wind Farms in the Landscape V3 (2017).
- General pre-application and scoping advice for onshore wind farms (May 2020), particularly with reference to Annex 2 advice on the scope of landscape and visual assessment for turbine lighting.
- Visual Representation of Windfarms (SNH, 2017).
- Spatial Planning for Onshore Wind Energy Development (2015).
- Cumulative Effects of Windfarms (SNH, 2005).
- Assessing the cumulative impact of onshore development (SNH, 2012).
- Landscape Character Assessment for Dumfries and Galloway (2019) is the updated NatureScot LCA for the region, and should be used alongside the DGWLCS, which provides more detail descriptions and guidance.
- Assessing Impacts on Wild Land Areas: Technical guidance (September 2020); and the Wild Land Areas map and descriptions (2014), with reference to 01 Merrick, and 02 Talla-Hart Fell.
- Landscape Character Assessment, Guidance for England, and Scotland (Countryside Agency & SNH, 2002), and including Topic Paper 6: Techniques and Criteria for Judging Capacity and Sensitivity

1.3.3 Other;

- NPF4.
- Onshore Wind Policy Statement, Scottish Government, most recent version.
- Visual Representation of Development Proposals, Landscape Institute (September 2019).

1.4 Study area

1.4.1 Detailed study area; The study proposed areas for the Environmental Impact Assessment are considered too tight, with respect to visual impacts. Given the prominence of Blair Hill, with wide ranging views, particularly across extensive lower lying area to the south and west, and in the local and wider context of highly sensitive landscape, visual and nighttime receptors, the study areas should be greater than those proposed. Recommended detailed study areas: landscape character 15 km (as recommended in the Scoping Report), visual day and night time at least 20 km.

2 Landscape

2.1 Landscape receptors

2.1.1 Landscape receptors; *An assessment of landscape effects deals with the effects of change and development on landscape as a resource. The concern ... is with how the proposal will affect the elements that make up the landscape, the aesthetic and perceptual aspects of the landscape and its distinctive character. The area of the landscape that should be covered in assessing landscape effects should include the site itself and the full extent of the wider landscape around it which the proposed development may influence in a significant manner. GLVIA3, 5.1 & 5.2 (2013)*

2.2.2 Scope of potential landscape effects; The siting of Blair Hill in a prominent position in transitional landscapes, with a high degree of theoretical visibility over extensive lower lying settled lowland landscapes to the west (Wigtownshire Moors) and south (Machars and Wigtownshire Bay / surroundings), and in the immediate setting of nationally and regionally designated rugged uplands (the Galloway Hills), mean that the scheme would give rise to wide ranging landscape impacts in terms of landscape character, scale and setting issues, and also landscape value.

2.2.3 Summary of anticipated landscape character effects; The ES / LVIA must test the landscape effects on individual landscape character types / units directly and indirectly affected. It is anticipated that Blair Hill has potential to give rise to significant and marginally significant direct and indirect landscape effects on the following landscape character types / units, as classified in the 2017 DGWLCS:

- The host unit: Merrick Rugged Granite Uplands with Forest (LCT 19a) – 19 turbines.
- The secondary host unit: Glentrool Upland Fringe (LCT 16) – 3 turbines.
- Adjacent unit: Merrick Rugged Granite Upland (LCT 21).
- Adjacent unit: Cairnsmore Foothills with Forest (LCT 18a).
- Adjacent unit: Cree unit of Narrow Wooded Valley (LCT 4), comprising both the Cree and Penkiln Burn valleys.
- Adjacent unit: Glentrool Plateau Moorlands with Forest (LCT 17a).
- Nearby unit: Machars Drumlin Pasture in Moss and Moor Lowland (LCT 12).
- Nearby unit: Wigtown and Cree Coastal Flats (LCT 2).
- Nearby unit (thought limited intervisibility): Palnure Narrow Wooded Valley (LCT 4).
- 10-15km range unit: Cairnsmore Coastal Granite Uplands (LCT 20).
- 10-15km range unit: Cairnharrow Foothills (LCT 18).
- 10-15km range unit: Cairnharrow Upland Fringe (LCT 16).
- 10-15km range unit: Machars Drumlin Pasture (LCT 13).

Landscape character; With respect to potential effects from Blair Hill on the landscape character units, potentially significant and marginally-significant effects are anticipated to be at short and medium ranges at up to 15 km. This is a larger range than typical, due to the prominence and wide visibility of the scheme, and that the impact of Blair Hill on the setting, scale and character of the rugged hills against which the scheme is sited plays an important role as a backdrop and skyline in the character and scenic composition of distant

landscapes. Beyond 15km range significant landscape effects may occur, but might more easily be assessed as visual effects.

Landscape effects would be cumulative with the baseline of operational and consented wind farms, which in the case of Blair Hill are for the most part at least 15 km away, and not thought to be likely to give rise to significant cumulative interactions individually; the closest are Aries and Kilgallioch to the west. However, the wider Wigtownshire Moors cluster will give rise to cumulative interactions on common landscape receptors, where Blair Hill would represent a significant addition. These are listed in section 4.

It is noted that the Scoping Report refers to the 2019 NatureScot LCA review as its primary source of landscape information for the LVIA baseline and assessment. The broader landscape character type mapping and categorisations for the DGWLCS approximates to the NatureScot 2019 LCA. However, the named units in the DGWLCS are a more detailed grain of description and the capacity study assessment and should be referred to as the primary reference in the LVIA.

2.2.4 Local landscape character; Blair Hill is in the immediate setting of a complex and small scale local landscape that forms the setting and recreational environs of Newton Stewart and Minnigaff. The Very Large size of the turbines, and their prominent position in relation to sensitive valley, fringe and upland landscapes means that a particularly high degree of significant landscape effects would be anticipated; these local landscape effects should be considered carefully in the LVIA.

Also the landscape occupied by the north west Blair Hill turbines are not typical of the Rugged Granite Uplands with Forest (LCT 19a). The turbines would occupy an open tract of the uplands, more typical of the Merrick unit of Rugged Granite Uplands (LCT 21), with which the site is continuous, lying immediately to the north. This part of the site is important in the setting of the higher summits of the Galloway Hills, the rugged mid slopes, along with Garrick Hill and Craigmurchie, provides open ground between the summits and the Cree valley, which contributes to the scenic qualities.

In this case the ES / LVIA must undertake a detailed landscape character assessment at up to approximately 5 km from the scheme, as determined by the local characteristics and key views, but as a guide bounded by: A75 bypass to Newton Stewart to the south, the A712 to the southeast, the Penkiln Burn valley up to Auchinleck, Garlick Hill to the east, Larg Hill to the north, Craigmurchie and the Loch of Cree to the west, including the Castle Stewart designed landscape and bounded by the B7027, the Challoch Moss road to the A75 to the southwest. This area incorporates landscape areas of great scenic, historic, wildlife, and recreational value to residents and visitors to the area. It is anticipated that Blair Hill has potential to give rise to significant landscape effects on this highly valued local landscape, and all measures must be taken to avoid and reduce impacts.

Features and areas to include in the more detailed landscape character assessment, but this list may not be exhaustive:

- The group of craggy Rugged Granite Upland (LCT 21) summits, comprising Larg Hill, Lamachan Hill, Curleywee, the associated tops, and upper slopes and ridges.
- The open areas of the Rugged Granite Uplands with Forest (LCT 21a), including the northwest Blair Hill site, and landmark open summits of Garlick and Craigmurchie Hills.
- The tract of Glentool Upland Fringe (LCT 16), which is a landscape where the high wildlife and cultural heritage interest contribute to the local landscape character and scenery. Notable features include relict settlements and field systems, historic deer

parcs, castle ruins, prehistoric monuments, and some of the region's iconic bluebell woods.

- Western area of Cairnsmore Foothills with Forest (LCT 18a), which is partially occupied by the Kirroughtree, Cairnsmore and Bargaly designed landscapes (NIDL), and also the Kirroughtree Forest, which is a recreational resource.
- The sensitive valley landscape of the Cree unit of Narrow Wooded Valley (LCT 4), comprising both the Cree and Penkiln Burn valleys.
- Glentool Plateau Moorlands with Forest (LCT 17a), including the historic fields over White Hill, and the designed landscapes of Castle Stewart (NIDL).
- Farmlands of the Drumlin Pasture in Moss and Moor Lowland (LCT 12) between the minor Challoch Moss road, the A75, and the Cree valley.
- Newton Stewart and Minnigaff.

The assessment should assess and mitigate against potential landscape and visual impacts on the local landscape and setting of natural and cultural landscape features, which contribute to its sense of place, local distinctiveness, and high landscape value.

2.2.5 Summary of anticipated effects on designated landscapes; The ES / LVIA must test the landscape effects on individual landscape character types / units directly and indirectly affected, and must also address the effects on how these landscape areas interact with each other, and the contribution this makes to the overall quality of the landscape: its wider character; how it is experienced in views, and the recreational, scenic and other values for residents and visitors. Blair Hill will give rise to potential landscape impacts on the designable values / special qualities of a number of important national, regional, and more local landscape-related designations, where setting issues including views to and from may also be impacted.

With respect to landscapes of national concern the Merrick WLA is a concern, and also the Galloway Hills Forest Park, which is a candidate National Park. The Galloway Hills Forest Park also broadly coincides with the Galloway Dark Sky Park.

In terms of regional designations, it is anticipated that day and nighttime effects from Blair Hill on the following Regional Scenic Areas would potentially be significant, and should be considered with respect to any key viewpoints and night-time effects:

- The Galloway Hills RSA / Galloway Forest Dark Sky Park.
- Mochrum Lochs RSA.
- The Machars Coast RSA.

With respect to RSAs reference should be made to the DGC Technical Paper; and also to the DGWLCS which covers RSAs, and other recognised aspects of landscape value under the detailed assessments for each landscape type / unit.

With respect to potential effects on other aspects of local landscape value, it is anticipated that day and nighttime effects from Blair Hill may be problematic for the following designed landscapes (Inventory and Non Inventory) would potentially be significant, and should be considered by the Blair Hill LVIA (and cultural heritage section of the ES) with respect to any designed qualities, key viewpoints, setting issues, and night-time effects:

- Garlieston House Inventory Designed Landscape (IDL), long range to the south, with potential visibility from coast and elevated outlooks. Garlieston House has promoted walking routes, so high amenity value.
- Castle Stewart Non Inventory Designed Landscape (NIDL), short range across the Cree valley, with potential outlook from more open and elevated areas. The Penninghame House estate has promoted walking routes, and possibly a hotel, so high amenity value.

- Kirroughtree NIDL, short range due south near Minnigaff, with Conifers Leisure Park and the Creebridge Hotel. Potentially high amenity value, although most of the designed landscape is likely to be enclosed from wider views north by the lie of the land.
- Cairnsmore NIDL, short-medium range south, but at least partially enclosed by intervening landform. A right of way passes through this designed landscape, so of some public amenity value.
- Bargaly NIDL, short-medium range south, and thought to be enclosed by Bargaly glen sides. Minor road up the western boundary, otherwise unknown public amenity value.
- Merton Hall NIDL, Shennanton House NIDL, and Craighlaw NIDL all lie close to the A75 at medium range to the southwest. Merton Hall appears to orientate towards the Blair Hill site, and a public right of way runs through the designed landscape. It is thought Shennanton House is enclosed by woodland without an orientation eastwards; although Blair Hill may occupy the backdrop setting to the designed landscape, as appreciated from the minor road to the west. Craighlaw Tower and designed landscape are likely to have some outlook, but it is thought no public access.
- Barholm NIDL lies at medium range to the south nearby to Creetown. Outlook is anticipated from the open areas of this designed landscape, and the public road / Old Military Road up the eastern boundary.
- Mochrum Park NIDL and Barnbarroch NIDL lie at medium-longer range to the southwest; any effects are not anticipated to be significant, but outlooks should be site verified as part of the LVIA.

2.2 DGWLCS Review

2.2.1 Scope of consideration of the DGWLCS guidance; Fit with the DGWLCS, along with LVIA assessment and assessment for cumulative issues are tests for policy IN2. The Blair Hill turbines occupy two units with nineteen turbines in the Merrick unit of Rugged Granite Uplands with Forest (LCT 21a), and three turbines in the Glentool Upland Fringe (LCT 16). Neither of these units were assessed for the effects of Very Large typologies in the 2017 DGWLCS as the previous capacity study considered these units unsuitable for Large typology turbines (<150m). As set out in 2.2.3 above the ES / LVIA must test the landscape effects on individual landscape character types / units directly and indirectly affected.

Elevation of the turbine bases are between approximately 135-375m AOD. All the turbines proposed would be up to 250m, and it is assumed likely to be more than 150m and therefore would be a Very Large typology; and should be considered as this in terms of the DGWLCS sensitivity assessments and guidance for development. The elevation of the scheme and turbine height are anticipated to give rise to scale issues with the uplands they would be seen against, which rise to at most 690m.

2.2.2 Reference to the DGWLCS for host units; The host unit would experience direct landscape effects from Blair Hill Wind Farm: the Merrick unit of Rugged Granite Uplands with Forest (LCT 21a), and the Glentool Upland Fringe (LCT 16). Blair Hill would give rise to direct landscape and visual effects for these two units.

The detailed assessment for the host unit in the DGWLCS must be fully referred to in the LVIA, regarding baseline descriptions but also the sensitivity assessment and guidance in relation to Very Large typologies. The LVIA must refer to: the description and summary of sensitivity, cumulative issues, opportunities, constraints, guidance on development, and the detailed guidance table across the landscape sensitivity criteria. The key findings of the

study are also useful in terms of the broader regional picture, and strategic guidance.

From a brief desk review of the information, it is likely that the open area of the Merrick Rugged Uplands with Forest proposed to be occupied by eight of the Blair Hill turbines is not typical; these open slopes are more similar to the adjacent area of Merrick Rugged Uplands (LCT 21). As such this unit should also be fully referred to in terms of the LVIA, and assessed in detail on site.

The Glentool Upland Fringe (LCT 16) proposed for development is typical of the description and High sensitivities of the Upland Fringes (LCT 16): forming a highly visible ‘edge’ landscape that provides a backdrop to adjacent valleys and slopes; featuring rich archaeological and historic heritage; with notably diverse and extensive broadleaved woodland in the immediate vicinity of the proposed turbines; forming an attractive setting to designed landscapes and settlements; and the foreground to the Merrick group of uplands.

2.2.3 Reference to the DGWLCS with respect to indirect effects; Indirect landscape and visual effects on the other units within 20 km should also be considered assessing Blair Hill Wind Farm regarding the DGWLCS guidance.

Where there is potential for significant indirect landscape, visual, and cumulative effects with more distant landscapes with extensive visibility and / or sensitive receptors, reference to the DGWLCS should be made in terms of any specific guidance for development on indirect and visual effects, and detailed assessments for landscape context and visual sensitivities for these units.

The Blair Hill site is immediately adjacent to a number of other units, such that there would also be perceptibly direct, although technically indirect landscape effects, as well as visual effects for: Merrick Rugged Granite Upland (LCT 21), Cairnsmore Foothills with Forest (LCT 18a), Cree unit of Narrow Wooded Valley (LCT 4), and Glentool Plateau Moorlands with Forest (LCT 17a).

Given the wide range of theoretical intervisibility and role of the Blair Hill site in the contribution to wider landscape character and scenery, there would also be potential for indirect landscape and visual effects for landscapes at up to 15km: Machars Drumlin Pasture in Moss and Moor Lowland (LCT 12), Wigtown and Cree Coastal Flats (LCT 2), Cairnsmore Coastal Granite Uplands (LCT 20), Cairnharrow Foothills (LCT 18), Cairnharrow Upland Fringe (LCT 16), and Machars Drumlin Pasture (LCT 13).

3 Visual Matters and Representative Viewpoints

3.1 Visual receptors

3.1.1 Visual receptors; *An assessment of visual effects deals with the effects of change and development on the views available to people and their visual amenity. The concern ... is with assessing how the surroundings of individuals or groups of people may be specifically affected by changes in the content and character of views. ... Scoping should identify the area that needs to be covered in assessing visual effects, the range of people who may be affected by these effects and the related viewpoints in the study area that will need to be examined.* GLVIA, 6.1 & 6.2 (2013)

3.1.2 Anticipated significant and marginally-significant daytime visual effects; It is anticipated that Blair Hill Wind Farm would potentially give rise to a range of significant and marginally-significant daytime visual effects on the following receptors.

- Residential receptors: local properties dispersed, in hamlets and small settlements, generally within 3km, but possibly up to 6km if properties orientate to the site. The

effects on the views, outlook and visual amenity should be assessed from all properties within at least 2 km in the RVVA and also sampled at this and longer ranges in the LVIA, particularly where properties coincide with other public interests.

- Hill walkers; visual, combined cumulative visual, and sequential cumulative visual effects for walkers on key routes in the Galloway Hills, including hill routes up Lamachan and Curleywee, the Rhinns of Kells, particularly to the south such as Meikle Millyea, and also the Merrick hill route to Glentool.
- SUW walkers where outlooks to the Galloway Hills remain a feature of the route, locally over Glenvernoch Fell and crossing the upper Cree valley; and potentially in to the longer range. SUW walkers are considered high sensitivity. The effects on the views, outlook, and visual amenity should be assessed from representative viewpoints for specific important views and reveals, and also with a sequential assessment.
- Other recreators and visitors to the Galloway Forest Park, using the visitor centres and promoted routes through the forest and its environs. Galloway Forest Park visitors are considered high sensitivity. The effects on the views, outlook, and visual amenity should be assessed from representative viewpoints for specific important views and reveals, and key destinations.
- Visitors staying in Newton Stewart, Minnigaff, or the various hotels and leisure centres in the wider environs. Such visitors are considered highly sensitive, but may for the most part be covered by representational viewpoints for residents.
- Caravan and camping park visitors for tourists to Newton Stewart, Wigtownshire Bay and Machar areas. The visitors and recreators using these sites are considered high sensitivity. The effects on the views, outlook, and visual amenity for visitors should be assessed in the LVIA from representative viewpoints.
- Walkers in and around Newton Stewart: walkers along the Wild Wood and Torwhinnoch Hill paths; Knockman Wood and Cree Valley paths; the Kirroughtree Walks; the Penninghame Ponds path; visitors to the annual Newton Stewart Walking Festival;
- Other recreators in and around Newton Stewart and Minnigaff, including: the golf course; cyclists on NCR7 through the Cree valley, and the Newton Stewart Cycle Path South; walkers and cyclists using the network of country roads and forest trails for quiet recreation; people enjoying the riverside; wild life visitors, including to Cree Woods Nature Reserves, and visitors to the spring blue bell woods. Recreators are considered high sensitivity. The effects on the views, outlook, and visual amenity should be assessed from representative viewpoints for specific important views and reveals, and also with a sequential assessment for key routes such as NCR7, and potentially popular paths.
- Walkers in the longer ranges: to the south around Wigtown Bay, including the Garlieston Innerwell path, the Wigtown Harbour path, Creetown to Bagbie and Kirkmabreck; also to the west and southwest over the Machars the public footpath along the Old Military Road (north of the A75), and the Gass Moor path.
- Travellers, including recreational and scenic drivers on the main roads passing through the Newton Stewart, Machars, Galloway Forest, and Wigtownshire Moors area, including the A75 between Carsluith Castle and Barlae; the A14 between the Dumfries border and Wigtown; the A712 / Queensway between Craigdistant and Newton Stewart; the B7027 where open outlook allows, from the Dumfries border to Challoch; the A746 between Whithorn and Wigtown; the B7004 between Garlieston and the A746 junction; and the B7085 between Monteith House and the junction with the A746.

Visual effects would be cumulative with the baseline of operational and consented wind farms, which in the case of Blair Hill are for the most part at least 15 km away, and not thought to be likely to give rise to significant cumulative interactions individually in-

combination; the closest are Aries and Kilgallioch to the west. However, the wider Wigtownshire Moors cluster will give rise to cumulative interactions on common visual receptors, where Blair Hill would represent a significant addition in-succession (on turning the head). Also there is considerable scope for cumulative visual sequential effects from Blair Hill, as the scheme is seen repeatedly along key routes; or the scheme in addition to other schemes. These possibilities are listed in section 4.

3.1.3 Anticipated significant and marginally-significant night-time visual effects; It is anticipated that Blair Hill Wind Farm would potentially give rise to a range of significant and marginally-significant night-time visual effects, for sensitive residential and recreational receptors; which may be similar as for daytime effects but are not necessarily the same.

The following receptors would be sensitive to aviation lighting on dark skies:

- Residential viewpoints; particularly Newton Stewart and Minnigaff, but also more distant settlements such as Creetown Wigtown, Kirkcowan, smaller villages and hamlets across the Machars, and also including dispersed properties across the Machars and Wigtownshire Moors at medium to longer range.
- Caravan parks, chalet, and camping sites in and around Newton Stewart and at longer range around Wigtownshire Bay.
- Galloway Dark Sky Park, including recreational facilities such as visitor centres, and promoted routes.
- The Merrick Wild Land Area, including the Merrick hill path, and other routes up popular summits.
- SUW viewpoints, such as Glenvernoch Fell, and potentially important outlooks at longer range.

These effects would be cumulative with lighting for schemes further west in the Wigtownshire Moors, Kilgallioch Extension, Artfield Forest, and Stranoch. Blair Hill would give rise to significant additional impacts on

The night-time effects should be assessed through the LVIA, with visualisations from selected viewpoints and assessment methodology as set out in the NatureScot scoping requirements (May 2020), set out below.

3.2 Comments / requests for day time representative viewpoints / sequential assessments

3.2.1 Proposed representational viewpoints, with comments; The twelve scoping list of proposed representative viewpoints:

Proposed viewpoints	DGC comments; also see 3.2.2
1 Drumwhirn Cairn, 2.6km SW RSPB Reserve visitors, NCR7. Minor road.	Agree. Photomontage.
2 Corsbie Road, Newton Stewart, 4.1km S Visitors, residents NW edge Newton Stewart.	Agree. Photomontage. Potentially others required to represent Newton Stewart.
3 A75 S of Newton Stewart, 4.7km S Visitors and residents of Newton Stewart, NCR 73, A75 users.	Agree. Photomontage.
4 Glenvernoch Fell, Hill of Ochiltree, 7.6km W SUW walkers	Agree. Photomontage. Potentially other SUW representation.
5 NCR 7 N of Glentrool, 7.9km NW Visitors and residents of Glentrool village, users NCR 7, recreators in the Galloway Forest.	Agree, potentially try wireline in first instance.

6 Cairnsmore of Fleet, 8.4km E Hill walkers.	Agree. Photomontage.
7 Merrick, 11.5km N WLA, Dark Sky Park, hill walkers.	Agree. Check if Benyellary a wcs. Photomontage or wireline.
8 A75 near Creetown, 12.3km S A75 travellers, residents of Creetown.	Agree. Photomontage. Also wireline Carsluith Castle.
9 Kirkcowan, 12.6km SW Kirkcowan visitors and residents, minor roads used by residents and recreators.	Agree. Check how open. If enclosed then wireline only.
10 NCR 73, minor road N of Wigtown, 13.3km S Wigtown visitors and residents, cyclists	Agree, photomontage; and / or the A714 representative VP N of Wigtown
11 Bennieguinea Lookout, 14.2km E	Unsure, not familiar with public use. Possibly wireline.
12 Mochrum Lochs, 19km SW RSA, minor roads over Gagrie Moor.	Check. Potentially wireline only. Check alternative core path to N.
14 SUW near Artfield Fell, 19.6km W SUW walkers.	Check. Potentially wireline only.
15 A746 N of Whithorn, 28.5km S Whithorn residents and visitors, road users.	Check. Potentially wireline only, and / or B7004.
17 A712 E of Corsock, 36.5km E A712 to the east.	Disagree. Too distant with intervening landform.
18 SUW near Stranraer, 37.6km SW	Disagree. Too distant with intervening landform and dev't.
19 Sandhead, 37.8km W North Rhins residents and visitors.	Check. Potentially wireline if relevant.
20 Minnigaff Church, 2.9km S	Agree. Photomontage.
21 Lamachan Hill, 3.1km NE	Agree. Photomontage.
22 Millfore, 5.4km NE	Agree. Photomontage.
23 Coreserine, 14.9km NE, wirelines only	Agree. Wireline.

3.2.2 DGC additionally requested viewpoints; The following additional viewpoints are requested. Recommendations regarding full visualisation or wireline made. Wirelines should show operational and consented schemes.

Suggested viewpoints	DGC comments
Robert Duncan	
Challoch Church / graveyard	Agree. Photomontage
More from SUW	Check with wirelines. VPs 4 and 14 possibly adequate for photomontage visualisation.
Lower Queensway, A712 near Newton Stewart.	Agree. Photomontage. Check, but possibly GR: 44 2 67 8.
A714 north.	Agree. Photomontage, or potentially wireline. Check, but possibly along the northern approaches to Whitecairn, and / or Creebank Cottage.
A714 south.	Agree. Photomontage, as additional or alternative to VP 10. Check, but possibly GR: 42 3 60 8.
Wigtown Conservation Area, Kirkland Hill.	Agree. Photomontage. Potentially Martyr's Monument, GR 43 1 55 5.
Janet Swailes	
Wigtown / Wigtown Bay frontage.	Wigtown Harbour core path / hide, GR: 44 0 54 9, or picnic site, GR: 42 7 55 7, or Lover's Walk, GR: 43 3 56 0. Photomontage from wcs.

A75 west.	Check for worst case scenarios / wcs travelling east from Barlae, potentially approx. GR: 29 3 61 1, and GR: 32 5 62 9. Check wcs, one photomontage and the other wireline.
A75 east.	Typical representative viewpoints include the ramparts of Carsluith Castle, and also the layby at Point Fishery. Check VP 8 and depending on wcs, one photomontage and other wirelines.
Knockman Woods.	Look for wcs, potentially GR: 40 8 68 4. Photomontage.
Garlies Wood	Look for wcs, potentially GR: 42 2 68 9. Photomontage.
Craigeach Fell / core path (N of VP 12).	GR: 31 9 56 5. Wireline.
Minor road from Spittal northwards.	Representation from Machars roads, potentially setting of Newton Stewart & Minnigaff, Galloway Hills backdrop. GR: 36 4 60 4, & / or Culbratton, GR: 39 0 62 9. Photomontage from wcs.
B7004 Garlieston northwestward, or Innerwell Fishery approach.	Worst case scenario from Garlieston area: B7004 / proxy for Innerwell core path. GR: 47 5 49 2. Wirelines.
B7085 northwards, near Kirkland of Longcastle.	Representation from Machars roads, and properties, long views to the Galloway Hills. GR: 37 7 47 5.
Cruggleton Castle / Point.	Wireline.
Meikle Millyea.	Wireline.
Benyellary, Merrick path, descent.	Outlook south from Merrick descent. GR: 41 5 83 9. Check VP 7, and do photomontage of wcs, wireline of other.
Representation from local designed landscapes, Castle Stewart, Merton Hall, and Kirroughtree.	Castle Stewart, Penninghame Estate pond, promoted walks, GR: 37 4 69 3. Merton Hall, footpath: GR: 38 3 64 0. Kirroughtree / golf course, GR: 41 9 66 2. Wirelines from all these, photomontage wcs.
B7207 Merrick viewpoint, approximately around the DGC border.	Relationship to the Merrick summit in longer range views. GR: 75 6 28 9.

3.2.3 DGC requested sequential visual assessments; Sequential cumulative effects are those that arise from Blair Hill as experienced sequentially along a route; and also Blair Hill in addition to other wind farm development along the route. The frequency and degree of effects determine significance. Sequential visual assessments should be undertaken in the LVIA for the following key routes:

Routes for sequential assessment	DGC comments
A75 between Glenluce and Newton Stewart, and Carsluith and Newton Stewart, in both directions as far as relevant.	Sequential assessment for Blair Hill in itself, and also other development, likely to include: Carscreugh and Barlockart Moor; and more distant Wigtownshire Moors schemes in long range views from the south, Aries, Glenchamber, Artfield Fell.
A714 between the DGC border to the north and Wigtown in the south, in both directions as far as relevant.	Sequential assessment for Blair Hill in itself, and also other development, likely to include: scoping schemes Balunton and Glenvernoch; and more distant Wigtownshire Moors schemes in long range views from the east, Kilgallioch and Aries.

NCR 7 between Cairnfore on the DGC border to the north, and Creetown in the south, in both directions as far as relevant.	Sequential assessment for Blair Hill in itself, and also any other development, thought unlikely to include other schemes.
Consider popular hill routes in the Galloway Forest Park, eg. The Merrick path between the summit and descent to Culsharg.	Sequential assessment for Blair Hill in itself, and other development, likely to include scoping schemes Balunton and Glenvernoch, and more distant Wigtownshire Moors schemes.

With respect to a format / method of sequential assessments the recent application for Loganhead could be referred to.

3.2.4 Visualisations; please provide the following for the above to meet NatureScot (2017 and 2020) and LI (2019) guidance:

- Cumulative wirelines, with other existing, consented, in-planning windfarms / wind turbines labelled / numbered
- Photomontage / cumulative photomontage, with existing and consented windfarms / wind turbines labelled / numbered
- Visualisations to show aviation lighting, for an agreed list of sensitive viewpoints
- ZTV to show areas affected by aviation lighting

Site work for DGC landscape input is limited at preapp and scoping due to resources. The viewpoint lists provided reflect interpretation of a variety of data bases, as well as interpretation of the ZTV and OS maps. The total number of viewpoints recommended varies from scheme to scheme and reflects sensitive receptors, the topographic complexity of the landscape and associated visual inter-relationships and anticipated cumulative issues. Recommended types of visualisations reflect their use and likely stakeholder interest. The balance of representation across distance ranges is determined by the sensitivities of an area and anticipated significant effects. Inclusion of representation, at least by wireline, for highly sensitive receptors may be recommended, even where effects are not anticipated to be significant, for demonstration purposes.

Please note the following general points regarding proportionality of approach with respect to viewpoint selection:

- The viewpoint list provided by DGC represents the range of anticipated receptors for a scheme and it is expected the Developer will refine this, given the more in depth site knowledge their own work entails.
- Where two viewpoints are close together, it may be that one of these is a worst case scenario (wcs) and is chosen to represent both. Alternatively, both may have a role for different functions; as representative, specific, or illustrative, or sequential viewpoints.
- Inclusion of private residential properties is recommended by DGC within 2km of schemes, and possibly more where specific cumulative issues are anticipated. This is considered appropriate given much of the rural area is characterized by a dispersed settlement pattern, which at times can be quite dense. Limiting representative viewpoints to designated settlements would not always provide the Authority or local people the opportunity to understand potential / likely effects.
- The visual effects assessments are sometimes carried out as part of a residential amenity assessment, in which case this will supplement the normal LVIA for a project.
- Residential properties can also provide representation for the minor road and core path networks, and the wider public amenity. More distant residential receptors can be included as a focus for representation of such other interests.

- It is recommended that the Developer review all the identified viewpoints and decide on the most appropriate to do full assessments and visualisations for. To do this all the viewpoints should be site checked to help determine the most representative and worst case scenarios. This initial assessment could form an Appendix in the ES, and baseline photographs usefully provided to illustrate the key points.
- *Visual receptors, and views that have been identified as unlikely to experience significant visual effects either at scoping or in establishing the baseline should not be included in the detail reporting but should be noted, with reasons given for their exclusion.* GLVIA 3, 6.24 (2013)

3.3 Comments / requests for nighttime assessments

3.3.1 Aviation lighting visualisations and assessment; The NatureScot scoping requirements (May 2020) are noted regarding the requirements for information on aviation lighting as set out in Annex 2. Please provide:

- A ZTV should be produced showing areas that would be affected by aviation lighting.
- Wirelines indicating the effects of aviation lighting for each turbine for every viewpoint, marking the position of any aviation lighting.
- Assessment of aviation lighting for each representative viewpoint; and sequential effects along the SUW.
- Full aviation lighting photomontage visualizations for particularly sensitive receptors such as:
 - Residential interest including dispersed properties and larger settlements.
 - Recreational interest sensitive to dark skies and lighting issues, the SUW, Merrick hill route and other popular paths, NCR7.
 - Galloway Forest Dark Sky Park.
 - Landscapes sensitive to aviation lighting: Galloway Hills RSA, Machars Coast RSA, Mochrum Lochs RSA, Merrick WLA.
 - Other recognised remote or otherwise sensitive areas.
- Future full photomontage visualisations for any of the viewpoints as indicated as being required based on wireline information.

3.3.2 Night-time representative viewpoints for photomontage visualisations; No proposed nighttime visualisations have been nominated yet. It is noted that NatureScot generally recommends three or four. However, in this case more may be required given the prominence of the turbines and also the large number and spread of sensitive nighttime receptors, including two nationally valued landscapes: the Galloway Forest Dark Sky Park and the Merrick WLA. It is noted that the Galloway Forest Park and surroundings is also being considered as one of the candidate National Parks.

Based on the combination of VPs and further DGC recommendations, initial thoughts:

- Newton Stewart and Minnigaff
- Wigtown
- A75 travelling northwest, possibly Fishery Point, or VP 8.
- A75 travelling east from Barlae, potentially approx. GR: 29 3 61 1, and GR: 32 5 62 9. Check wcs.
- A712 / Queensway approaching Newton Stewart, possibly GR: 44 2 67 8.
- Challoch Church.

3.3.3 Cumulative nighttime effects; There are a number of consented lit schemes in the Wigtownshire Moor cluster, Stranoch 2, Kilgallioch Extension, Artfield Forest; and with in-planning Mid Moile which would also be lit.

The LVIA must undertake a cumulative assessment of Blair Hill in addition to these schemes in relation to sensitive nighttime receptors, particularly the Galloway Forest Dark Skies Park / Merrick WLA / Galloway Hills RSA, where it is anticipated cumulative interactions would occur, and that Blair Hill would be a significant addition.

3.3.4 Mitigation measures; With respect to applicant information the LVIA must comply fully with the NatureScot guidance (2020), see 3.3.1 above. The LVIA must also come forwards in the first application with a full scheme of mitigation for aviation lighting, including:

- Radar activated lighting if available.
- A reduced lighting scheme with cardinal turbines only lit and visible tower lights avoided.
- Reduced lighting intensity to respond to conditions / visibility; lights dimming from 2000cd to 200cd when visibility >5km.
- Light buffers to focus lighting upwards.

Sufficient information must be provided to assess the positive benefits of these mitigation measures across a range of receptors. This should include photomontage visualisations and lighting intensity ZTVs.

4 Cumulative

4.1 Cumulative context

4.1.1 Overview; Blair Hill is well-separated from other operational and consented wind farm schemes. Operational and consented schemes in the Wigtownshire Moors cluster are in the case of Blair Hill for the most part at least 15 km away, and not thought to be likely to give rise to significant cumulative interactions individually; the closest are operational Aries and Kilgallioch, and consented Kilgallioch Extension, all to the west. However the wider Wigtownshire Moors cluster will give rise to cumulative interactions on common landscape and visual receptors, where Blair Hill would represent a significant addition.

4.1.2 Scoping schemes; There are two other scoping schemes, Balunton and Glenvernoch, which while at >5km from Blair Hill should be considered in the cumulative considerations as they would give rise to potentially cumulative daytime and nighttime impacts and are coming through the planning system at the same time. GLVIA3 gives provision for including scoping schemes, where the local authority considers it absolutely necessary. I do in this case in order to gauge setting impacts on the Galloway Hills, including views in to the hills and views from them.

4.1.3 Approach to cumulative assessment, method and reporting; LVIA's take different approaches to the cumulative assessments. Where operational schemes are assessed in the LVIA, commentary should still be brought forwards into the cumulative assessment regarding how a proposal would add cumulatively to this baseline, even if the 'counting' per se is undertaken at the LVIA stage. It is the nature of effects and merits of the proposed scheme that requires to be brought out, so that impacts and potential mitigation can be fully understood and optimised.

Depending on the approach to the cumulative assessment a development scenario with all in-application schemes should also be included in the cumulative assessment. With the exception of Blair Hill, it is thought that there are no outstanding in-planning schemes that need to be considered in the Wigtownshire Moors and wider area, but this should be confirmed with the DGC planning officer.

4.2 Cumulative impacts

4.2.1 Policy and guidance; The LVIA should fully assess all scenarios of potential cumulative effects under LDP2 policy IN2, and with reference to the DGC SG WED (2019), and NatureScot cumulative (2012) and siting and design (2017) guidance.

There are two main aspects of cumulative impacts, anticipated to be significant, and that should be fully covered in the Blair Hill LVIA. It is noted that neither of these are generally well addressed by LVIAs, and if required further guidance can be provided.

4.2.2 Wind farm pattern; Blair Hill would not relate to the existing wind farm pattern; there are no operational or consented schemes either associated with the Galloway Hills or the Wigtown Bay area; the closest other development associated with the Wigtownshire Moors cluster >15km distant. The LVIA must test the fit of Blair Hill with the committed wind farm pattern, based on the specific guidance and criteria tests set out in DGC LDP2 Supplementary Guidance (2019), Patterns of Development, paras D8-D11.

The Blair Hill site is not included in the units assessed under 3.4 as part of the Wigtownshire Moors cluster in the DGWLCS. It does lie close to the Glentroll unit of Plateau Moorland with Forest unit. The guidance identifies the proximity to the Merrick WLA, smaller scale more diverse landscapes such as the Cree valley, and Archaeologically Sensitive Areas as being limitations to development; and also identifies the potential for cumulative sequential effects from the A75.

4.2.3 Cumulative sequential assessment; Significant sequential cumulative visual effects anticipated to arise from Blair Hill as experienced sequentially along the important tourist and scenic routes: the A75, the A714, NCR7 and the Merrick hill route. At times the sequential effects would be exacerbated by the effects of other schemes, and these are set out in section 3.2.3. The frequency and degree of effects determine significance.

4.2.3 Other cumulative impacts; The LVIA must report on all cumulative interactions with operational, consented, in-planning, and where *absolutely necessary*, scoping schemes.

With respect to other cumulative landscape and visual effects; see 2.2.3 and 3.1.2 respectively. above. Cumulative effects would be cumulative with the baseline of operational and consented wind farms, which in the case of Blair Hill are for the most part at least 15 km away, and not thought to be likely to give rise to significant cumulative interactions individually; the closest are Aries and Kilgallioch to the west. However the wider Wigtownshire Moors cluster will give rise to cumulative interactions on common receptors, where Blair Hill would represent a significant addition.

Scoping schemes Balunton and Glenvernoch should also be considered given the potential for cumulative interactions on sensitive Galloway Hills receptors, and that they are progressing through the planning system at a similar time.

4.2.4 Cumulative nighttime effects; See 3.3.3 above. There are a number of consented lit schemes in the Wigtownshire Moor cluster, Stranoch 2, Kilgallioch Extension, Artfield Forest; and with in-planning Mid Moile which would also be lit. The LVIA must undertake a cumulative assessment of Blair Hill in addition to these schemes in relation to sensitive nighttime receptors, particularly the Galloway Forest Dark Skies Park / Merrick WLA / Galloway Hills RSA, where it is anticipated cumulative interactions would occur, and that Blair Hill would be a significant addition.

5 Design issues

5.1 Siting and design

5.1.1 Key design viewpoints; It is recommended that alternative scenarios of both the wind farm footprint and turbine size are tested through an iterative design process, using comparative ZTVs and wire lines, with turbines numbered, to scope out the extent and ranges of turbine heights avoiding the most harmful effects. This is considered particularly important for Blair Hill.

5.1.2 Turbine size; The proposed 250m Blair Hill turbines have potential for poor fit with the local receiving landscape (Rugged Granite Uplands with Forest LCT 21a, and Glentool Upland Fringe LCT 16) and nearby highly sensitive landscapes (particularly the Cree Narrow Wooded Valley LCT 4 and Merrick Rugged Granite Uplands LCT 21); with dominant and potentially overwhelming visual influence over a range of local and highly sensitive residential and recreational visual receptors.

Scenarios of alternative turbine heights should be tested in local and wider views. Alternative turbine heights, and specifically below 150m should be tested in relation to receptors that would be sensitive to aviation lighting to avoid / minimize such effects.

Wind farm layout and image; Blair Hill is proposed across fringe and upland slopes, which orientate south, southwest, and west, and are subdivided by forest blocks, the Blair Hill turbines do not occupy a logical or clearly contained site. The layout and relationship to underlying landform would be unlikely to present a balanced wind farm image. Elevation of the turbine bases are between approximately 135-375m AOD.

Micrositing; 75m micrositing allowance is considered too wide a tolerance given the small scale, complexity and intrinsic values of the receiving landscape throughout:

- Lower turbines occupy a historic moorland at the valley transition, where historic features and setting issues are anticipated; precise placing of any turbines would need tight control.
- The upper turbines are in a larger scale forested or more rugged open upland landscapes. Again the precise placing of turbines requires close control; in this case due to the relationship of the turbines to the outlines of various Galloway Hill landscape summits and distinctive silhouettes as appreciated in views towards the hills from the south, southwest and west, and views from the hills looking westwards and southwards.

5.2 Lighting issues

5.2.1 Aviation lighting; The proposed Very Large turbines would require hub height visible aviation lighting, and possibly other lights mid tower.

The effects of any required lighting should be visualized and assessed as set out in 3.3. Any residential properties within 3km of a lit turbine should also be assessed and with representative visualizations, given night lighting would be a significant change from the existing scenario.

5.2.2 Mitigation; Alternatives should be explored with respect to potential lighting options. This is an evolving area of technology and practice, but for example variable brightness lighting, and radar activated lighting.

5.3 Access and other infrastructure

5.3.1 Access; Access to and within the site should be assessed in terms of impacts; along with the Abnormal Loads Route / options, indicating any requirements in terms of road

upgrades at corners, boundary and verge treatments, bridges, tree works and access points etc., along with detail design proposals for these. Photomontage visualisations should show the proposals.

5.3.2 Other infrastructure; Other compounds, substations, site offices, batching plants, borrow pits etc. should be assessed in terms of impacts; indicating any requirements in terms of architectural and engineered structures or ground works, boundary treatments, tree works, proposed screening etc., along with detail design proposals for these. Photomontage visualisations should show the proposals for these elements, where they would be seen from the representational viewpoints.