MINUTES

Blair Hill Wind Farm
Community Liaison Group (CLG)

09/04/24
7pm - 9.00pm

Attendees	Name	Representing
	Clifford Smithers (CS)	Cree Valley Community Council
	Mary Harkness (MH)	Kirkcowan Community Council
	Jamie Hyslop (JH)	River Cree District Salmon Fishery Board
	Alan Howatson (AH)	River Cree Hatchery & Habitat Trust SCIO
	Terence Flanagan (TF)	River Cree Hatchery & Habitat Trust SCIO
	Sarah More (SM)	Cree Valley Area Development Trust
	Craig McMilken (CM)	Ditch the Blair Hill Project
	Iain Service (IS)	Ditch the Blair Hill Project
	Scott Jones (SJ)	Machars and Cree Valley Climate Action Network
	Linda Woodfield (LW)	Newton Stewart Initiative
	Sarah McArthur (SMc)	RES
	Carey Green (CG)	RES
	Beth Gray (BG)	SLR Consulting
	Dario Ewing (DE)	Cavendish
Apologies	**Name**	**Representing**
	Hazel Matthews	Kirkcowan Community Council
	Cllr Katie Hagmann	Ward member for D&G Galloway and Wigtown West
	Cllr David Inglis	Ward member for D&G Galloway and Wigtown West
	Cllr Jackie McCamon	Ward member for D&G Galloway and Wigtown West
	Cllr Richard Marsh	Ward member for D&G Galloway and Wigtown West

Agenda Item	Activity	Actions
Welcome, introductions & apologies	CG, BG & DE introduced themselves as members of the project team.	
Project Update	SMc updated that the site surveys have been completed and RES are close to finalising the site layout. The EIA will then be undertaken before submitting the planning application in the summer. SMc updated that RES are preparing for the second round of public consultations and are seeking feedback from the CLG on the information to be presented at the exhibitions.	
Guest Speaker – Cultural Heritage Expert.	BG delivered a presentation on the heritage of the site, outlining the identified historical assets and illustrating how the project's design has evolved in consideration of those assets. A copy of the presentation is appended to these minutes. SJ emphasised the significance of acknowledging the lived experience associated with the area's heritage and queried whether SLR had collaborated with the Galloway and Southern Ayrshire Biosphere concerning this matter. BG and SMc noted the comment and confirmed that Biosphere has been consulted as part of the Scoping request, however they did not provide a response. JH referenced a passage from the response received from HES in the Scoping Report and enquired about the measures proposed in the project's design to accommodate these comments. In response, BG explained that the project had gone through several layout iterations to specifically address the feedback provided by HES. BG advised that HES had undertaken a site visit and had a meeting with RES/ SLR to discuss the project. CM queried whether SLR had undertaken an evaluation to determine the suitability of the site for wind farm development. In response, BG advised that they were involved in the site feasibility and clarified that this was the responsibility of the Scottish Ministers assessing the application, who would need to consider the assessments made both by RES (via SLR) and HES. IS emphasised his view that industrialisation and heavy machinery had yet to touch the site and the importance of preserving the entirety of assets on the site. He stated that on the first edition OS map, the Deil's Dyke, a late Roman boundary feature, is shown traversing the site and appears to pass very close to a proposed turbine base in the commercial forestry. The CLG concluded that they would like a LiDAR survey to be conducted as a condition of consent, to be included in the Schedule of Commitments, and this was agreed by RES.	

Public Exhibitions	SMc offered further context on the upcoming exhibitions, to be held on 21st May from 3pm to 8pm at the McMillan Hall in Newton Stewart and on 22nd May from 3pm to 8pm at St Couans Hall in Kirkcowan. RES provided a handout of the proposed exhibition content and invited feedback from the CLG members. A copy of the handout is appended to these minutes.	
	JH stressed the importance of presenting new information at the second round of consultation with particular emphasis on the number of viewpoints presented. SMc responded by stating that viewpoints comparing the old and new designs would be included to demonstrate the evolution of the scheme informed by consultation. SMc also agreed that RES would share the list of viewpoints to be assessed in the Environmental Impact Assessment, as agreed with statutory consultees, and proposed viewpoints to be shown at the exhibitions with the CLG. Members could feedback on which viewpoints they would like presented at the exhibition. It was agreed that RES would follow up with the CLG via email to coordinate this process.	RES
	Some CLG members felt that the presentation of information on comparisons between the preliminary and updated designs was not required. RES advised that most of the exhibition content would comprise new and updated information, however, showing information on design evolution, particularly in response to feedback, was also important.	
	CM asked if the Traffic and Transport information would include the access route which RES confirmed this would be included.	
	CM questioned if the information presented on traffic and transport would include detailed modelling on the impact of construction traffic. SMc said that while an overview of the information would be provided at the exhibition, the detailed modelling would be completed for the EIA.	
	Following the request by RES, the members of the CLG agreed to assist in promoting the exhibitions within their respective communities.	
	CM enquired about the inclusion of details regarding the carbon assessment of the development in the upcoming consultations. SMc clarified that while the comprehensive assessments would not be finalised for the consultation, RES would present the methodology that will be employed to conduct the assessment.	

Grid Connection & Markets	RES provided a written response to the questions raised by IS ahead of the previous meeting. The written response is appended to these minutes. IS expressed his concerns that information on the grid connection offer to RES was an important consideration for the local community and requested more information on when RES intended to apply for a grid connection. SMc stated that an application should be made in the next six weeks and that it would take at least a further 3 months for an offer to be made. SMc undertook to inform the CLG when the application is made and details of the offer accepted by RES. IS raised concerns about the possibility of wind farms being abandoned if developers cease operations. SMc assured that wind farms cannot legally be left inoperable. Most planning consents will carry a condition whereby a wind farm must be decommissioned if it has been inoperable for a certain period. Decommissioning agreements and bonds are typically entered into, which serve as financial assurances to cover the costs of dismantling infrastructure and restoring the land once the wind farm's operational life concludes.	
Guest Speaker	It was agreed that RES would arrange a speaker, subject to availability, from Biggar Economics to present on the socio-economic and tourism assessment for Blair Hill. RES will also arrange for a guest speaker to present on construction and pollution control.	
Date and Time of Next meeting	SMc noted that local ward councillors have expressed interest in attending the CLG meetings and requested if multiple dates could be offered for the upcoming meeting. The CLG agreed to propose either June 4th or June 18th at 7:00pm as options for the next meeting to be held in-person. RES to book venue. The meeting concluded at 9:00 pm.	RES

The below questions were received by RES from Ditch the Blair Hill Project on 28/03/24.

One of the display boards produced by RES for the October public consultations at the Macmillan Hall and Wigtown County Buildings included the statement;

" With the rising cost of living and climate emergency, it is imperative that we deliver electricity efficiently and at the lowest cost to the consumer"

DTBHP agree with this statement, but, having studied the facts that are available to us, we are confident that the Blair Hill project is not capable of delivering low cost electricity to the consumer. Our questions, on Grid Connection, and Net Zero Market Reform give RES the opportunity to produce fresh facts to correct us, if we are wrong.

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GRID CONNECTION

DTBHP realise that the local Transmission Operator, SPEN are legally bound to make a "connection offer" to RES for the Blair Hill project should RES request one. However "an offer" could stipulate a date well in the future and be curtailed in capacity to such an extent that it renders investing in the Blair Hill project unviable

In answer to our first grid connection question, RES stated that "they expect to receive an offer from SPEN to connect the project to a substation at Glenlee, about 20km from the site, along a new 132KVA overhead line, following existing grid routes where possible."

We do not believe that any such offer is very likely to be made for the following reasons.

1) The Glenlee substation is currently being upgraded, the works involved have not been completed because the necessary planning application, first lodged in 2019, has yet to be approved. The site plans drawn up by SPEN for the current Glenlee upgrade indicate that there will be no space left for a third overhead 132KVA circuit to access the substation from the direction of Newton Stewart. The current SPEN KTR plan is to divert the two existing 132KVA overhead lines before reconnecting them to the substation from the west without interfering with the penstock of the Glenlee Hydroelectric Plant. A further expansion and modification of the electrical plant at the substation to accommodate a 132KVA overhead power line from the Blair Hill project would be impossible without relocating the entire

compound, away from the constricted space it currently occupies adjacent to the Drax owned hydroelectric plant and its associated penstock. It is highly unlikely that SPEN would be prepared to even consider reconfiguring the Glenlee site so soon after pleading to the local residents and the relevant authorities that the detailed substation design contained in the KTR project planning application documents had been carefully thought through and was future proofed to be fit for purpose.

2) The 1989 Electricity Act imposes upon SPEN a statutory duty to "have regard to the desirability of preserving natural beauty, of conserving fauna, fauna, and geological or physiographical features of special interest", and, " to do what it reasonably can to mitigate any effects which the proposal would have on the natural beauty of the countryside".

RES is expecting to be allowed to run a set of 132KVA overhead power lines for a distance of 25km, through the Galloway Forest Park, close to, and parallel to the existing set of 132KVA power lines running from the Newton Stewart substation to Glenlee. According to the provisions of the 1989 Act, and the nationally recognised Electricity Network Standards, SPEN cannot easily permit this.

Before they can even begin to build any new power lines RES must satisfy the planning authorities with both the physical design and the route of the power lines. They must also satisfy the UK Electrical System Operator, the ESO, of the need for the development and they must state the economic case for it and justify the significant additional network integration investment that would be necessary as a consequence of it.

The current KTR project at Glenlee has been in consultation and planning since 2015 and, as mentioned above, has yet to gain planning permission. It can be assumed from this, that it is highly unlikely that the Blair Hill project can be physically connected into the national grid transmission network at Glenlee substation within the next ten or fifteen years

4) It is highly probable, owing to the now frequent requirement of the UK Electrical System Operator to constrain electricity production from wind farms north of the English border (the B6 boundary), that the transmission services required by RES for the Blairhill project are not physically capable of being delivered by SPEN at Glenlee, because SPEN as the local District System Operator is not permitted, under the terms of their licence agreement with the ESO , to enter into any contract which could result in the accepted operational capability limits of the national grid network being exceeded.

In other words, it is very likely, owing to too much electricity already being produced locally from wind turbines on windy days, that there is not enough spare capacity in the Scottish electricity transmission network for the power generated by the Blair Hill project to be safely fed into the national grid network at Glenlee

5) On the 19th March 2024, the ESO published "BEYOND 2030" the national blueprint for a decarbonised electricity system for Great Britain.

BEYOND 2030 is the Official UK Government Policy.

The introduction to BEYOND 2030 states, " Investment in renewable energy generation has exceeded investment in transmission capacity over the past decade, resulting in bottlenecks on the electricity network. Currently, energy is being wasted as the grid cannot transport it to where it can be used. Because of these bottlenecks, as the system operator, we sometimes have to ask wind farms to switch off to prevent the grid becoming overloaded – wasting cheap, sustainable, home- grown wind power"

Later on, describing the existing situation in Southern Scotland, BEYOND 2030 states, "As the level of energy ambition in Scotland scales up, existing challenges on the electricity network become more dominant. Currently, one of the most congested areas on Great Britain's electricity network is the area around the border between Scotland and England. This congestion is projected to get worse, and significant investment is required to ensure the system can be run in an economic and efficient manner. Without this investment, this one specific part of the network has the potential to cost consumers across Great Britain hundreds of millions of pounds per year.

This is because, in the absence of the investment recommended, renewable electricity generated in Scotland will not be able to be moved to where it can be used because of these capacity constraints. This means that renewable generators in Scotland will have to be paid to turn off, while additional gas and other non-renewable generation would have to be switched on across the south of the network in order to balance supply and demand - but the recommended investments would heavily reduce the requirement to do this. If network capacity in the region is not improved, the costs to consumers and the amount of renewable electricity generators we would need to pay not to generate will grow year on year.

We are looking to address this congestion in part by designing a network that provides significant additional capacity using offshore cables (which was recommended, in part, by our previous network planning recommendations), reducing, although not avoiding, the need for new infrastructure throughout the Central Belt and Borders. We are also recommending further upgrades to the existing onshore system and new infrastructure to further increase transmission capacity"

In other words the annual cost of paying wind farms in the south of Scotland not to produce electricity is accelerating in line with the number of new ones being built. Now that this fact has been officially recognised, it is difficult to imagine that the ESO are at all keen for SPEN to make it easy for RES to connect yet another wind farm into the national grid at Glenlee. Especially when BEYOND 2030 does not include any of the transmission bottlenecks that currently exist between Glenluce, Newton Stewart, Glenlee, New Cumnock and the B6 boundary in the long list of grid upgrades that have been prioritised by the ESO in their £58 billion, ten year investment plan for the national grid.

QUESTION 1

HAVE RES ACTUALLY RECEIVED ANY ASSURANCES FROM EITHER SPEN OR OFGEM THAT AN ACTUAL USEABLE AND DELIVERABLE GRID CONNECTION FOR THE BLAIR HILL PROJECT WILL BE OFFERED IF ONE IS REQUESTED ?

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NET ZERO MARKET REFORM

In the foreword to the November 2023 fourth phase report of the Net Zero Market Reform, NZMR, review carried out by the Electricity System Operator, the ESO , the Head of Market Development at the ESO, Cian McLeavey-Reville, says;

“The reality is that the current package of market design and policy is no longer fit for purpose, and if left unchanged will result in significant unnecessary costs and will risk GB missing its carbon targets. Evidence of this has continued to mount over 2022 and 2023; for example on 1st July 2023 we incurred a cost of £20.3 million when we had to bid 88 GWh of wind down. These are but a sign of what is yet to come – we believe these trends will only accelerate as the system continues to decarbonise, unless markets and policy undergo fundamental reform”

The report goes on to identify the various issues that have arisen as a result of shortcomings in the design of the current national electricity supply balancing mechanism system, the BM, shortcomings that are crying out to be dealt with urgently. The ESO sees the four key issues involved as;

1. Constraint costs are rising at a dramatic rate

2. Balancing the network is becoming more challenging and requires increasing levels of inefficient redispatch

3. National pricing can sometimes send perverse incentives to flexible assets, that worsen constraints

4. Current market design does not unlock the full potential of flexibility from supply and demand.

Further on in the report the BM, in its current form, is criticised for distorting the market by having created a situation where “ bidding is based on lost subsidies” and that there is, “a perverse incentive for generators to locate where congestion exists”

The conclusions from the Stage Four Report of the NZMR are:

“The ESO consider cost-reflective, granular temporal and locational signals are ultimately needed in the wholesale market to provide real-time transparency of system needs across supply and demand and to maximise flexible resources’ arbitrage revenues. As discussed in our Phase 3 report, we consider these signals would be most effectively deployed via shorter settlement periods and locational energy pricing.

Considerable investment will be needed in flexible resources to meet the changing system needs in all timescales driven by growth in weather-dependent renewables. Locationally and temporally accurate market signals are needed to incentivise flexible assets to locate and dispatch where they can minimise whole system costs”

In the earlier Phase 3 Report the conclusions reached were:

“Our analysis shows that the status quo will not deliver net zero cost effectively, as current market design creates inefficient behaviours, particularly in dispatch, resulting in dramatic and rising costs for consumers.”

“The most efficient solution to this is real-time dynamic locational signals, and our assessment of the three locational market design options finds that neither national nor zonal pricing can deliver these effectively.”

“ Our analysis shows that a nodal pricing market with central dispatch has the potential to deliver significant consumer benefits through facilitating efficient dispatch of generation, demand and flexible assets; and optimising siting decisions across the whole electricity system.”

“It creates the opportunity for consumers and industry to access low-cost, low-carbon electricity when and where it is abundant.”

“We think it is credible to implement nodal pricing and central dispatch within 5 years. There are some key questions that need to be answered, such as what are the additional market reforms required to complement nodal pricing, and to what extent should consumers be exposed to locational price signals.”

From these conclusions it can be safely assumed that:

The ESO is intent that new legislation will soon be introduced and that nodal pricing will replace national pricing sometime around 2030.

Clearly, if RES end up gaining planning permission for the Blair Hill project and then go on to build it, they will not be able to benefit from the current single nationally priced system of constraint payments that have allowed similarly, poorly located wind farms to prosper up until now. The " perverse incentive to locate where congestion exists" will have gone by the time Blair Hill is ready to be commissioned. The wind farm will have to operate under a new nodally priced market system where electricity generators are rewarded for being located where energy is needed and paid for providing energy at the time it is required as opposed to being paid compensation for not producing energy when it is not needed.

The node that will determine the price of electricity generated at Blair Hill will be in south west Scotland, home to the most congested part of the UK transmission network on windy days. As a consequence, regardless of the exact location of the node, once the nodal pricing system is introduced, the price that the market will be prepared to offer Blair Hill for wind generated electricity; or offer them to constrain generation, will be much less than it would be if the current single national pricing system were to remain in place.

If RES don't ditch the Blair Hill project they will be "locating where congestion exists", having made a " suboptimal siting decision" through failing to realise the financial implications that the imminent reform of UK energy markets will have for weather dependent generators on the wrong side of the transmission bottlenecks in South West Scotland.

QUESTION 2

ARE RES AWARE OF THE SCALE OF THE FINANCIAL IMPACT THAT " NET ZERO MARKET REFORM" WILL HAVE ON THE VIABILITY OF BLAIR HILL PROJECT ?

Blair Hill Wind Farm

Community Liaison Group

9th April 2024

RES has prepared this written response to questions received from members of the Community Liaison Group ahead of the meeting on 9th April 2024.

Grid

"Have RES actually received any assurances from either SPEN or OFGEM that an actual useable and deliverable grid connection for the Blair Hill Project will be offered if one is requested?"

As stated in the submission to RES, National Grid ESO (NGESO) and SP Transmission Limited (SPT) are obliged under the Electricity Act 1989 and also under their respective Electricity Transmission Licences to offer terms for connection. There are very exceptional hypothetical circumstances under which this obligation does not apply, however, in the 40 years in which RES has operated, RES has never encountered them nor is it aware of any other instance in which an electricity transmission licensee has refused to offer terms on grounds of useability or deliverability.

When investigating the feasibility of grid connection for any new renewables project, RES would always consult informally with the relevant grid company. Such informal discussions are always only indicative and without commitment from the relevant grid company. As such RES would never expect to receive "assurances" from SPT on the useability or deliverability of any grid connection solution. It is therefore worth reiterating that as RES haven't received an offer to connect to the grid network so the assertions made in the submission to RES are a matter of opinion. Ofgem would never comment on the feasibility of any individual grid connection as their responsibility is to regulate the energy market.

SPT will be responsible for obtaining the necessary consents and then construction of the grid connection for Blair Hill Wind Farm. They have a statutory duty to offer a grid connection if one if requested. The application for planning consent will be made by SPT under s37 of the Electricity Act 1989, which is a separate process to RES' application for the proposed wind farm. An Environmental Impact Assessment will likely be carried out for the proposed grid connection, however this is not carried out by RES.

The progress of the Kendoon to Tongland Reinforcement (KTR) project has no weight or bearing on the success or otherwise of any proposal to connect the Blair Hill project (should it be consented) to the grid network which will be considered on its own merits when an application is eventually made.

RES held discussions with SPT in the autumn of 2023 on the grid connection possibilities for Blair Hill and we will be revisiting these discussions later this month before submitting a Connection Application to SPT via NGESO. The resulting Connection Offer that we will receive will outline SPT's proposed connection solution for Blair Hill and it is only at this point that we will properly understand the detailed plans for grid connection of Blair Hill and how this will integrate with its wider strategic plans for upgrading of its transmission system necessary to achieve decarbonisation and Net Zero targets. Once we accept the connection offer, the point of integration into the transmission system and the delivery timescale will become public knowledge through the NGESO TEC register.

For the avoidance of doubt, the Glenlee Substation Extension has been consented. The KTR Project is awaiting a decision from Scottish Ministers following a Public Local Inquiry.

Net Zero Market Reform

"Are RES aware of the scale of the financial impact that Net Zero Market Reform will have on the viability of Blair Hill Project?"

RES welcomes the Net Zero Market Reform to support the delivery of the UK Government's aim of fully decarbonising electricity generation by 2035.

It is important to note that the Electricity System Operator (soon to be the National Energy System Operator, the body who was responsible for publishing comment on Nodal Marginal Pricing noted in the submission) is not responsible for deciding Government policy. The ESO themselves state in the Net Zero Market Reform: Phase 4 Assessment and Conclusions report[1]: "*the ESO will continue to support the Government and Ofgem on the design and implementation of reform options as they are narrowed down in REMA, specifically advising on their impact on GB electricity system operation*."

Furthermore, the assumption in the submission to RES that Nodal Marginal Pricing is set to be introduced is incorrect. Since the Net Zero Market Reform: Phase 4 Assessment and Conclusions report was published in November 2023, a second consultation under the Review of Electricity Market Arrangements (REMA) has been published by the Government in which it rules out moving to Nodal Marginal Pricing[2]. Several other options are being considered by the Government that will address operational issues while still ensuring deliverability of the Government 2035 decarbonisation target; Nodal Marginal Pricing is not one of them. Significant new investment in transmission infrastructure in order to integrate low cost renewables is required in all scenarios, and the Government understands this. RES fully understands the impact of Net Zero Market Reform on renewable generation and supports this change to market design for a net zero future.

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[1] https://www.nationalgrideso.com/document/294656/download
[2] https://www.gov.uk/government/consultations/review-of-electricity-market-arrangements-rema-second-consultation

Blair Hill Wind Farm

Community Liaison Group

9th April 2024

RES is preparing for the second public exhibitions to be held on 21st & 22nd May between 2pm and 8pm at the McMillan Hall in Newton Stewart and St Couans Hall in Kirkcowan. We propose the following topics and information will be presented on the public exhibition boards.

1. Welcome
    - Overview and purpose of the exhibition
2. About RES and RES in Scotland
3. The need for onshore wind
4. Project overview
    - Project background
    - Design evolution
    - Grid
5. Design layout and infrastructure
6. Constraints
7. Environmental considerations
    - Acoustics
    - Shadow flicker

- Ecology and ornithology
- Cultural heritage and archaeology
- Hydrology and private water supply
- Aviation lighting

8. Outline Biodiversity Enhancement Measures
9. Tourism and socio-economics
10. Landscape and Visual
    - ZTV
    - Updated photomontages
    - Comparative photomontages
11. Traffic and Transport
12. A Power for Good
    - Potential heritage and recreational trails
    - Community benefit and LEDS
    - Supply chain opportunities
13. Keeping the community informed
    - Ongoing consultation
    - CLG
14. Next Steps
    - Commenting on the updated proposal
    - PAC Report
    - Timeline
    - Further information

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1 Landscape and Visual

1.1 Introduction

Following the receipt of scoping responses from consultees in relation to the proposed Blair Hill Wind Farm, including additional comments received from D&G dated 2 February 2024, the proposed LVIA viewpoints set out in the scoping report have been reviewed and the following list prepared.

Updated ZTV studies based on an updated scheme layout have been used to review suggested viewpoint locations for use in the LVIA. Consideration has been given to D&Gs 2020 Supplementary Guidance 'Part 1 Wind Energy Development: Development Management Considerations Appendix 'C' D&G Wind Farm Landscape Capacity Study' and South Ayrshire's 2018 'Landscape Wind Capacity Study' which identify key viewpoints and landmark hills within the study area. Consideration has also been given to viewpoints identified within the recent Arecleoch Variation (ECU ref: ECU00001864) and South Kyle II (ECU ref: ECU00003429) applications, alongside the Artfield Forest application (ECU ref: ECU00003245), for potential cumulative effects.

It is proposed that the 26 locations set out below are included as viewpoints in the LVIA. The locations, which are illustrated on the revised ZTV, included with this document, represent visual receptors, character types and designative/sensitive landscapes at a range of distances and directions from the Site. These representative viewpoints will be used as 'samples' on which to base judgements of the scale of effects on visual receptors and represent a wide range of receptors – including not only those actually at the viewpoint, but also those nearby, at a similar distance and/or direction. It is anticipated that some viewpoints may be subject to localised micrositing when investigated on site, as well as alternative suggested locations being reviewed to ensure that worst case scenarios are selected. Where this is relevant comment is made within the table below.

Proposed LVIA Viewpoints

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
VP1: Drumwhirn Cairn, Moor of Barclye (239370, 568878)	2.6 km, south-west	Represents users of the RSPB moorland and users of NCR7 along to minor road to the south-west of the Site. Within RSA and LLA.	Photomontage
VP2: Corsbie Road, Newton Stewart (240445, 565633)	4.6 km, south west	Represents the experience of visitors and residents along the northern edge of Newton Stewart. On edge of RSA and LLA. Close to viewpoint requested by Cree Valley Community Council.	Photomontage Night-time photomontage
VP3: A75 south of Newton Stewart (241585, 564705 or 241875, 563640 or 242300, 560800)	5.3 km, south or 6.4 km, south or 9.4 km, south	Represents users of the A75, visitors and residents on the outskirts of Newton Stewart and users of NCR73 which passes below the A75. Within RSA and LLA. May be relocated to the cycle path adjacent to the A714 at the entrance to the Nether Barr Steading Self Catering Holiday Lodges, a location requested by Cree Valley Community Council, or further south near Causeway End as suggested by D&G, following further site investigation.	Photomontage
VP4: Glenvernoch Fell / Hill of Ochiltree (232711, 574115)	8.6 km, west	Represents recreational users of the Southern Upland Way around Glenverloch Fell.	Photomontage

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
VP5: NCR7 on Minor Road North of Glentrool Village (236118, 579390 or 237256, 578536)	8.2 km, north-west or 6.8 km, north-west	Represents visitors and residents of Glentrool Village, users of NCR7 and recreational users of Glentrool Forest. On edge of RSA and LLA. Within Galloway Forest Park boundary. May be relocated to the Glentrool Visitor Centre car park, a location requested by Cree Valley Community Council, following further site investigation.	Wireline
VP6: Cairnsmore of Fleet (250150, 567089)	8.6 km, east	Represents users of the recreational landscape to the east. Endorsed by Mountaineering Scotland. Within RSA and LLA.	Photomontage
VP7: Merrick (242748, 585514)	11.3 km, north	Represents recreational users of the landscape to the north, including the Dark Sky Park. Consideration has been given to views from the approach via Benyellary, but the view from Merrick represents the worse case scenario. Within RSA, LLA, Wild Land Area and Dark Sky Park Core Area. Within Galloway Forest Park boundary.	Photomontage

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
VP8: A75 near Creetown (247180, 558229 or 247196, 557737)	13.0 km, south or 13.5 km, south	Represents users of the A75 travelling towards the Proposed Development and visitors and residents on the outskirts of Creetown. Within RSA and LLA. May be relocated to the layby at Point Fishery as suggested by D&G and Cree Valley Community Council, following further site investigation.	Photomontage Night-time photomontage
VP9: Kirkcowan (233241, 560466 or 232752, 560954)	12.7 km, south-west	Represents visitors and residents of Kirkcowan and users of the neighbouring minor roads. Close to viewpoint requested by Cree Valley Community Council. Both viewpoints will be reviewed on site and the most appropriate location chosen for the assessment.	Photomontage Night-time photomontage

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
VP10: NCR73 on Minor Road North of Wigtown (243472, 556227) or Martyr's Monument (243054, 555420) or nr bird hide (244000, 554900) or Kirkland Hill/Lover's Walk (243300, 556000) or A714/B7005 Junction north of Wigtown (242711, 556790)	13.4 km, south or 14.7 km, south or 15.3 km, south or 14.1 km, south or 13.3 km, south	Represents visitors and residents on the outskirts of Wigtown and users of NCR73. Within RSA and LLA. A number of alternative locations have been suggested by D&G and Cree Valley Community Council. These will be reviewed on site and the most appropriate location chosen for the assessment.	Photomontage Night-time photomontage
VP11: Benniguinea Lookout (256655, 575970)	14.1 km, east	Represents users of the recreational landscape to the east. Within RSA, LLA and Dark Sky Park. Within Galloway Forest Park boundary.	Wireline
VP12: Mochrum Lochs LLA, Moor of Drumwall (230678, 554200 or 231917, 556693)	19.3 km, south-west or 16.5 km, south-west	Represents the LLA and users of the minor roads to the south-west around Gargrie Moor. Within RSA and LLA. An alternative location has been suggested by D&G on the core path to the north. This will be reviewed on site and the most appropriate location chosen for the assessment.	Wireline

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
VP13: Minor Road near Barhill Station (222659, 581336 or 232752, 560954)	20.5 km, north-west or 20.7 km, north-west	Represents visibility to the north-west from areas around Barhill. On edge of LLA. Close to viewpoint requested by Cree Valley Community Council. Both viewpoints will be reviewed on site and the most appropriate location chosen for the assessment.	Wireline
VP14: Southern Upland Way near Artfield Fell (221186, 568010)	20.6 km, west	Represents recreational users of the Southern Upland Way to the west.	Wireline
VP15: A76 North of Whithorn (244468, 541031)	29.1 km, south	Represents users of the A76 and residents and visitors to Whithorn, south of the Site.	Wireline
VP16: Byne Hill (217864, 594554)	31.9 km, north-west	Represents users of the recreational landscapes to the north-west near Girvan. Within LLA.	Wireline
VP17: A712 east of Corsock (278887, 573612)	36.2 km, east	Represents users of the A712 to the east.	Wireline
VP18: Southern Upland Way near Stranraer (205814, 558888)	37.5 km, south-west	Represents recreational users of the Southern Upland Way, recreational landscapes and minor roads near Stranraer.	Wireline

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
VP19: Sandhead (209777, 549724)	37.8 km, south-west	Represents residents and visitors of Sandhead, users of the beach and other recreational landscapes.	Wireline
New viewpoint VP20: Monigaff Parish Church (241016, 566654)	3.4km, south west	Represents the experience of visitors and residents along the northern edge of Minnigaff. Within RSA and LLA. Requested by Cree Valley Community Council.	Photomontage
New viewpoint VP21: Lamachan Hill (243451, 576873)	2.8km, north east	Represents users of the recreational landscape to the north east. Located slightly off the summit in area of greater visibility. Within RSA, LLA and Dark Sky Park Core Area. Within Galloway Forest Park boundary. Proposed by Mountaineering Scotland.	Wireframe only (no photography)
New viewpoint VP22: Millfore (247803, 575448)	5.4km, north east	Represents users of the recreational landscape to the north east. Within RSA, LLA and Dark Sky Park Core Area. Within Galloway Forest Park boundary. Proposed by Mountaineering Scotland.	Wireframe only (no photography)

Viewpoint	Distance and direction from closest proposed turbine	View / receptors represented	Type of visualisation to be prepared
New viewpoint VP23: Meikle Millyea (251536, 582539)	12.3km, north east	Represents users of the recreational landscape to the north east. Located slightly off the summit in area of greater visibility. Within RSA, LLA and Dark Sky Park. Within Galloway Forest Park boundary. Replacement for viewpoint proposed by Mountaineering Scotland at Corserine as revised layout has resulted in almost no visibility from Corserine.	Wireframe only (no photography)
New viewpoint VP24: Innerwell Fishery approach (247607, 549209)	21.7km, south	Represents users of core path and minor roads north of Garliston. Within RSA and LLA. Requested by D&G.	Wireline
New viewpoint VP25: Penninghame Estate pond, Castle Stewart (237400, 569300)	4.3km, west	Represents visitors to recreational space to the east and local design landscape. Requested by D&G.	Photomontage
New viewpoint VP26: Knockman Woods (241301, 568161)	1.9km, south	Represents visitors to recreational space to the south. Within RSA and LLA. Requested by D&G.	Photomontage

1.1.1 Visualisations

Visualisations will be prepared in accordance with NatureScot's 'Visualisation of Wind Farms Best Practice'. Wirelines and photomontage visualisations will be used to aid the assessment. These will be generated from a 3-dimensional (3D) model of the proposed wind turbines, site and surrounding topography, using key landmarks and compass bearings to match the modelled views to the photographs.

Photographs, wirelines and photomontages will be shown on figures supporting the LVIA. It is anticipated that a baseline panorama and wireline (including cumulative schemes) and a wireline of the Proposed Development will be provided for all suggested viewpoints, unless indicated otherwise above. Photomontages will be prepared for all viewpoints within 5 km of the Proposed Development, and a selection of the more distant viewpoints. Night-time photomontages will be prepared to support the night-time assessment, utilising a selection of the daytime viewpoints as indicated above.