Blair Hill Wind Farm

Report on Feedback

May 2024

Introduction

Purpose of this report

RES has considerable experience in developing onshore wind projects throughout the UK and believes in the importance of community consultation to identify issues and concerns, as well as benefits and opportunities, which can be considered when developing and designing a project.

The purpose of this report is to summarize the written feedback received from the community during the October 2023 public exhibitions and subsequent consultation period. It also highlights any changes that have been made to the preliminary design of the proposed development since then.

Each section focuses on a key topic area and summarises the key themes within the feedback, followed by RES' response.

October 2023 Consultation

RES held two public exhibition events in the local area (Newton Stewart and Wigtown) in October 2023, as part of its pre-application consultation on the proposed Blair Hill Wind Farm. These events provided people with the opportunity to learn more about the project, discuss the proposals with the project team, and provide written feedback to RES on the preliminary design.

3 October 2023	4 October 2023
Newton Stewart, McMillan Hall	Wigtown, Wigtown Country Buildings

A range of information was made available, with RES staff on hand to discuss the proposal and answer any questions. A two-week consultation period followed the exhibitions, for people to submit written feedback to RES on the proposal and preliminary design.

General Overview

More than 400 people attended the first consultation events and over 190 comments forms were received by the time that the consultation period closed – providing almost 2850 comments across a variety of topics.

191	2,850	400+
Individual Responses	**Individual Comments**	**Consultation Attendees**

Strong interest in the proposals was observed among the local community, many of whom reside in the Dumfries and Galloway local authority area. The map below highlights the local areas the survey respondents are from, where an address was provided. The numbers in circles

indicate the number of respondents from that area, while the orange and green pins represent one individual respondent.

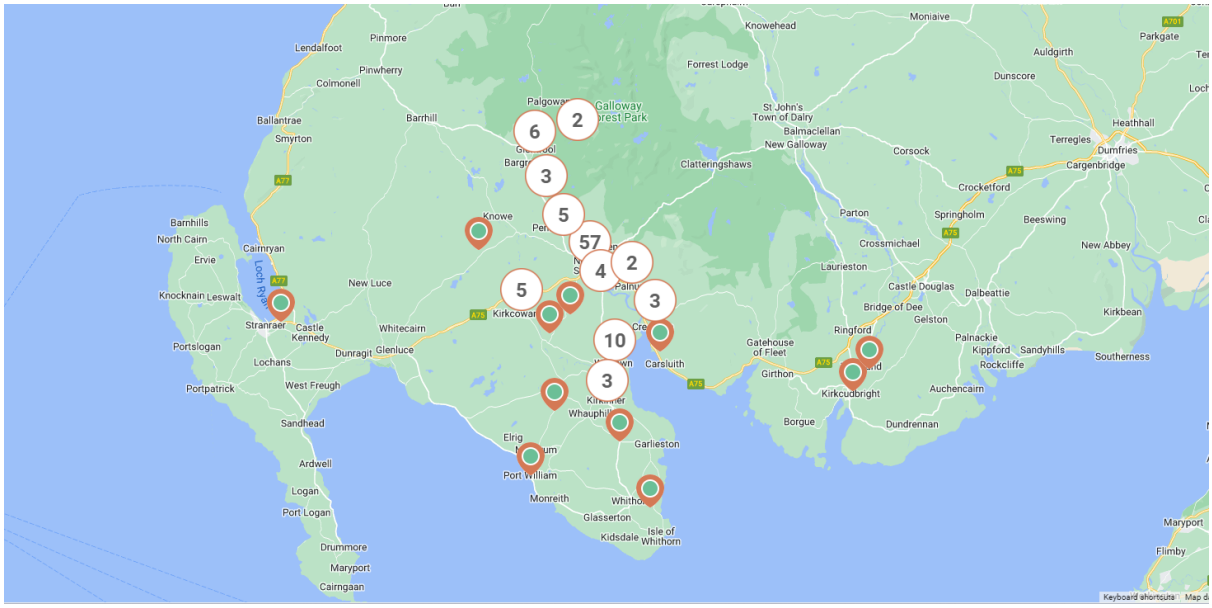


Figure 1 Geographical Spread of local consultation survey responses

69.8% of respondents outlined that they increased their understanding about the proposals following their attendance at our exhibitions, indicating that the events served as conducive opportunities for information sharing and feedback gathering.

1.3 Having visited the exhibition to what extent do you feel you have increased your knowledge about the proposed Blair Hill Wind Farm

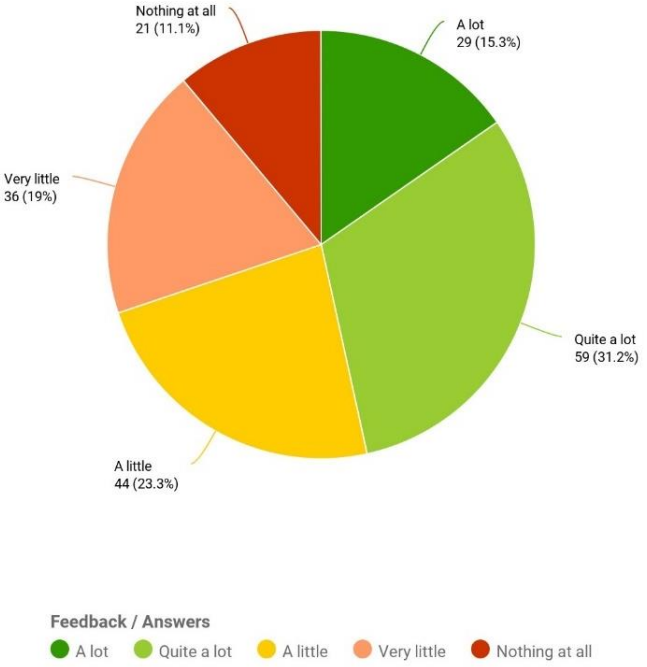


Figure 2 Analysis of responses to feedback form question 1.3

Some respondents (approximately 57%) offered feedback on the exhibition events, for example: exhibition format; exhibition staff; exhibition materials; and range of general comments (positive, negative, and neutral) on the exhibition events.

RES also included a multiple-choice question on the comments form that asked how the respondent felt about the preliminary plans for the wind farm. The breakdown of responses is as follows: 3% responded that they were supportive of the plans; 5% responded that they were neutral to the plans; 81% responded that they were opposed; 6% responded that they didn't like onshore wind farms in general; and 5% didn't answer.

The consultation feedback submitted to RES has been considered by the project team as part of the design development, in addition to feedback from key consultees and the findings from the detailed technical and environmental studies that have been undertaken. We are grateful to everyone who took the time to engage with us during our first round of consultation.

Topical breakdown of comments

The graph below shows the balance of topical comments received, with the following most salient:

- Landscape and Visual Impact (turbine height, site location)
- Tourism (impact on local tourism industry)
- Ecology (wildlife and species, habitat)
- Heritage Assets (proximity to assets)
- Biodiversity (variety of species and wildlife)
- Aviation Lighting
- Noise

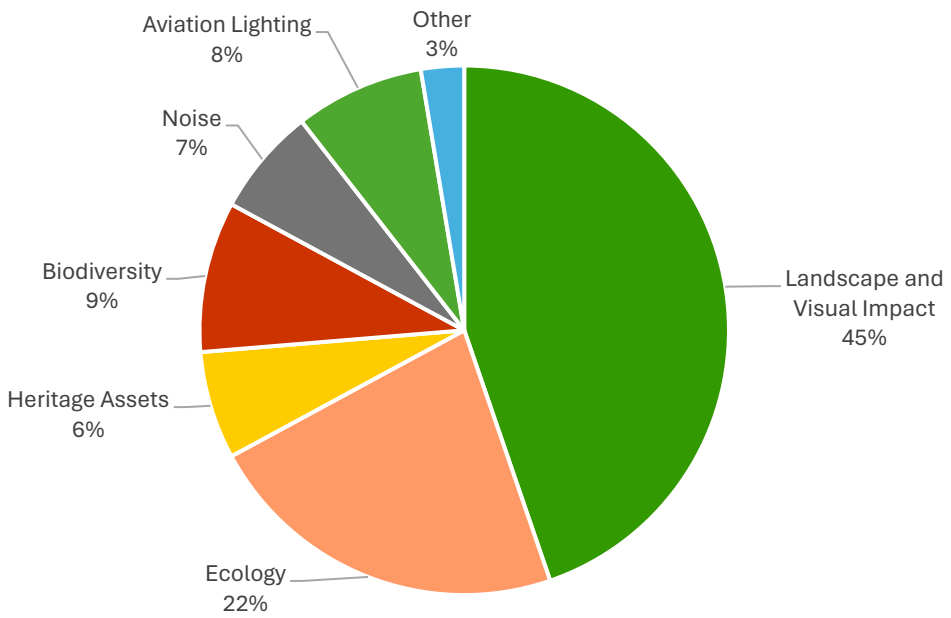


Figure 3: Summary of themes raised within consultation feedback.

Theme 1: Landscape and Visual Impact

Key themes

Approximately 34% of all the topical feedback received focused on the landscape and visual aspect of the proposal. The key themes and comments raised within the feedback were:

- Site location: Blair Hill was not a suitable location for a wind farm due to its close proximity to Newton Stewart.
- Turbine Height: turbines too big; turbines tallest in Scotland and the UK and turbines too big for the site; turbines would be visible from far away; and smaller turbines would be better.
- Turbine numbers: visual impact from too many turbines.
- Cumulative impact: already enough wind farms in Dumfries and Galloway
- Exhibition visualisations: visualisations were misleading, and visualisations were not to scale and more visualisations should have been included.

RES response to landscape and visual feedback

RES recognises that the landscape and visual aspect of the proposal was a key concern within the community and has sought to incorporate this feedback in the latest design.

Since the public exhibitions in October 2023, we have removed seven turbines from the layout design, reduced the tip height of 2 turbines to 210m (with the other turbines at a tip height of 250m) and revised the remaining turbine locations. One of the key drivers for this change, alongside minimising effects on heritage assets and sensitive habitats, was to reduce visibility from key viewpoints. This includes visibility from the Merrick being reduced to only three blade tips and reducing the overall spread of the wind farm from viewpoints like VP 2 - Corsbie Road and VP 10 – NCR73 North of Wigtown. Additionally, these revisions have aimed to minimise the visibility of any necessary aviation lighting from within the Dark Sky Park.

Our landscape architects have undertaken extensive assessment work to inform the design development and turbine layout. Each turbine location has moved to varying degrees to refine the design and minimise impacts wherever possible. We are looking to achieve a design that strikes an acceptable balance between the visibility of the proposal and its ability to generate significant amounts of renewable energy. Ultimately, the acceptability of this design will be assessed by the determining authority in relation to current energy policy and planning requirements having considered feedback from consultees as well as representations by members of the community and wider public.

Wind farms are quite often sited on hills or areas of higher ground in Scotland as the wind regime tends to be better in these locations – with smoother and less interrupted wind. Such positioning, however, does tend to create more visible sites and so the turbine height needs to be assessed accordingly from a landscape and visual perspective to understand if the proposal may be appropriate from a planning perspective.

For the exhibitions last October, we produced a small number of visualisations from representative viewpoints. These are produced to stringent NatureScot guidelines depicting the turbines, based on the preliminary design, at 250m tall. Any claims that visualisations were not to scale or depicted smaller turbines are incorrect.

As a result of feedback requesting viewpoints from further locations, we have produced a 3D model video which is available to view at the exhibition.

Theme 2: Tourism

Key themes

Approximately 24% of respondents referenced the impact that the proposed wind farm would have on the local area's tourism industry. The key themes and comments raised within the feedback were:

- Impact on tourism industry: Tourism is an integral part of Newton Stewarts economy; will drive visitors away; and impact on local businesses.

RES response to tourism feedback

All research to date indicates that onshore wind development has had no adverse impact on the tourism industry in Scotland. However, an assessment will be included within the application with specific regard as to whether the Blair Hill project will have any effect on tourism behaviour and the tourism economy.

The assessment will consider the potential effects that the development could have on tourism following a focused approach on effects related to the UNESCO Biosphere and key tourist attractions and recreation assets.

The BiGGAR Economics report: Wind Farms and Tourism Trends in Scotland (2021), found that while the capacity of wind farms had more than quadrupled over the study period, employment in tourism related sectors had increased by more than 20%.[1] It found no relationship between tourism employment and wind farm development, at the level of the Scottish economy, across local authorities nor in the locality of wind farm sites.

Theme 3: Ecology

Key themes

Approximately 17% respondents focused on ecology in their feedback. The key themes and comments raised within the feedback were:

- Wildlife: Concerns about potential impact on wildlife and specific species.
- General comments: general concerns about impact on environment and hill land; concerns that survey work was inadequate.
- Habitat: Concerns about impact on habitat.

RES response to ecology feedback

Protecting and minimising any potential direct or indirect impacts on local wildlife and their habitats is of utmost importance and we take this responsibility seriously. We look to mitigate any potential effects of the development during construction and operation on the habitats and protected species that are found to be present or active within the site.

[1]BiGGAR Economics. 2021. "Wind Farms & Tourism Trends in Scotland: Evidence from 44 Wind Farms." BiGGAR Economics. https://www.biggareconomics.co.uk/onshore-wind-and-tourism-in-scotland.

Extensive ecological surveys have been completed across the site for habitats, protected species and fish. The survey findings show that the habitats are a mix of areas of commercial conifer plantation and a mosaic of common upland vegetation types which are grazed by livestock, including areas of acid and marshy grasslands, bracken, wet heath, and bog.

The protected species surveys indicate the presence of otter, badger, bats, reptiles and potentially pine marten at, or in close proximity to, the site. The fisheries surveys indicated many of the suitable watercourses on and around the site contained brown trout, with one watercourse downstream having low numbers of Atlantic salmon. The design of the wind farm has included avoidance and buffering from key features. Full survey details and results will be presented in the Environmental Impact Assessment (EIA) Report.

Extensive ornithological surveys have also been undertaken across the site. These comprised of targeted flight activity surveys and a range of distribution and abundance surveys for breeding waders, raptors and owls, black grouse and wintering birds. The survey findings showed limited presence of breeding waders with only snipe recorded breeding in relatively low numbers. Barn owl were identified to be nesting at one location within the site and potentially nesting at a second. Black grouse were also identified to be lekking at two locations within the survey area with one to two males present at each lek location.

The design of the wind farm has included appropriate buffers on known breeding sites for barn owl and lek sites for black grouse. Full survey details will be presented in the EIA Report.

Theme 4: Heritage Assets

Key themes

Approximately 5% of respondents referenced the impact that the development would have on protected historical monuments. The key themes and comments raised within the feedback were:

- Proximity to historic assets: Turbines should not be located adjacent to historic monuments (e.g. Garlies Castle)

RES response to heritage assets feedback

Within, or directly adjacent to, the site there are six Scheduled Monuments: Dalvaird Cairn (SM1015), Drumfern Cairn and Stone Circle (SM1019), Napper's Cottage Cairn (SM5676), The Thieves, Standing Stone (SM1044), Cordorcan Cairn (SM10385) and Garlies Castle (SM7916). Feedback from Historic Environment Scotland (HES) and Dumfries and Galloway Council, as well as comments from the exhibitions, have significantly influenced the updated design. The design has been revised to include a larger set back distance from Scheduled Monuments to reduce any adverse impacts on setting and reduce the negative impact overall of the development on the historic environment. Amongst other changes, the two turbines closest to Garlies Castle has been removed, as well as the three turbines closest to Dalvaird cairn.

The associated infrastructure for the proposal has been designed such that there would be no direct physical impacts on the scheduled monuments.

In addition to these design considerations, RES is actively exploring enhancement proposals to improve public accessibility to the heritage assets within the site. This could be achieved through a network of new and upgraded footpaths, forming a signposted heritage trail throughout the site. We believe that this initiative will unlock the site's heritage, promoting awareness and a better understanding of the historic environment for both the local community and visitors alike.

Theme 5: Biodiversity

Key Themes

Approximately 5% of respondents referenced the impact that the development would have on the local area's biodiversity. The key themes and comments raised within the feedback were:

- Construction phase: Impact on biodiversity during construction (i.e. heavy goods vehicles).
- Site and neighbouring area: Impact on the site and neighbouring areas
- Knowledge of biodiversity: Lack of knowledge shared with the community regarding the impact on biodiversity.

RES response to biodiversity feedback

As part of the project design, we are developing a Biodiversity Enhancement Plan which will focus on improving the biodiversity already found on the site beyond offsetting any potential loss of biodiversity from the development. Although any enhancement measures proposed will look to offset potential impacts of the project, primarily they will seek to complement the existing conditions for flora and fauna while expanding their effective reach as much as is practicable.

Some of the measures we are proposing are included in the exhibition boards and we would welcome feedback on our proposals.

For example, we have identified areas on the site that may be suitable for peatland restoration. This work will aim to improve the quality of peatland habitats on site, including reducing areas of exposed peat which release carbon if left untreated.

Theme 6: Noise

Key Themes

Approximately 5% of respondents referenced the noise that would be generated by the wind farm. The key themes and comments raised within the feedback were:

- Noise from turbines: Concerns around the noise generated from turbines of this size; how far away can the turbines still be heard.

RES response to noise feedback

The acoustic profile of the turbines is one of many important considerations that has been assessed and carefully managed as part of the site design. The design process will ensure that

the project doesn't exceed the strict acoustic limits which will be set within the planning conditions should consent be granted. These limits correspond to existing background acoustic levels typical in the local area, which will control the wind farm acoustics in relation to nearby residential properties.

Operation and construction acoustic assessments and prediction are undertaken in accordance with the relevant standards, current assessment methodologies and best practice as determined by the regulatory bodies, which include Dumfries and Galloway Council, the Scottish Government and the UK Institute of Acoustics.

In consultation with Dumfries and Galloway Council, we have undertaken a background sound survey at a number of locations around the site to measure the existing background sound levels. The results of the background sound survey are being analysed by our acoustics team and will inform the setting of the sound emission limits for the operation of the wind farm. These limits will be agreed with the regulatory authority, and the site will be required to comply with these strict noise limits set within planning conditions.

The acoustic impact of the wind farm will be modelled, and the output of this modelled work will be presented in the acoustic chapter of the extensive EIA Report which will accompany the planning application.

Theme 7: Aviation Lighting

Key themes

Approximately 6% of respondents referenced the aviation lighting as a key issue related to the wind farm proposals. The key themes and comments raised within the feedback were:

- Dark sky: Aviation lightings impact on dark skies.
- Areas designation as a "dark sky park".

RES response to aviation feedback

RES appreciate concerns raised about the impacts of aviation lighting on the Dark Sky Park. We are seeking to agree a lighting strategy with the Civil Aviation Authority that reduces the need for all turbines to be lit. Technologies are being developed that include the ability to turn on the lights only when aircraft are approaching the wind farm, and RES is committed to using new technology as it becomes available to reduce impacts further.

Revisions to the layout design have sought to reduce potential visibility of any required aviation lighting from within the Dark Sky Park.

The red aviation lighting currently used is designed to focus the light across and upwards for the attention of aircraft rather than downward to those at ground level. The light intensity varies in response to weather conditions and visibility – with lighting dimmed to 10% of their intensity in good visibility but maximised in cloudy or foggy weather. In some instances, infra-red lighting may be possible which is invisible to the naked eye. The proposed lighting strategy will be presented in the planning application, which will also include a night-time visual impact assessment, visualisations and Zone of Theoretical Visibility showing the extents of visibility of the agreed aviation lighting scheme.

Topical and General Project Feedback

Key Themes

Approximately 2% of the remaining feedback focused on the following topics: Flooding and Private Water Supply, Transport (during construction), Grid Connection and Socioeconomics (community benefit).

RES response to general feedback:

Flooding and Private Water Supply:

Whilst a detailed flood risk assessment has been scoped out the EIA Report, and this has been agreed to by SEPA, we will consider the increased flood risk to areas downstream of the site through increased surface run off and measures to control the rate and quality of runoff will be specified in the EIA Report.

A Sustainable Drainage System (SuDS) will be implemented to provide surface water management and included as part of the wider Pollution Prevention Plan. This will be submitted to SEPA as part of the application for a Complex License under The Water Environment (Controlled Activities) (Scotland) Regulations 2011(CAR).

Water quality monitoring will be undertaken on discharge waters during the construction phase to ensure that the proposed development does not impact on local watercourses and rivers. With mitigation measures in place, significant impacts associated with flood risk and surface water are not anticipated.

We are very aware of the potential effects on water quality that could arise from construction works and make every effort to remove risk through the design process in the first instance. A private water supply assessment is being carried out for inclusion in the EIA Report.

In the event that the project receives consent, we must operate under the Water Environment (Controlled Activities) (Scotland) Regulations 2011, more commonly known as the Controlled Activity Regulations (CAR)[2] which apply regulatory controls over activities which may affect the water environment, including PWS. In accordance with these Regulations, appropriate physical measures/additional protection would be put in place during construction to minimise the risk to the surrounding area's water quality. In the unlikely event that the project was found to have adversely impacted upon the quality of the private water supply, it is the wind farm owner's legal responsibility to correct that situation.

Transport (during construction):

RES has commissioned surveys to understand traffic flows and volumes on local roads and assess any potential impacts of construction traffic on the local area. This has enabled RES to identify potential pinch points, bottlenecks, areas which will require road improvements, and areas which may require traffic management and will help in developing mitigation strategies.

[2] https://www.sepa.org.uk/regulations/water/

The data collected from the traffic surveys will be presented in the Traffic and Transport chapter of the extensive EIA Report that will accompany the planning application.

Grid Connection:

RES is awaiting a grid offer from the grid Transmission Owner (TO), in this case Scottish Power Transmission via National Grid ESO (NGESO). We expect the project to be connected into a substation at Glenlee, approximately 20km from the site, although this will be confirmed by the TO in the coming months.

To enable Blair Hill Wind Farm to connect to the National Grid, the expected infrastructure will comprise one 132kV overhead wood pole line. The grid route application for this connection will be submitted by the TO, however indicative details of the anticipated route of the grid connection for the project will also be in included in the Project Description chapter of the EIA Report which will accompany the planning application. RES envisages this would follow existing grid routes where possible.

Socioeconomics:

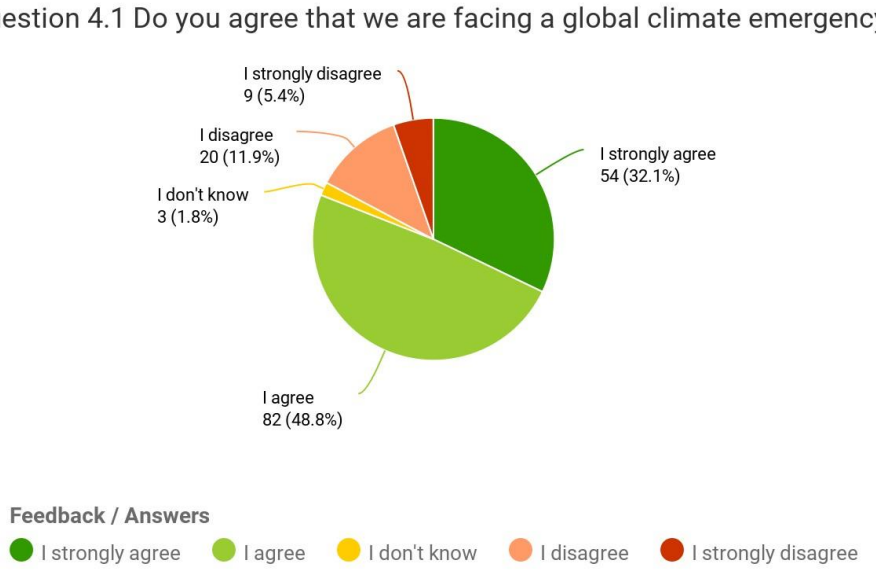
If approved, the Blair Hill Wind Farm will provide a custom-tailored community benefits package worth £5,000 per megawatt (or equivalent) of installed capacity per year, designed to align with the local community's priorities. We extend our appreciation to the local community members and groups who have shared feedback and ideas for local benefits and priority projects they would like to see supported or implemented if the wind farm receives approval.

Climate change, energy security and renewables

RES also included an additional optional section on the feedback form to help understand people's thoughts on how renewables can help to tackle climate change and improve energy security.

On this topic, 90.9% of all respondents agreed that we are facing a global emergency, with 80.8% agreeing that generating electricity from a renewable source can help tackling climate issues.

Respondents did however raise concerns over the appropriateness of onshore wind as part of this renewable energy mix, with 76.5% disagreeing that these developments should be developed to support greater energy independence and security for Scotland.



RES response to climate feedback

RES believes it is important to acknowledge that addressing climate change requires a multifaceted approach, and different solutions may be appropriate for different contexts. However, we firmly believe that onshore wind farms play a vital role in our transition to a sustainable future for several reasons. Onshore wind farms provide a reliable source of clean electricity, helping to reduce our reliance on fossil fuels and lower greenhouse gas emissions.

As Scotland aims to reach Net Zero by 2045, demand for electricity, is expected to increase significantly. To ensure that Scotland is able to meet this heightened demand using clean, renewable energy, the Scottish Government has set ambitious targets to more than double the nation's onshore wind generating capacity from 9.6GW (current installed capacity) to 20GW by 2030. As onshore wind farms are the lowest cost way to generate renewable electricity, developments such as the proposed Blair Hill Wind Farm will play a key role in Scotland's transition to a net zero society. In addition to the environmental benefits, the onshore wind industry supports a supply chain across the country which employs close to 9,000 people and brings benefits to Scotland in the form of investment and skill development.