OBJECTION

from the

Cree Valley Community Council

to the planning application

for the proposed

Glenvernoch Windfarm

ECU Ref. ECU00004892

Applicant: EnergieKontor Ltd

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Background

Cree Valley Community Council, CVCC, represents the 4200 people who live in Newton Stewart, Minnigaff, Glentrool and the surrounding areas. The Glenvernoch Wind Farm Application (GWFA) site lies wholly within the CVCC area. The local council ward is Mid Galloway and Wigtown West (MGWW) of which the CVCC area contributes around a third of both the population and the land area. It is a single post code area a quarter of the size of Cumbria, yet it currently produces four times as much electricity from wind annually as Cumbria. Our community which enjoys a similar geography to Cumbria is currently producing 16 times more electricity from wind per square kilometre when compared with Cumbria. There are already 157 large wind turbines in MGWW with an installed capacity of 352 MW and a further 54 very large turbines with a total capacity of 248 MW are consented and likely to be commissioned by 2030. When the potential for repowering existing wind farms is factored in, we can justifiably claim that our community is already doing its fair share to help Scotland achieve its 2030 renewables targets. Nevertheless, CVCC accepts that dealing with the Climate Emergency involves producing even more renewable electricity. Consequently, we are NOT opposed to new wind farms being built in our area provided they are built in the right place as prescribed in NPF4.

Until 16th December 2024, during the seventeen months following the GWFA announcing itself, the CVCC kept a neutral stance on the project believing that both supporters and objectors deserved to be given the chance to state their case before a final decision on the official CVCC response to the GWFA was made. This was an incredibly difficult stance to maintain because the simultaneous initial news of the plans for the Glenvernoch and Blair Hill Wind Farms on opposite sides of the Cree, close to Newton Stewart, caused immediate uproar in the community. Despite this CVCC kept themselves open to the possibility that support for either of the two wind farms would emerge. None did. The exit polls at the public exhibitions for both projects consistently showed that the community can properly be described as unanimous in its opposition to both wind farms with a consistent 95% of the hundreds who participated in the separate polls registering their opposition to the respective wind farm in question. CVCC has also received over 450 emails and letters from local people concerned by the Glenvernoch and Blair Hill plans. Many of them lengthy and considered. Again, over 95% of them were from opponents of the two wind farms.

We held a public meeting on the 16th of December 2024 to consult the community before we finally decided what our response to the GWFA would be. It was no surprise that 95% of those who attended the meeting wanted us to object. We decided at a full meeting of CVCC on 6th January 2025 that we would object to the GWFA.

Fundamentally, local opposition to the GWFA is rooted in the realisation that the scenic beauty of the Cree Valley stands to be sacrificed and MGWW will quickly become nothing

more than one giant wind farm if the GWFA receives planning permission and is built. The feeling is that if the GWFA is allowed then it sets a precedent for more wind turbines to be built in and around the Galloway Hills diminishing the natural beauty of the local environment. Newton Stewart will cease being the Gateway to the Galloway Hills and become the Gateway to the Galloway Wind Farm.

It is worth mentioning that there was a large mental health aspect to some of the emails received by CVCC. The fear that it would be impossible to go anywhere in the area and escape the sight and sound of wind turbines. GWFA Figure 6.22 Hub Height ZTV up to 20km shows that all 13 turbines are theoretically visible in virtually all open views from within the Cree Valley. Figure 6.22 is a graphic illustration that this fear is real and justified. The vulnerable in our community need natural places to go to and occasionally escape the relentless grinding stresses that the modern world brings them. Consenting a wind farm in a landscape where it will overwhelm and impact on the mental wellbeing of the people who use that landscape is not good public policy. The ZTV in Figure 6.22 shows that the Glenvernoch wind farm will indeed overwhelm.

Wind Farm Development in MGWW first began with Artfield Fell in 2003. The wind turbines built there have since been dwarfed and swallowed into the mass of large and very large typology wind turbines that have been rising up around it ever since. The 96 large turbines of the Kilgallioch wind farm that lie next to Artfield Fell now sit at the centre of an expanding cluster of windfarms that straddles the local authority boundary between Dumfries and Galloway and South Ayrshire. There are already over three hundred large wind turbines in this cluster which has grown to cover a large area of the patchwork of commercial conifer plantations which grew to blanket what was formerly open moorland. CVCC raised no objections to these wind farms. The landscape was already depopulated and had already been ruined by afforestation and as a result was not particularly valued. We would suggest that if further wind energy development is required then it would be more appropriately sited in the conifer plantations close to the existing Kilgallioch wind farm cluster where it would be relatively inconspicuous and far enough away not to impact on the lives and businesses of local people. We can accept turbines 15km to the north and west but not as is the case with the GWFA, a kilometre from the River Cree where it will significantly impose upon the visual amenity of local residents and visitors to the area.

1. Planning Regulations

1. Local Development Plan
2. Electricity Act 1989
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4. The Galloway National Park
5. The Negative Impacts of the GWFA

1.1. Dumfries and Galloway Local Development Plan

We consider that the GWFA to be in breach of policies and guidance set out in the Dumfries and Galloway Local Development Plan, LDP2 (2019).

GWFA Figure 6.10, shows Glenvernoch as an outlier from the established Kilgallioch wind farm cluster. Glenvernoch sits 8km to the east of the leading edge of the Kilgallioch cluster. It is under a kilometer from the River Cree and the following important natural areas; the Regional Scenic Area, the Galloway Forest Park, the Dark Sky Area, the SSSI Wood of Cree, the RSPB Wood of Cree nature reserve; and it lies within 10 km of the Merrick Wild Land Area. The internationally important Galloway and Southern Ayrshire UNESCO Biosphere has Glenvernoch at its centre.

The GWFA ignores the recognised sensitivities of the habitats and landscapes mentioned above, preferring instead to misinterpret the 2017 DWLCS (Dumfries and Galloway Wind Landscape Capacity Study) and assume that since the GWF lies within category 17a, Plateau Moorland with Forest, that in the eyes of the local Council it is in *"one of only a small number of areas within Dumfries and Galloway that has scope for additional large turbine development"*.

CVCC contend that the categorisation of areas of land into separate landscape character types does not render the process analogous to the compartmentalising of items placed in separate drawers of a chest as the GWFA seems to suggest. An item in one of the drawers that fit together to make up a complete chest of drawers can be viewed as independent from what is in the next drawer. We consider it absurd to suggest that a development proposal sited in a landscape categorised as being of a particular character type can similarly be viewed as being independent from the landscape character types that have been assessed as occurring next to it.

A development must be considered in the context in which it will be seen; in a relationship with the landscape all around. The assumption that *"Glenvernoch is one of only a small number of areas within Dumfries and Galloway that has scope for additional large turbine development''* is

erroneous. The recognised natural characteristics of the surrounding landscape informs that there is no scope for large turbine development here.

DUMGAL Council are in the midst of updating their Wind Energy Supplementary Guidance. The process is at an advanced stage. The draft, Dumfries and Galloway Wind Energy Landscape Sensitivity Study Assessment of Larger Wind Turbines, was published in October 2024. Although it is in draft form and yet to be adopted it has to be considered more relevant today than the, now dated, 2017 guidance. The DGWLSS 2024 states:

"There is merit in consolidating the association of more successfully sited operational wind farm developments with extensive, sparsely settled landscapes with a predominantly simple landform and land cover by directing new wind farm developments to similar landscapes. Directing larger typologies to more extensive upland landscapes set back from more sensitive lowland areas would also reduce the potential for cumulative landscape and visual impacts to occur between different scales and designs of turbines, in more settled areas where any future demand for farm-based turbines is likely to be greatest.

It is recommended that this clear pattern of wind farm development should not be weakened by locating larger wind turbines in more complex, smaller scale and/or settled landscapes as this will increase landscape and visual impacts but also dilute a clear strategy and association of a particular wind turbine type with a particular landscape character."

The draft update to the current guidance then goes on to make the following recommendations:

"3.6 A recommended landscape strategy

• Protection of the most scenic of Dumfries and Galloway's landscapes by directing larger wind turbines away from designated landscapes and avoiding significant intrusion on Inventory and non-Inventory designed landscapes.

• Maintaining the sense of wildness associated with the Galloway Hills as a core aspect of the identity of Dumfries and Galloway (and a special quality of the Galloway Hills RSA) by directing wind farm development away from these uplands and avoiding developments that could impact on the wider landscape setting and appreciation of these uplands in views from surrounding landscapes. Cumulative landscape and visual effects of wind farm development in surrounding landscapes will need to be carefully considered in terms of potential effects on the sense of wildness associated with these uplands. With wind farm development now occupying extensive tracts of the uplands of Dumfries and Galloway, it is important to protect remaining more complex and open upland landscapes and their setting/special qualities.

• Promote a clear pattern of larger wind farm development associated with less sensitive upland landscapes where their more extensive scale and simpler landform and landcover can better accommodate and provide an appropriate wider setting to large developments, minimising impacts on

less sensitive landscapes, and consolidating a strategy whereby a particular wind farm type is associated with a particular landscape character.

• Direct larger turbines away from lowland areas as these are striking in the rich variety of landscapes, often with many layers of archaeological and historical interest, small-scale topography, complex landforms and intricate patterns of settlement and land use. Smaller turbines would form more of an incidental feature in these sensitive landscapes while larger turbines would dominate and detract from their character and on views from these often well- settled areas.

And specific to the GWFA. In reference to the wind turbine capacity of the Glenvernoch landscape, categorised as Assessment Unit 17: All development typologies should avoid impacting on the setting and views to small lochs, on areas of more complex landform, including small but pronounced hills such as Glenvernoch Fell, and on archaeological features as these enrich this landscape and often provide a focus in views. Intrusion on key views to the Galloway Hills, for example from the A714 and the Cree valley, should be avoided. Sensitivity is increased in the eastern parts of this Assessment Unit due to their proximity to the Galloway Hills RSA and the Merrick and Glentrool area which is important for recreation. Larger wind turbines would be likely to have an increased impact on these adjacent landscapes and could also extend the duration of effects on the sense of wildness associated with the Galloway Hills (and the associated Dark Sky Park) if permanent aviation lighting was a feature of the development."

In other words, the Glenvernoch site is not a suitable site for very large wind turbine development.

The LDP does not support the GWFA.

1.2. The Electricity Act 1989

CVCC understand that The Electricity Act 1989 takes precedence over the LDP in the decision-making process for Section 36 wind farms such as Glenvernoch.

Schedule 9 of the Electricity Act 1989 sets out the environmental features which the decision maker must have regard to and identifies that mitigation must be considered. CVCC understand that the persons submitting the GWFA are Energiekontor, EK, and that they currently hold a generation licence in the U.K. Sub Paragraph 1 of schedule 9 is relevant to EK here, it states:

"In formulating any relevant proposals, a licence holder or a person authorised by exemption to generate, transmit, distribute or supply electricity

(a) shall have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest; and

(b) shall do what he reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."

CVCC believe that in submitting the GWFA that EK have disregarded (a) and that the negative impacts of the project are too significant to be mitigated.

1.3. NPF4

CVCC understand that NPF4 takes precedence over the LDP.

The official guidance for NPF4 states *"NPF4 should be read as a whole"*

NPF4 begins by emphasising the importance of creating liveable, sustainable, and productive places. It goes on to state;

"The South of Scotland is strategically important with a strong sense of identity centred on networks of towns and villages, supported by distinctive landscapes and coasts. This is a place with a rich cultural heritage and exceptional environmental assets and natural resources, such as the Galloway and Southern Ayrshire UNESCO Biosphere and Galloway Forest Dark Sky Park. This area is ambitious for positive change in the coming years, and the immediate work to recover from the pandemic will form the basis of a longer term plan to respond to the challenges of climate change and support nature restoration and recovery."

The GWFA site is located 200m west of the Galloway and Southern Ayrshire Biosphere Buffer Zone, the Galloway Forest Park and the Dark Sky Park. If the GWFA is approved the integrity of these assets will be substantially compromised.

NPF4 Policy 1 states *"When considering all development proposals significant weight will be given to the global climate and nature crises".*

The GWFA proffers that it is supported by NPF4 Policy 1.

Before this can be considered it is important to check the accuracy of the information contained in the GWFA. CVCC have noticed several errors that appear significant in that they contribute towards allowing the EIAR to overstate particular positive impacts or understate particular negative impacts of the project.

The significant factual errors that we have noticed in the GWFA are listed below:

1. In "The Planning Statement" the following misstatement occurs

   The corrected facts are underlined in the brackets.

   "The proposed Blair Hill wind Farm is located 2km south east (5km east) . Other nearby farms include the operational Kilgallioch Wind Farm, 5.8 km west, (8km west) the approved

Kilgallioch extension, 5.3km west, (10 km west) and the operational, Airies wind Farm, 7.9 km west (10 km south west).”

Figure 6.10 in the GWFA shows that the above amendments are necessary

Misstating these distances indicates that the GWFA has not correctly assessed the negative cumulative visual impact of the project.

2. It is likely that Glenvernoch Wind Farm will be developed without any form of government support mechanisms. This is not credible. CfDs, Constraint Payments, and other indirect subsidies are all support mechanisms designed by government and paid for by consumers. No large-scale onshore wind farm is viable without these government subsidies. The GWFA offers no evidence that it can.
3. In paragraph 3.62 of the Planning Statement: *‘The Proposed Development would make a valuable contribution to Government policy objectives and unmet targets thereby implementing Government policy which encourages more electricity generation from renewable energy sources.’*

   This is impossible. The GWFA cannot contribute towards meeting the government’s 2030 targets. No viable grid connection for a wind farm at Glenvernoch currently exists. None can be made available until after 2032.

   The dataset, spd-dg-connections-info was published on 26th January 2024 by SPEN, the local Network Operator. This dataset lists all of the local SPEN electrical substations and details the respective current capacity constraints that they are under. It states:

   At 5 miles distant the main Newton Stewart substation, or Grid Supply Point (GSP), is the closest GSP to Glenvernoch. The positioning of the substation at the southern end of the site indicates that EK are anticipating connecting to the National Grid at Newton Stewart. The dataset referred to above indicates that the Newton Stewart GSP currently has no spare export capacity. As a consequence, there is currently no viable connection to the national grid available for any new wind farms. The reason given by SPEN for the current absence of additional export capacity at Newton Stewart is; *“No thermal capacity, requires significant transmission works for additional projects to connect”*. The timetable which also forms part of the dataset, indicates that the significant transmission works referred to are not targeted to be completed until 2032. Past experience of large construction projects in Scotland suggests that the 2032 target will be overshot by several years.

   REMA, the Review of Electricity Market Arrangements, is a continuing exploration of what is needed to optimise the electricity market arrangements in the U.K. The latest REMA report from Autumn 2023 concluded that: *“Changes to firm access rights have the*

potential to improve investment signals, e.g. by better incentivising new generation assets not to locate behind network constraints as they would face increased volume risk (i.e., the risk that the network cannot physically accommodate their traded position due to network constraints and they are not compensated for being asked to reduce their output). Ofgem is still exploring how far changes to access rights could impact operational decisions taken by assets. However, even if the removal of firm access does not change operational behaviour, total balancing costs in a national market could reduce as affected assets would no longer be compensated by ESO when curtailed. All options provide scope for access rights to send locational investment signals, specifically to discourage investment of generation in export constrained regions and demand in import- constrained regions. There is a risk, however, that without further reforms alongside these changes, reforming access rights could have a negative impact on levels of investment needed to reach our net zero targets."

The GWFA is located in the part of the U.K. transmission network that is currently most constrained. REMA reports have consistently stated that locational price signals need to be introduced to discourage investment in export constrained regions. The GWFA cannot credibly claim that it will help to meet UK national targets when according to REMA national policy is set to evolve to discourage it being built.

1.4. The Galloway National Park

It should be noted that the Galloway Forest Park/Cree Valley Area is considered to be the heart of Galloway and was recently selected to be Scotland's next National Park.

Policy 4 of NPF4 advises:

Policy 4 (c) Development proposals that will affect a National Park, a National Scenic area, an SSSI or a National Nature Reserve will only be supported: where;

i) The objectives of designation and the overall integrity of the areas will not be compromised;

or

ii) *Any significant adverse effects on the qualities for which the area has been designated are clearly outweighed by social, environmental, or economic benefits of national importance.*

Although National Park status is not certain to be granted. The recognition that Galloway has particular natural qualities led to its designation as the preferred area for Scotland's next National Park. This indicates that policy 4(c) should apply in the case of the GWFA. The adverse effects of the GWFA on the particular qualities, that led to Galloway being judged to have met the criteria to be a National Park, need to be considered under policy 4(c).

1.5. NPF4 Policies that are Relevant to the GWFA

NPF4 should be read as a whole but CVCC consider that relevant policies to the GWFA in NPF4 are policies 1, 3, 4, 6, 11, 14, 23, 28, 29 and 30.

The most relevant being:

Policy 4, *'Natural Places'* which seeks to protect, restore and enhance natural assets making best use of nature-based solutions.

And: Policy 11, *'Renewable Energy'*

POLICY 4

Policy 4(a) considers development proposals that will have an unacceptable impact on the natural environment by virtue of type, location and scale, will not be supported.

Policy 4(d) considers the effects proposals will have on designated landscapes such as a local nature conservation site or landscape area in the LDP. The following considerations are made:

i. *Development will not have significant adverse effects on the integrity of the area or the qualities for which it has been identified; or*

ii. Any significant adverse effects on the integrity of the area are clearly outweighed by social, environmental or economic benefits of at least local importance.

Policy 4(f) allows for proposals to be supported if they meet the relevant statutory tests where it has been identified that there is likely to be an adverse effect on species protected by legislation. "*If there is reasonable evidence to suggest that a protected species is present on a site or may be affected by a proposed development, steps must be taken to establish its presence. The level of protection required by legislation must be factored into the planning and design of development, and potential impacts must be fully considered prior to the determination of any application*."

POLICY 11

Policy 11a) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

Policy 11b) Development proposals that impact on international or national designations will be assessed in relation to Policy 4.

Policy 11c) In addition, project design and mitigation will demonstrate how the following impacts are addressed:

i. Impacts on communities and individual dwellings, including, residential amenity, visual impact, noise and shadow flicker;

ii. Significant landscape and visual impacts, recognising that such impacts are to be expected for some forms of renewable energy. Where impacts are localised and/ or appropriate design mitigation has been applied, they will generally be considered to be acceptable;

iii. Public access, including impact on long distance walking and cycling routes and scenic routes;

iv. Impacts on aviation and defence interests including seismological recording;

v. Impacts on telecommunications and broadcasting installations, particularly ensuring that transmission links are not compromised;

vi. Impacts on road traffic and on adjacent trunk roads;

vii. Impacts on historic environment;

viii. Effects on hydrology, the water environment and flood risk;

ix. Biodiversity including impacts on birds;

x. Impacts on trees, woods and forests;

xi. Proposals for the decommissioning of developments, including ancillary infrastructure,

and site restoration;

xii. The quality of site restoration plans including the measures in place to safeguard or

guarantee availability of finances to effectively implement those plans; and

xiii. Cumulative impacts

With reference to the above NPF4 policy 11(c) CVCC suggest that the GWFA fails to meet the requirements described above.

3. Specific Points of Objection

CVCC believe that the GWF as described in the GWFA must not receive planning consent. Glenvernoch is not the right place to erect very large wind turbines. The proposed development does not align with either national or local planning policy. The GWFA has numerous shortcomings that viewed together make it apparent that the proposal is contrary to the provisions of NPF4, the Electricity Act 1989 and LDP2.

The following CVCC Points of Objection illustrate the major shortcomings of the project.

3.1. Poorly Designed and Dangerous

The Glenvernoch Wind Farm is an example of very poor design both aesthetically and technically.

Aesthetics

Good practice dictates that a Wind farm should be designed to fit within a landscape (ref Dumfries and Galloway Council LDP2: Wind Energy Development: Development Management Considerations). One of the overriding factors governing the design process is consideration of the topography of the site and surrounding area.

It appears that the determining parameter within the design evolution of the GWF was the requirement to fit it within a fixed boundary. The Environmental Impact Assessment Report Volume I, Chapter 4: Design Evolution, indicates that this was the case. The residential buffer radii and the presence of a peat bog dictated that only a botuliform shaped area running along the back of the farm was left available to build wind turbines on. The finalised design drawings for 13 turbines show two parallel meandering rows of six turbines running SSE to NNW together with a thirteenth single turbine, T3, placed where the neighbouring forest boundary protrudes.

The visualisations from Viewpoint 6; LVIA, VP D and VP F ; GAV, all show that the GWF will appear to be two tangles of turbines. An aesthetic dog's breakfast of a design that looks more like all of the tools poking out of two Swiss Army knives that had been dipped in white paint before being planted in the ground.

The design is over complex with overlapped turbines being particularly visible from the north and from the south. There is no visible pattern in the layout of the windfarm. The positions of the individual turbines do not relate to the topography of the site, nor do they appear to have been placed in any recognisable geometric pattern.

Technicalities

Community Wind Power are a British company who build and operate wind farms. They have a design tool, Renewables First, which gives advice to landowners who are contemplating providing land to build a wind farm on. It states:
"The number of wind turbines depends on how large the site is. The wind turbines themselves need to be around '5 rotor diameters' apart so that they don't affect each other with turbulence. For a 500 kW wind turbine this means 250 metres apart, and for a 2.5 MW wind turbine it is 410 metres. You can see from this that you need a lot of available land to host several wind turbines, but provided you have a site with the space, the land between the wind turbines can still be used for farming etc. with effectively zero impact from the wind turbine."

The 96 turbines that are on the SPR Kilgallioch Wind Farm all sit 5 rotor diameters apart from each other.

The spacing between wind turbines varies between different sites. An article in an industry journal states:

"Evidence is that the manufacturer-recommended separation distances of 7 to 8 rotor diameters for turbines in line with the prevailing wind and 5 rotor diameters for turbines abreast, still allows turbulent air exiting one turbine to retain significant turbulence when entering the next; so the manufacturers' recommended spacings can be considered as an unfortunate compromise and inadequate to contain noise. The most efficient turbine spacing, i.e., that which allows the turbines to economically extract the most energy from the wind, has been shown to be some 15 rotor diameters."

The turbulence and wind blocking that are a direct function of wind turbine separation distances should be governing factors when designing wind farm layout. (Professor Charles Meneveau is the most prominent scientist who has researched this over the past 10 years. His findings are interesting). The designers of the GWF have not taken account of this. Whilst the optimum separation between neighbouring wind turbines varies between different wind farms; when all of the factors which dictate technical efficiency and longevity are taken into account there is one hard fast rule that the industry accepts. Wind turbines in any wind farm must always be separated by at least 3 rotor diameters in distance.

A close examination of the GWFA plans reveals that the separation distance between the centre of the turbine bases for:

T 7 and T 8 is **400m**

T 3 and T 4 is **430m**

T 4 and T 7 is **450m**

T 10 and T 12 is **460m**

T5, T6, T9, and T11 are all **480m** apart.

The rotor diameter given by EK in the GWFA is 150m.

3 x Rotor Diameter = **450m.**

The typical length of the protruding nacelle added to depth of the typical turbine blades for a 6 MW wind turbine as specified in the GWFA is over 20m.

Hence turbines require to be centred **470m** apart to be separated by 3 rotor diameters.

The design of the GWF is technically flawed. The plan shows a layout that fails to meet the accepted technical standards for minimum separation distances between adjacent wind turbines:

T 7 and T 8 are only 2.5 rotor diameters apart

T 3 and T 4 are 2.7

T 4 and T 7 are 2.9

The others listed above are only 3.

The design is not only technically flawed. It is unsafe. The SSE to NNW alignment of the twin rows of Glenvernoch turbines matches the direction of the very strong winds that can channel up the Cree Valley when a storm approaches.

The turbulence caused by a row of turbines with a downwind separation of less than 3 rotor diameters could ultimately prove to be catastrophic to several of them with potential serious risk to public safety.

The GWFA should be refused on safety grounds alone.

No one should be put at risk of being struck by chunks of flying fibreglass.

3.2. Landscape and Visual Impact

Introduction

The Scoping Opinion for the GWFA issued on behalf of Scottish Ministers on 7th February 2024 states:

"3.20 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions"

CVCC have not been consulted by EK at any time since the Scoping Opinion was released. The viewpoints that were finally selected for assessment in the EIAR by EK were chosen without any discussion between EK and CVCC.

In our Scoping Response CVCC recommended several additional viewpoints to EK. Both the Scoping Opinion of 24th February and the NatureScot official guidance clearly indicate that EK should have included these additional viewpoints in the GWFA LVIA, or alternatively, provided justification for not including them. EK declined to do either. This has led to the unsatisfactory situation where CVCC have had to commission a supplementary set of visualisations to illustrate the likely visual impact of the GWF on receptors at important vantage points in the Cree Valley that EK have preferred to ignore.

The CVCC supplement to the LVIA, 'Glenvernoch Wind Farm – Additional Visualisations' - (GAV), see Appendix 1.

The viewpoints listed in it are denoted by the letters A - F and are referred to below as VP A - VP F. The GWFA Viewpoint Assessment in EIAR Volume III Appendix 6.5, LVIA, lists the viewpoints chosen by EK as VP 1 to VP 20.

CVCC wish to point out that since the human eye is attracted to movement, the turbines that are imagined in the visualisations LVIA and GAV will be more prominent in reality than these visualisations suggest. It should also be borne in mind that the shadows and the light reflecting from the white surfaces of the blades as they rotate will flicker and draw the viewers eye in certain light conditions.

(It should be noted that the VP B is 400m southeast of VP 2. EK prefers to conceal the magnitude of the visual impact on drivers heading south on the A714 by siting VP 2 on the forest edge where the GWF is mostly concealed by the foreground. CVCC requested VP B at the scoping stage. VP B was chosen because it is the point on the road where the view of the Cree Valley opens up revealing itself to road users heading south. Likewise, VP F was requested by CVCC, but the GWFA shows visualisations, for VP20, prepared from a photograph taken from down in a field 200 m to the NE).

An Unacceptable Visual Impact

CVCC consider that the GWF will have an unacceptably high level of negative visual impact on those who live and work in and around the Cree Valley area. Those who are on holiday in the area or are just passing through will have their ability to enjoy the local scenery adversely impacted by the intrusion of the GWF in what is currently a landscape highly valued for its natural scenic qualities.

The scale of the overall visual impact that the GWFA is proposing for the Cree Valley can be seen in GWFA Figure 6.16 Blade Tip ZTV out to 20km, and GWFA Figure 6.22 Hub Height ZTV out to 20km. Both ZTVs shows that at least the top half of all thirteen turbines will be visible in all open views in the Cree Valley. This is further emphasised in the visualisations produced for VP B at the northern end of the Cree Valley, and VPs D and VP F 14 km to the south. All 13 of the GWF turbines will be seen from each of these viewpoints. The entirety of them from the base of the tower to the tip of the blades will be visible from VP B. VP B is situated where all road traffic heading south on the A714 enters the Cree Valley proper. The A714 is the main north south artery connecting South Ayrshire to the A75 trunk road at Newton Stewart and is the preferred route south for tourists heading to enjoy the scenery and trails in an around the Galloway Forest Park.

Typically, in Scotland, the site chosen for a large wind farm is on fairly remote, indistinct upland well away from areas of settlement. The turbines of any large wind farm that is closer than normal to a town in a valley, are sited several hundred meters above the valley floor and are concealed from being seen by the shoulders of the valleys and the folds in the hills. Those living in the valley generally only catch glimpses of the distant turbines as they travel through the surrounding area. The common perception that can then take root is that since the wind farm is safely tucked away nestling in the hills above and mostly out of sight, it is acceptable.

It is very unusual for a wind farm to fully expose itself in the way that the GWF intends to. Seventeen out of the twenty viewpoints selected by EK for the LVIA are described in the EIAR as having theoretical visibility of all thirteen of the turbines. The others have visibility of 12, 8, and 8 turbines respectively. This is virtually complete visibility.

Extensive Visibility

In essence, the extensive visibility, is a consequence of the GWFA being sited in a prominent location inside the Cree Valley.

The eastern edge of the Cree Valley runs along the bottom of the lower slopes of the Minnigaff Hills which rise quickly within a short distance of the river. The western edge of the valley is less clearly defined but it can be viewed from VP B as a watershed running southwards from the Fell of Ochiltree, 182m, into the forest and over the summits of Glassoch Fell, 151m,and Glenhapple Fell, 138m, continuing south through VP E (Barskeoch , 102m, and finally ending

on Barraer Fell, 123m, where the valley itself dissipates into the lowland Machars landscape and the river itself, 5 km to the east, becomes a tidal estuary. The western edge of the Cree Valley forms essentially the western skyline as viewed from anywhere in the Cree Valley and the western fringe of the Galloway Hills.

The GWF sits at the 100m AOD level inside the western lip of the Cree Valley where the edge of the valley sits at the 150m AOD level approximately 2km to the west. The GWFA is a proposal to construct thirteen 200m tall wind turbines that will rise 150m above the western skyline as seen from any open vantage point within the Cree Valley. If it is built, the GWF will dominate the view to the west from everywhere within the Cree Valley and from the western Galloway Hills.

It is apparent that EK did not appropriately consider the topography and landscape of the MGWW before embarking on the Glenvernoch project. We maintain that they did not adequately appraise enough alternative sites for the project. If they had done so they may have realised that the areas of commercial forestry that lie above 150 m AOD on the afforested plateau moorland to the west are more appropriate locations for a very large wind farm.

Fundamentally we consider that the enormous visual impacts of the GWF that have been illustrated in the LVIA and Glenvernoch Wind Farm Additional Visualisations, GAV (Appendix 1), are a direct result of the impulsive reaction EK have made to the introduction of NPF 4. EK appears to have chosen to make an assumption that it was worth submitting proposals for wind farms near to sites such as the Hill of Ochiltree where a wind farm application had previously been refused. EK do not appear to have considered anywhere beyond the farm boundary before they began working on the GWFA. If they had looked further, they would have realised what their own LVIA and the GAV supplement are telling them. The Glenvernoch landscape does not have the capacity to host a very large wind farm.

3.3. Cumulative Effects

Cumulative effects may be defined as '*the additional changes caused by a proposed development in conjunction with other similar developments or as the combined effect of a set of developments, taken together' (SNH, 2012: 4)*'. In terms of visual cumulative effects these may be considered as '*effects that can be caused by combined visibility, which 'occurs where the observer is able to see two or more developments from one viewpoint' and/or sequential effects which 'occur when the observer has to move to another viewpoint to see different developments' (SNH, 2012: 11)*'

It is not easy to fully grasp the concept of cumulative impacts when it comes to wind farms and wind turbines. Certain definitions imply that the concept directs developers to spread wind farms out all across the landscape to protect one area from having too many. Other definitions imply that it directs developers to keep them close together to protect the wider area from having wind farms popping up sporadically in every direction.

CVCC believe the concept to imply that the relationship between separate wind farms must be discernible and conform to a pattern that can be clearly understood by anyone who is prepared to take the time needed to study how the separate wind farms within a particular area relate to each other. And that any proposed new wind farm development in an area should not break the established pattern of wind farm development in that area. Otherwise, the cumulative impact of the new wind farm would be assessed as very high.

The more Wind farms there are and the bigger the wind turbines get, the more difficult it becomes and the more important it gets to maintain an existing pattern of development, particularly when the stage is reached that a landscape with wind farms starts to become a wind farm landscape.

The development of the Kilgallioch wind farm cluster has created a wind farm landscape and confirmed the established pattern of development which any new wind farm proposal in the MGWW area must adhere to. The established pattern being that the new development should seem as if it has sprung out of or grown organically from the existing wind farm cluster and rooted itself closely enough to it to be perceived as having a relationship to it.

The GWFA does not respect the established pattern of wind farm development in the MGWW area. It does not appear to have any relationship with any other wind farm at all. It is an outlier in all respects and if consented it will have an enormous cumulative impact throughout the surrounding area.

The following observations on the visualisations provided in the LVIA underline the severity of the adverse cumulative impacts that will be suffered if the GWF is consented.

The View from the East

Viewpoints 12, 13, 14 and 18 are all situated to the east of the GWFA. In the wireline drawings for them, the hundreds of turbines in the Kilgallioch Cluster appear peppering the far distance at approximately 20 km from the Viewpoints. The Kilgallioch Cluster is defined by the CVCC to be the group of windfarms in Wigtownshire and South Ayrshire that are contiguous and have Kilgallioch and Arecleoch as its two largest members. In all four cases, the turbines of the GWFA, at very approximately 10 km away, appear as very much bigger dominating the foreground. Their intervisibility with those already present on the horizon gives rise to additive cumulative effects.

The perception of anyone standing at any of these viewpoints is currently *"Wow what a view, a bit windy no wonder they built all these wind turbines away out there, great that they don't interfere with this beautiful view, now I wonder how many I can see".*

If the GWF is built the current perception will change to *"My goodness what a big wind farm, it starts just down there and goes on for ever, they have maybe gone a bit far with that, I mean them spinning so close is a wee bit distracting it is spoiling the view and my day, I don't know if I want to come back, I want to look at wild and beautiful land not a forest of wind turbines."*

The View from the West

Viewpoints 1, 5, 6, 7, and 8 are all situated to the west of the proposed GWF. There are currently no wind farms between them and the Minnigaff Hills which rise up in front of them from beyond Glenvernoch. (Except for VP 5 from which 5 of the turbines in the Airies Wind Farm are visible to the right in the field of view; and likewise, VP 8 has the viewer peering out from the Kilgallioch wind farm). What is of overriding importance to any analysis of the cumulative visual impact of the proposed GWF is to consider what a viewer at any one of these five viewpoints would see if he turned around and looked at what was behind him.

At all five of them the viewer would see hundreds of big white wind turbines lined up like giants that he might perceive to be either threatening or protecting his back. The GWFA proposes to obstruct his view ahead with thirteen more giant sentries standing 10 km or so in front of him waving their arms at him and barring his minds escape to the hills in the distance so that rather than the viewer perceiving *"wow these guys behind are awesome but I am glad that there is an end to them and I can see the way to the hills ahead otherwise they could start to get to me and drive me mad".*

If the GWF is allowed to be built his perception would change to" the *incessant whirring and groaning, the spinning, I can't think straight there are millions of them, there is no escaping them!''.*

The GWFA is a proposal that if consented would break the established pattern of wind farm development in the area. The cumulative impacts that would result from this are of such significance that it must not happen.

Other Local Wind Farm Proposals

The scoping report for the nearby Shennanton wind farm, ECU 00005101, was published on the 19th of September 2024. It is at the pre-application stage and as such the GWFA should have included it in the cumulative assessment within the GWFA, which submitted on the 19th of November 2024.

We note that the pre application Blair Hill wind farm, ECU 00004878, is included in the GWFA.

3.4. Impact on Amenity in the Cree Valley

The concept of amenity is an abstract quality, so it is difficult to define its precise meaning by using words alone. In planning terms, CVCC understand the meaning of amenity to be both the quality of a place that makes it enjoyable to live there, and the joy that can be derived from being in a particular place or engaging in a particular activity.

CVCC believe that the GWF will negatively impact the amenity of the Cree Valley. We maintain that it will substantially diminish the quality of place experienced and enjoyed by both local residents and those who are visiting the area for a short time.

The Qualities of the Cree Valley

The Cree Valley lacks many of the facilities that urban areas enjoy. It doesn't have shopping centres, football stadiums, music venues, Deliveroo or an IKEA.

However, it does have a quiet, beautiful, scenic and unspoilt natural landscape. This is the quality that brings joy to those who live here and to those who visit. The area is renowned and recognised for these qualities being designated as a regional scenic area and international Dark Sky Park.

In our view EKs proposal would destroy the scenic natural qualities of the Cree Valley to make way for thirteen industrial wind turbines ten times the height of an IKEA warehouse. The GWFA, if approved, would strip the surrounding area of much of its amenity and steal some of the joy from the everyday activities of those who take pleasure in its landscape.

Residential Amenity

CVCC reiterate comments made in their Scoping Response:

"With regard to RVAA we do not accept that a 2km study area is sufficient. The turbines planned for Glenvernoch are described as being 200m tall. Significantly taller than any of the 300 turbines which currently stand between 10km and 25 km west from Glenvernoch. It is proportionate to suggest that, in order to respect the principle of proportionality inherent in EIA, that the 2km RVAA study area should be significantly increased in size to reflect the size of the turbines proposed. Whitecairn, Bargrennan Cottage, Creebank Cottage, and Creebank Farmhouse may lie just beyond the proposed 2km study area. These properties currently enjoy magnificent uninterrupted views across Glenvernoch. They require to be scoped into the RVAA study area"

The principal of proportionality is inherent in all true assessment. By ignoring the reasonable request of CVCC, EK appear to be denying the truth of this statement.

CVCC believe that the Residential Visual Amenity of the properties listed above will suffer significantly if the GWF is built. As will that of the properties that were included in the RVAA. And also, that of any property that is shown in the yellow area of the ZTV, GWFA Figure 6.22, as being situated where there is Visibility of all 13 GWF turbines.

The GWFA should be refused because it will have an unacceptably high and overbearing negative impact on a significant number of properties in the Cree Valley

General Amenity

CVCC state above that it is the "quiet, beautiful, scenic, natural landscape that gives the Cree Valley its amenity." We accept that the GWF will not prevent people from driving on local roads, going mountain biking, walking the dog, hillwalking taking children or grandparents for a run, and playing 5 asides at Blairmount Park. However, peoples experience of these activities will be adversely impacted due to the overwhelming visual intrusion resulting from the development as confirmed by the applicants own ZTV s and visualisations presented in the LVIA.

In our opinion the theoretical level of noise generated by the turbines may not breach any legal thresholds, but their unnatural mechanical sounds will be audible downwind of them at irregular intervals depending on the wind direction at the particular moment. The amenity of those seeking escape from technology and an engagement with nature will suffer a significant negative impact.

There are a number of footpaths very close to the Glenvernoch site. Those at Penninghame Pond, Wood of Cree, Barclye, and the Southern Upland Way are closest. Should it be consented, the impact of the GWF on the amenity of those out walking searching for solace in the serenity of their surroundings will be most profound. Whether they are convalescing, seeking salvation for a troubled mind, or simply walking off the stresses of the day, the sight and sounds of the turbines of the GWF will be a distracting feature intruding in what currently is a peaceful and tranquil setting. We maintain that the GWF proposal is too big and too close, and that its overbearing presence will frustrate those trying to take comfort from the natural landscape of the Cree Valley.

Outdoor Recreational Amenity

Anyone who is regularly out and about in the Cree Valley will experience an impact on their amenity. Two groups who we consider will suffer a large impact are hill walkers and cyclists.

Hill Walkers

Newton Stewart is known as **"The Gateway to the Galloway Hills"** for good reason. The main trunk road, the A75 bridges the River Cree here and the Galloway Hills slope down to touch the northern edge of the town. Prominent Galloway Hills such as Garlick Hill and Lamachan can be climbed from the town, but most hill walkers take the A714 heading north up the Cree Valley to Glentrool where they can park up and walk the Merrick path to the summit and into the heart of the Wild Land Area.

The annual Newton Stewart Walking Festival is held in May. The 2022 programme was introduced thus:

"Often described as Scotland's best kept secret, Galloway is a wonderfully unspoilt landscape with an endless variety of routes for walkers to enjoy. Walkfest offers around 30 routes over 7 days, with transport and guides included, as well as a programme of evening social events."

On the 12th of January 2025 the Glasgow Herald reported:

"No wonder the annual Newton Stewart Walking Festival – said to be Scotland's oldest – is so popular, with the sort of scenery the wraps itself around Newton Stewart and the wider area. It now offers its many repeat visitors 30 routes. If the new Galloway National Park gets the go ahead the UK's first forest park will no doubt be at the heart of Scotland's third largest park. It is already a key part of the Galloway and South Ayrshire Biosphere Reserve. The area is also ranked for its Dark Skies, with tours available to help you discover them. Newton Stewart is already a Dumfries and Galloway market town with real heart set in a remarkably scenic part of Scotland. Those already in the know enjoy its quiet charms unfettered by the masses – on many local hikes you see more wildlife than people in this Gateway to the Galloway Hills. If national park status comes the secret will finally be out"

The above clearly explains that it is the remarkable natural scenery that hill walkers come to the area to enjoy. Significantly, the GWFA has neglected to consider the visual impact the proposed GWF would have on hillwalkers climbing Cairnsmore of Fleet. Cairnsmore is easily accessible from Newton Stewart and climbing it is a very popular local activity. If it is built the GWF will be highly visible from the summit of Cairnsmore yet the GWFA does not include any visualisation from this favourite viewpoint as requested by CVCC in their scoping response.

If the GWFA is consented the amenity of hill walkers will be negatively impacted.

Cyclists

Cycling the minor roads, the forest roads, and the recognised cycle routes is becoming a popular activity in the area. The main attraction is again the natural scenery.

The Glentrool Big Country Route and NCN Route 7 run together, parallel to the eastern boundary of the GWFA for 11km, from Minnigaff Church to Borgan.

The GWFA explains *"6.270 NCN Route 7 is one of the primary long-distance recreational cycling routes in the UK, extending in sections between Sunderland and Inverness. Sections of the sea-to-sea route lie in proximity to the Proposed Development, with the closest point of the route lying approximately 1.2km east of the nearest proposed turbine."*

The GWFA later goes on, *"6.278 From Borgan to Cordorcan, receptors would experience close range views of the proposed turbines. Over this section of the route, which extends to approximately 2.5km, the proposed turbines would frequently be witnessed above the horizon and against the skyline. Occupying a large lateral extent of the view, the proposed turbines would appear prominent and exert a strong influence in views owing to proximity. As a result, a high magnitude of change is predicted from this section during daylight hours. A high magnitude of change combined with the high sensitivity of the receptors would result in a major, significant effect during daylight hours."*

The above is accurate except that the section of NCN Route 7 along which these major, significant effects would be experienced is the 11km section from Borgan to Minnigaff Church. While travelling along this section of the route, the topography of the landscape is such that the receptor nearly always commands the view towards Glenvernoch to the west, from an elevated position. The ZTV, GWFA Figure 6.22, confirms that a travelling receptor will theoretically see the entire wind farm for 11km.

All of the above applies to the Glentrool Big Country Route which runs in conjunction with Route 7 for all of the 11km.

Touring and weekend cyclists are becoming a regular feature on many minor roads in the Cree Valley. These roads are relatively quiet and give an opportunity for hobby cyclists to safely revel in the local scenery. This group will have their amenity impacted negatively. VPs 6, 7, 11, 17, and VPs F, A, B, and D are all located on roads that they often travel on.

The amenity of Cyclists is threatened by the GWFA.

Rural Workers

There are regularly around 100 people working outside within 20 km of the Glenvernoch site. These include farmers, farm workers, forestry workers, landscape contractors, and construction workers. The spectacular scenery they see on a good day compensates them for the wind and rain they suffer on a bad day. Their custodianship gives the landscape its value, their amenity deserves protection.

The GWF will have a significant negative impact on amenity. It must not be built.

3.5. The Merrick Wild Land Area

As the GWF will be seen from within the Merrick WLA, it has the potential to give rise to indirect, perceptual effects which affect how parts of the wild land area and its wildness qualities are experienced.

Despite this, the GWFA does not include any assessment of its effects on visual receptors within the Merrick WLA.

In their Scoping Response to the GWFA, CVCC stated: "The Glenvernoch site is 8 km from the Merrick WLA. It lies west of and adjacent to the Galloway Forest Park and the Regional Scenic Area within which the Merrick WLA is contained. The upland landscape surrounding and including the Glenvernoch site is composed of permanent pastures which run up against coniferous forests which in turn stretch up to and end as they open out onto the wild land tops of the Minnigaff Hills. The Glenvernoch landscape is perceived as being intertwined with and part of the wider Galloway landscape, which includes the Merrick WLA, and consequently cannot be considered as divorced from it by Energie Kontor. An assessment of effects on wild land must be included in the LVIA otherwise the Glenvernoch Wind Farm EIAR will be deficient and unfit for purpose."

In their Scoping Response to the nearby Blair Hill Wind Farm CVCC emphasised the importance that they attach to protecting the wild land that lies at the heart of the Galloway Forest Park: "With regard to landscape and visual matters. We do not agree with the approach suggested. The proposed Development is a Windfarm in a Regional Scenic Area on the edge of the Galloway Forest Park. The site is contiguous with the large tract of unspoilt wild land which forms the Minnigaff Hills. The Minnigaff Hills are the uplands of Minnigaff Parish, Scotland's largest Parish, and include the Merrick. The wind farm site is 6km from the Merrick WLA, being conjoined to it by unpopulated wild upland, identical in landscape character to the Merrick WLA. The Minnigaff Hills are perceived by both locals and visitors as being a single tract of wild land The wild undesignated hills of Larg, Lamachan and Curleywee are not perceived as either separate or different to the WLA designated hills of Benyellary and Craignaw. The EIAR cannot ignore this reality. If consented the Blair Hill Windfarm Farm has the potential to have significant adverse effects on the visual amenity of the Minnigaff Hills and the Merrick WLA with consequent significant adverse effects on the local tourist economy and the quality of life of local residents. The impacts on the Merrick WLA must be included in the EIAR."

In both Scoping Responses CVCC inferred that it was an oversight by SNH not to include the summits of the southern Minnigaff Hills in the Merrick WLA. Curleywee, Lamachan, Larg, and Milfore all stand above 650 m. The wild montane ecology of their summits and their upper slopes are linked to the Merrick WLA for a distance of 3km on its current southern edge at the watershed between Loch Dee and Loch Trool. We understand that our inference may carry

little weight but, since the technical guidance acknowledges that, *"perceptual responses cannot be mapped".* we humbly request that the veracity of what we suggest is taken into account.

"The term wild land qualities encompasses both physical attributes and perceptual responses – reflecting that it is a combination of factors that contributes to the value and appreciation of wilderness"

Description of the Merrick WLA 2017, includes the following:

"A wild land area that contrasts with the adjacent Forest Park, especially in terms of human activity. There is a noticeable difference in terms of human activity between the WLA and the surrounding parts of the Forest Park. Whereas the Forest Park is popular as a recreational destination and contains numerous visitor facilities, the WLA is much more lightly used, with little obvious recreational provision, providing a relatively strong sense of remoteness and solitude. Looking towards the WLA, the open moorland contrasts noticeably with the forest plantations that surround the WLA, so highlighting the inspiring qualities of the rugged mountain backdrop when experienced from the surrounding Forest Park. "

The relevant guidance states:

"The impact of development outwith a WLA will require careful justification and consideration. A wild land assessment should only consider effects on the qualities of the WLA as they are experienced from it, not from outwith it. This is in contrast to a scenic or landscape designation, whose appreciation from outwith is part of the standard LVIA approach".

However, *"The protection of wild land qualities as set out in SPP, means that only in exceptional circumstances relating to scale, siting or design will development outwith WLAs have a significant effect."*

CVCC believes that the GWFA is an exceptional circumstance as described above, and that an assessment on the effects on the Merrick WLA should have been included in it.

Circumstances indicating the need for a WLA Impact Assessment:

1. Nature of the typical receptor: Hill walkers. Viewers whose attention is focused on the character of the landscape and who are likely to have a high sensitivity to change in that landscape.
2. The GWFA turbines are very large, and the site is just over 8km from the Merrick WLA
3. There are no operational or consented wind farms visible beyond the GWFA site, which lies due south of the Merrick summit. There are no wind farms visible to the East either. The closest operational or consented wind farms to the WLA are 19km distant in a south-west direction; Chirmorrie and the Arecleoch Extension.
4. The LVIA, VP 12 shows that the full height of all 13 turbines in the GWF will be visible from the summit of the Merrick.
5. There is a very high potential for cumulative visual impacts owing to the presence of several hundred wind turbines in the field of view.

All of the reasons listed above underline that the GWFA should include an assessment of impacts on the WLA. In the absence of one being submitted by EK, CVCC feel compelled to offer their own appraisal. In doing so, CVCC acknowledge that assessing the indirect, perceptual effects which affect how parts of the wild land area and its wildness qualities are perceived is a subjective exercise, but believe that they are well placed to do so because they represent the community whose members are most likely to have climbed the Merrick most often. Therefore, the perceptual responses that they have discerned are likely to be accurate.

Nature Scot Wild Land Description Merrick 2017 states:

"The high level of recreational use within the Forest Park is generally screened from within the WLA and consequently has less effect on the sense of remoteness, sanctuary and solitude. There are very few obvious paths within the WLA, but the main path to the Merrick from the south is well-used and the scar that has resulted has a localised impact on the sense of naturalness and sanctuary."

And,

"Operational windfarms can also be seen from the Merrick and other tops. Although most of these are too distant to impose noticeably upon the wild land qualities, they appear as obvious human artefacts and some to the west are sufficiently close or extensive to be clearly visible, so reducing the sense of sanctuary. Other than the radio mast on Bennan, which lies just beyond the WLA to the south, there are very few other human artefacts evident."

CVCC Appraisal of the GWFA Impact on Wild Land

All of the existing and consented wind farms mentioned in the GWFA lie beyond 19 km to the southwest of the Merrick excepting Mark Hill and Knockodhar which lie 12km to the west. The view experienced from the summit of the Merrick is a full 360-degree panorama of the southwest of Scotland. Just over a quarter of which, the southwestern quadrant, has the hundreds of turbines of the Kilgallioch and Arecleoch clusters sprouting up in the middle distance. There are more wind turbines further away in the northern quadrant, but they appear insignificant compared to those to the southwest.

An observer at the Merrick summit can be unsettled by the sheer number of wind turbines when he looks to the west, they disrupt his view to Ailsa Craig, but they appear distant enough not to appear to threaten the integrity of the wildness of his surroundings. If the viewer turns and gazes out to the north and then all the way round to the southeast the views are comprised of remote rugged mountains and the lochan dappled moorlands that are the heart of the WLA. The observer can sense the wilderness as they look further east beyond Loch Enoch and Craignaw towards the Rhinns of the Kells in the distance.

When the observer turns to look south, Benyellary begins to dominate the foreground, but the eye is drawn down to the green fields of the Cree Valley and across the Machars towards what seems to be the sea. The Knock of Luce with Luce Bay shimmering behind it and the Mull of Galloway beyond, with the Isle of Man or Ireland and what might be the Lake District visible on the horizon.

When the observer's field of view returns to the southwest, their senses are so overwhelmed by the primal natural beauty of the surroundings that they can forgive the forest of wind farms that spoil the view to Ailsa Craig. Filled with awe at the beauty of the Merrick Wild Land Area, the observer can then enjoy the journey back down the footpath over Benyellary and towards Loch Trool.

Should the Glenvernoch Wind Farm be built, the viewers experience will be the same until on turning to look south they will see the GWF in full, dominating the view over Benyellary. they won't have the Mull of Galloway in his mind, or the Isle of Man, all they will be thinking is *''why on Earth did they have to build another Wind Farm just there could they not have put it a bit further away over next to the other ones. They have gone and spoilt the view from this wild and beautiful place''.* Rather than being filled with awe at the beauty of wild nature, they will be doom laden with dread at where the next wind farm will spring up. Then ,heading for home, still in the WLA, by the time the viewer crests Benyellary and surveys the *"well used scar of a path"*, and dead ahead the *"radio mast on the Bennan"* with the Glenvernoch Wind Farm looming large behind it, any sense of sanctuary, wildness, remoteness or solitude that they had experienced will have weakened and withered away to nothing.

CVCC consider that the effects of the proposed GWF on the wildness qualities of the Merrick WLA when the existing, consented and application stage windfarms are considered cumulatively along with the Bennan radio mast, are of such significant magnitude that the GWFA must be refused.

3.6. Southern Upland Way

The Southern Upland Way was Britains first official coast to coast path. At 212 miles long it is Scotlands longest walking route. It is an important national asset that passes through the GWFA site on its way east from Portpatrick to Cockburnspath. The section of the SUW running from Castle Kennedy to Bargrennan Bridge, (immediately adjacent to the GWF) will be significantly impacted if the GWF, is consented. This significant impact will be a cumulative visual impact; the direct consequence of the significant increase in the distance, and length of time that anyone going along the SUW will find themselves walking amidst a wind farm rather than walking away from the wind farm behind.

EK have neglected to undertake any sort of rigorous sequential cumulative analysis of the visual experience of walkers as they move along the SUW. Although, the GWFA does provide visualisations that can be interpreted to illustrate the magnitude of the change that will be experienced by a walker heading east along the SUW. Currently in the absence of the GWF, a walker at VP 8 perceives himself to be getting close to escaping the Kilgallioch Wind farm cluster, At VP 7 he is well clear of it and his attention is fully on the Minnigaff Hills looming ahead. At VP 1 the Minnigaff Hills from Cairnsmore in the South to the Merrick in the north fill his view ahead. At VP 4 he is filled with anticipation as to what lies in the forest and hills ahead.

If the GWF is built, the walker will not perceive themselves to be exiting the wind farm until they reach VP 4 at Bargrennan. Instead of the walk from Castle Kennedy consisting of an initial 13km winding towards the uplands and the approaching Kilgallioch wind farm cluster, followed by an 18km wind turbine dominated traverse of the cluster, and a final 12km hike dominated by spectacular views of the hills ahead. Should the GWFA be approved, the walk will simply consist of an initial 13km approach followed by a full 30km walk through a windfarm.

The standout quality of the SUW is the shear variety of landscapes that anyone traversing the route experiences in the two or three weeks that it takes to walk it. That was certainly the experience of the author here when he walked the route with his young sons over many weekends 20 years ago. The varied landscapes that the route passes through made every day a different experience. There were only two wind farms at that time. Now the route is in danger of being overwhelmed by them. East of New Luce, as described above, the Kilgallioch cluster now dominates the SUW, and from Ulzieside to the Lammermuirs there are many more wind farms lining sections of the route. It is important to emphasise that wind farms have added drama and interest to the SUW in certain sections where the landscape previously lacked it. The issue that requires to be addressed is the cumulative impact on the SUW of the huge number of wind turbines that can be seen from it. If this is not addressed the perception

that it is a scenic route could soon be replaced by the perception that the SUW is a 200 mile walk through a windfarm.

CVCC believe that, if built, the GWF will increase the length of the SUW that is perceived as being within a wind farm by 12km and that it will create a significant cumulative visual impact when all of the existing and consented wind farms along the route are factored in.

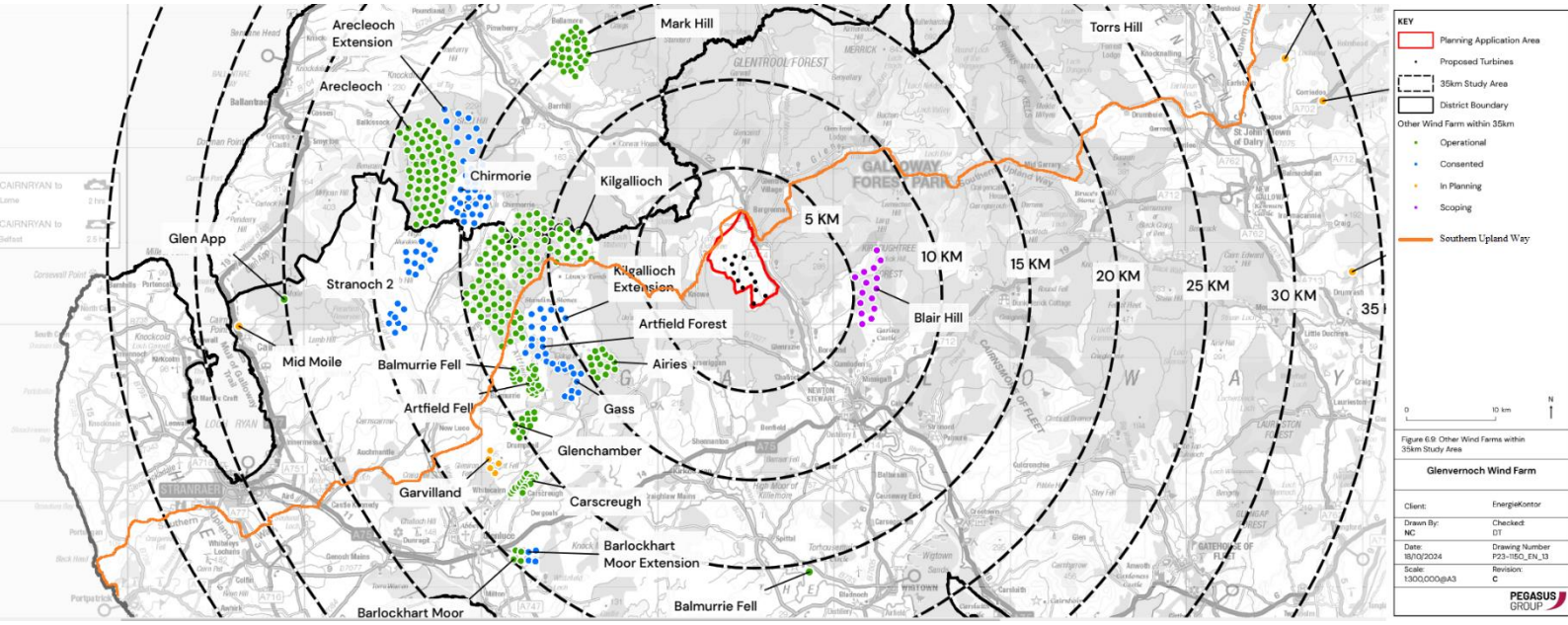


Figure 1 – Southern Upland Way Superimposed on GWFA Figure 6.9: Other Wind Farms within 35km Study Area

3.7. Shadow Flicker

The Cree Valley does not enjoy extended periods of good weather so when the sun does shine, local residents like to be out in the garden in the evenings. Shadow flicker from the GWF will destroy the chance of any of the residents of the houses affected enjoying a spring or summer evening without being flashed at by at least one of the thirteen giant turbines towering above them.

Figure 13.1 Potential Shadow Flicker Receptors, from the GWFA, identifies a shadow flicker zone which includes a 5 km length of the A714 and a parallel 5km length of the Wood of Cree minor road. The GWFA neglects to assess the road safety implications of shadow flicker, particularly at Clachaneasy where two minor roads intersect with the A714, one from the East, and one from the west. The visualisations for VP 19, at Borgan, and the shadow flicker calculations for the cluster of houses nearby both indicate that shadow flicker will be a significant problem for all drivers on the A714 at times when there is strong evening sunshine.

It is the unsuitability of the Glenvernoch site that creates this issue. The GWFA should be rejected to keep the A714 at Clachaneasy safe and to preserve the residential amenity of nearby properties.

3.8. Cultural Heritage and Archaeological Impact

CVCC objects to the Glenvernoch Wind Farm, GWF, because it will have a significant adverse impact on the integrity of the setting of many of the scheduled and non-scheduled archaeological remains within 10 km of the Glenvernoch site.

Bruces Stone (Scheduled Monument LB52395)

The proposed GWF will stand 9km to the west and in full view of Bruce's Stone which sits above Loch Trool. The wild and beautiful landscape between Loch Trool and Loch Doon is considered by many to be the *"Cradle of Scotland's Independence"*. Seminal Scottish history was enacted in this terrain. The landscape encapsulates the very heart of Scotland where the first battle in the war for Scottish Independence was won.

On the north side of Loch Trool rests an impressive granite boulder known as Bruce's Stone. A famous historic monument commemorating Robert the Bruce's victory over the English in April 1307. Bruce is said to have commanded the Battle of Glentrool from this panoramic vantage point. English soldiers in single file, heading along the far side of the loch on a narrow path (now part of the Southern Upland Way), were bombarded with a volley of boulders dislodged by Bruce's men who were concealed in the crags high above the *''Steps of Trool"*. Many of the English who survived the onslaught fled straight into Bruce's ambush at the head of the loch where their remains lie buried in *"Englishmen's Holm"*.

History tells us that Bruce spent much of 1307 and 1308 hiding out in the local hills. The Battle of Raploch Moor, his flight up the Gairland burn to escape pursuing bloodhounds and his encounter with the *"Auld wife of Craigencallie"* whose sons he recruited to his cause are legendary events that occurred within a few miles of Loch Trool.

Bruce's Stone which was unveiled on 5th June 1929 to commemorate the six hundredth anniversary of his death carries the inscription.

''In loyal remembrance of Robert the Bruce, King of Scots, whose victory in this glen over an English force in March 1307, opened the campaign of independence which he brought to a decisive close at Bannockburn on 24 June 1314.''

It will soon be 700 years since the death of Robert the Bruce. Without the victory at Glentrool his independence campaign would have ended before it got properly started and Scotland would not have spent the following four hundred years as an independent country. Bruce's Stone marks the spot where the dream of a Scottish nation was born.

A palpable feeling of Scotland's formative history remains very much alive here. Historic Scotland describes it as a *"unique place"* and a *"precious resource"*. We consider that the

intrusive proximity of large wind turbines at Glenvernoch would devastate the perception and ambience of this outstanding historical setting.

The centenary of the unveiling of Bruce's Stone, on the 5th of June 2029, the sepcenterary of the death of Robert the Bruce will be a culturally significant event. CVCC maintain that it should not be overwhelmed by the sight of the Glenvernoch Windfarm dominating the view out from Loch Trool.

Bruce's stone marks the spot where the dream of an independent Scottish nation was born. Devaluing and demeaning its setting with industrial wind turbines is an affront to our culture. As such CVCC object to the Glenvernoch Wind Farm.

The Deils Dyke

When considering the Deils Dyke the Applicant states in Cultural Heritage and Archaeology Technical Appendix 7.1: 4.20 *"The feature is tentatively dated from the Iron Age to the 19th century by the HER. Nominally, this boundary ditch forms part of the wider 'Deil's Dyke''* which was apparently a great linear earthwork, *"extending across south-western Scotland from Loch Ryan to the Solway coast near Annan."* This supposed feature is almost certainly a 19th-century construct, which has amalgamated a series of separate and unrelated features into a non-existent, continuous boundary feature. Despite this, the misconception of this as a long-distance, regional feature appears to persist, and it is noted that, in their scoping response, the Cree Valley Community Council reference the Deil's Dyke as *"a rampart constructed by the Novantae to demarcate their territory in the period after Roman influence ended in Galloway."* This is notably not an opinion shared by the Archaeologist for Dumfries and Galloway, who considers the wider boundary feature to be a 19th century fiction (A. Nicholson, Dumfries and Galloway LPA Archaeologist, pers. comm. 29th August 2024).

CVCC believe that the Deil's Dyke was a rampart constructed by the Novantae to demarcate their territory in the period after Roman influence ended in Galloway. All of the available evidence points to this being the case. We do not know whether or not the Deil's Dyke was continuous, nor do we think that it was a ditch. Just as modern countries fortify their borders with strength where they are most vulnerable to an attack, we believe that the Novantae built stouter defences in the places where they were most likely to be attacked such as the Cree Valley. Much of the land to the west and east of the Cree valley is too boggy or too mountainous to be crossed with ease. The Novantae had no need to build a defensive line across this impassable terrain, nature had already done it for them, so we can easily accept that the idea of the Deil's Dyke being a great linear earthwork could be a 19th Century fiction. However, we believe that the two miles of Deil's Dyke that crosses the Glenvernoch site was part of a coherent system of region wide border defences built by the Novantae to protect themselves from the threat of an attack from the north.

The On-Site Archaeological Evidence

The Deil's Dyke at Glenvernoch as it exists today can be found in two forms, either as a section of ruined drystone dyke often robbed and overgrown; or included as a section in a drystane dyke that is part of a more recent field boundary system. At least three distinct ages of field boundary dykes can be found on the Glenvernoch site. The modern day one which resulted from the land reforms of the early eighteenth century. The medieval one where hay rees and small irregular areas of arable land were fenced off to keep the livestock on the outfield away from crops. There are also traces of earlier boundaries which are overlain by the medieval and modern ones. In attempting to categorise the Deil's Dyke as any of the above it can be seen that it does not fit. It is a complete anomaly. It runs virtually straight for over two miles. It does not follow the topography so it cannot be an ancient property boundary. Modern day boundaries that take their alignment from a map are occasionally straight. There were no accurate maps until the 19th century hence it is not credible that the Dyke was a property boundary. Its alignment does not relate to the quality of the soil or the needs of agriculture in any way. It appears to underly all of the other boundary features and cultivation marks that can be found on the site. The rig and furrow plough marks shown on LIDAR plate are the shape they are because the Deil's Dyke was a barrier that medieval ploughmen could not plough through hence the rig and furrow on the Hill of Ochiltree took the form it did because of the presence of the Deil's Dyke rather than the Dyke being a simple field boundary built to enclose the rig and furrow.

A demarcation line or a military barrier, taking the shortest expedient route from one point to another across the landscape is a likely explanation for a ruined structure such as the Deils Dyke, for which no other likely purpose can be ascertained.

From the archaeological evidence on the Glenvernoch site it can be assumed that, the Deil's Dyke was a defensive line in the form of a drystane and turf dyke running almost straight from the Hill of Ochiltree to the River Cree at Crungie Wood. In our opinion it did not mark the actual northern boundary of Novantae territory, it marked what they considered to be the optimum line for them to stand their ground and fight from if the Cree Valley was attacked from the north. The northern territorial boundary of the Novantae was most likely to have been the long-recognised boundary between Carrick and Galloway that follows the Carrick Burn and the River Cree, two miles north of Glenvernoch.

The Hill of Ochiltree is the best vantage point in the High Cree Valley (the presence of an OS triangulation point confirms this). The view from the Watchtower, that according to the historical record, once stood there, extends to the horizon in both the north and the west. It was and is the perfect site for the lookout post of any tribe seeking to repel the threat of an invasion. It is not difficult to imagine the scene when the early warning is sounded as the enemy appears crossing the mosses and waters to the north. The local Novantae warriors would rush from their farmsteads in the south to get to the hill fort on Glenvernoch Fell or to

man the Deil's Dyke defensive line running down from it to the river Cree. The approaching enemy would be faced by a show of strength from the Novantae on the twin Hills of Ochiltree and Glenvernoch and if they were foolhardy enough to continue their attack the stout defences on the hilltops would force them to flounder eastwards across the many small peat bogs that front the Deil's Dyke. If they attempted to breach the defensive line at any point, they would likely be killed by the Novantae defenders who would be shadowing their every downhill move from the other side of the Dyke. In shying away from direct confrontation, they would be leaving themselves only two alternatives, either turn back or continue being funnelled downhill and, owing to the ingenious alignment of the Deil's Dyke, forced over a forty-foot banking to suffer a horrible death drowning in the Loch of Cree.

The line of the Deil's Dyke was walked on 29th December to confirm the above. It was visible along most of its length. One remarkable feature of it, which does not appear to have been suggested before, is that where it ends at Crungie a knoll appears to have been fortified, presumably to strengthen the rampart as it meets the Cree. (Now a river at this point because a whinstone sill above Penninghame House was breached in 1867 to drain the Loch of Cree.)

Evidence From the Written Historical Record

2nd Century AD - Ptolemy's Map of Scotland drawn from his descriptions shows the River Cree in the territory of the Novantae with a northern border beginning to the north of Rerigorium, (Innermessan, north of Stranraer) heading east to the Nith.

7th Century - The Book of Taliessin, the work of an early Welsh poet confirms that a defensive rampart had existed between modern Cairnryan and Crawick near Sanquhar.

1841 - The History of Galloway, written by William Mackenzie details the events in Galloway at the end of the 4th Century immediately before the Romans finally left Scotland. He describes a great battle where the local Picts (Novantae) who were allied with the Romans fought the Scots who had invaded from Dalriada to the north. The great battle took place on the eastern side of the River Cree and, according to the chroniclers of time, turned the waters of the Cree red with the blood of the many thousands who were slaughtered. The cairns and rounals (roundels of trees) where the bodies were buried can still be seen today between the A75 Newton Stewart bypass and Minnigaff. According to MacKenzie there was no clear victor. The Scots retired north, and the Romans left Scotland never to return. The Novantae were left to defend themselves. Subsequently they built the Deil's Dyke to prevent the Scots from invading again.

19th Century - Despite the personal rivalry between some of them, the historians Joseph Train, Sir Herbert Maxwell, Sir Andrew Agnew, McKerlie, and McKinna all concur by acknowledging the existence of the Picts or Deils Dyke.

1950s - Graham, an Innerleithen historian whose speciality was East Coast Harbours writes two papers dismissing the Deils Dyke as an unrelated assortment of ruined medieval boundary features. It is worth mentioning that the basis of his theory is that when Train had interviewed the hill folk of Dumfrieshire he had heard Deils Dyke instead of Dales Dyke and recorded it at such. Grahams theory being that a Dales dyke was the head dyke of a valley hence the Deils Dyke is a fiction. Grahams theory displays a complete absence of knowledge of the dialect spoken by the native farmers in the north of Wigtownshire and Kirkcudbrightshire. The native dialect of Nithsdale and Annandale may be rooted in the language of Norse settlers hence a hill dyke may well be referred to as a dales dyke in Dumfrieshire. There was no early Norse settlement in the north of Galloway so in the local dialect the hill dyke is the hill merch (march) and a property boundary is referred to as the merch dyke. (the author is certain of this because his antecedents include many generations of hill farmers from Kirkcalla which lies on the supposed line of the Deils Dyke.) Graham made his evidence fit his desire to conclude that the Deils Dyke was a fiction. Perhaps the truth lies somewhere in between what Train and Graham chose to find.

Scottish land-names; their origin and meaning, by Sir Herbert Maxwell, 1894: is most relevant here. On page 99 Maxwell says

"A whole chapter might be written on the use of the Celtie prefix dal and the Teutonie suffix dale. The former is peculiar to Scottish topography, and is quite distinct in meaning from, though of cognate origin with, the latter.

The Gaelic dal means a portion of land, the separate possession of a tribe, family, or individual.

The Saxon dal means a portion or share, but not of land more than anything else, and was not used in the early topography of that people.

The Norse dair is a dale or valley, a piece of land separated from the rest of the country, not by human arrangement, but by hills forming the valley. From a common root come a number of words, all containing the same idea of "cleft" or separation.

English we have received through Anglo-Saxon"deal" (to share out)," dole" (what is dealt), " deal" (as in the phrase "a great deal"), "deal" (a thin board of timber from the division of a tree).

Through the Norse we have received "dale" and "dell."

In Ireland of old the word dal bore the special meaning of a "tribe" - either a community separated from the rest of the people, or occupying land set apart for their use. But it is not now to be found on Irish maps; it has completely disappeared with the tribal system, which is all the more remarkable seeing that nine dals are mentioned in the 'Annals of the Four Masters,' one of which was transplanted to Scotland in the fifth century by Fergus Mór, the son of Ere, when he led his followers to settle in Alban or Caledonia.

By the natives this colony was called after the invaders Airer Gaedhil, in modern Gaelic Earra Gaidheal, the boundary or territory of the Gael, which is now shortly pronounced Argyle; but the colonists themselves named it Dalriada, after their native Dalriada in Antrim-that is, dal righe fhada, land of (Cairbre with) the long arm, or, as some prefer, dal righ fhada, land of the tall king (Cairbre).

In that part of Scotland which lies nearest to Ireland, dal is of common occurrence: twenty-seven names having this prefix have been catalogued in Galloway alone, and nearly every other Scottish county affords instances of it."

Suppose that Graham and Train were both told that it was the Dals Dyke. Maxwells writings indicate that they should both have recognised that the name dal referred to a tribal boundary most likely between the Scots of Dalriada and the Picts of Galloway. Local place names were often anglicised or misspelt on early maps. It would not be surprising if Deil was a misspelling of Dal.

One intriguing thing about the Deils Dyke is that it begins in the west of Wigtownshire at the farm of The Beoch above Innermessan or Reregorium as it was once known. (There is little doubt that a defensive rampart ran up the hill from the sea to defend the city from an attack from the north so designating it as one end of the Deils Dyke is not likely to be wrong). The Dyke then ends in the east of Wigtownshire close to a farm called the The Beoch. It is intriguing that the only two farms in Galloway known as The Beoch are at either end of the border between Wigtownshire and Carrick. It could be speculated The Beoch is a misspelling of The Broch and that the name referred to Brochs that once stood protecting either end of a tribal frontier. (Note that there are remains of thick walls thought to have been from a fortified building behind the present-day farmhouse at The Beoch, Newton Stewart. Note also, that there are very few farms locally that are commonly known as 'The ….' hence it is likely that Beoch is broch, and despite the common assumption, Beoch does not translate as birch wood. It is very unlikely that the two most distinctive birch woods in Wigtownshire once stood at either end of the Deils Dyke.

A Mistaken Assumption

In Appendix 7.1 the Applicant quotes Graham who wrongly quoted Joseph Train as having the Deils Dyke "*running towards Glenvernoch Farm*". It does not run in that direction nor did Train state that it did. What he states is; *"From the Hill of Ochiltree the dyke extends along the farm of Glenvernoch. Immediately above Glendochart, the line is interrupted by a circular stone wall 192 yards in diameter. Evidently a hill fort of large dimensions. In the farm of Knockvill which adjoins Glendochart the dyke runs into the Loch of Cree".*

(The farm of Glendochart has been subsumed by modern day Glenvernoch. Interestingly, the name Glendochart corresponds to the Gaelic glenn dachairt. In English, glen of the two

encampments, which considering the twin summits of Ochiltree and Glenvernoch were likely jointly fortified in early times is an apt name for this place.)

Graham clearly misquoted Train. In consequence, rather than contradict Trains observation, the applicants LIDAR data analysis conclusion in 4.22 which states *"The line of the Scheduled area continues in this direction, picking up a separate curvilinear boundary feature on broadly the same alignment, further to the east, which appears to be related to separate enclosures east of the valley (Plate 1Plate 2)."* can be safely interpreted as confirming Trains observation. The evidence on the ground and from LIDAR data is that there is no Deil's Dyke for the 192 yards where the alignment of it crosses the site of the Glendochart Hill Fort. The Deil's Dyke, as Train states, then resumes its path eastwards towards Knockville. LIDAR data from across the whole Glenvernoch site will confirm this. The Applicant has not provided it.

The Applicant is seeking permission to build two turbines, T12 and T13 on top of the remains of the Deils Dyke. They are also seeking permission to dig a large borrow pit and quarry the rock which lies beneath the remains of a significant length of the Dyke as well as bulldozing roads across it and digging cable tracks through it. It is not important whether Joseph Trains writings on the Deils Dyke constitute an important 19th Century discovery or whether the Applicants are correct to suggest that the Deils Dyke is probably a myth. What is important is that there is evidence on the ground and in the history books that what the CVCC believe to be a rampart constructed by the Novantae to demarcate their territory in the period after Roman influence ended in Galloway, runs right through the middle of the proposed Glenvernoch wind Farm site. The Applicant cannot be permitted to dismiss and destroy the remains of such an important part of our local heritage.

CVCC believe that the Glenvernoch Wind Farm Application should be refused in order protect and preserve the Deils Dyke.

Scheduled Monuments

White Cairn SM1048, White Cairn SM1049, Drumwhirn Cairn SM1021, Drumfern Cairn SM1019 and The Thieves Standing Stones SM1044.

The wider context and setting of the prehistoric scheduled monuments SM 1048, SM 1021, SM 1044, and to a lesser extent SM 1019 has survived unharmed for thousands of years. Whatever the ritual or astronomical functions these structures once had, their desolate moorland setting must have been integral to it. This setting must be protected from the intrusion of thirteen very large industrial wind turbines. Otherwise, the future opportunities available to visitors to fully experience it and go on to contemplate the ritual significance of four scheduled ancient monuments will be gone.

SM 1029 has already been robbed of its setting and no longer has any visible context. A conifer plantation has enveloped it and hidden it from view. This further emphasises the importance of not permitting the Glenvernoch wind turbines to dominate the landscape and rob the other four important prehistoric scheduled monuments of their integrity.

Setting is important in how scheduled monuments are understood, appreciated and experienced. The GWF should not be consented.

Unscheduled Monuments

If it is built the Glenvernoch Wind Farm, GWF, will dominate the landscape of the Cree Valley to the north of Newton Stewart; the presence of thirteen 200m wind turbines will disrupt the collective setting and context of the many archaeological remains that currently make up an undisturbed comprehensive and coherent living historical record of man's presence in the area. There are numerous ruined farmsteads and long abandoned field systems on and around the GWF site that considered individually may not be archaeologically significant but when considered collectively are highly significant. Together they are a nationally rare, undisturbed geography of over three millennia of historical remains, and as such they have a very high value as they are able to provide the substantial base material necessary for any future academic research studies concerning the evolution of human settlement in Scotland.

The modern-day farms of Glenvernoch, Garchew, and Creebank together with their smaller neighbours form a contiguous area of upland permanent pasture straddling what is known locally as the High Cree. At over 2000 hectares, this is the largest surviving area of farmed landscape of this type in Dumfries and Galloway. All similar large open landscapes have been buried by blanket conifer afforestation in the past 50 years. Distinct traces of at least twenty separate historic farmsteads can easily be discerned in satellite imagery of the High Cree. (The GWF application lists many of these in Technical Appendix 7.1). The outlines of long ruined buildings and field enclosures dot a landscape patterned by the cultivation marks of primitive agriculture. A thorough on-site investigation of this series of archaeological remains would reveal much about their connections to each other and their respective contributions to the history of the High Cree.

The groundworks involved in constructing the GWF would erase much of the undiscovered hidden archaeology on the site. The overbearing presence of a large wind farm complete with turbines, tracks, and quarries would remove all sense of timelessness from the landscape. The Lowland Clearances and the anthropology of the people who left the countryside to work in towns or settle overseas in the seventeenth and eighteenth centuries are currently neglected fields of research. In the future, academics may wish to rectify this. Preserving the High Cree landscape as it appears today is essential in allowing this. The High Cree must be protected from wind farm development at Glenvernoch because in landscape terms it is unique in that,

owing to the large-scale afforestation of southwest Scotland, there no longer remain any alternative suitably large areas of undisturbed dense archaeological remains available to facilitate future historical and anthropological research.

According to PAN 2/ 2011 Planning and Archaeology paragraph 6; *"In determining planning applications that may impact on archaeological features or their setting, planning authorities may on occasion have to balance the importance of the development against the importance of the archaeological features. The weight that should be given to archaeological considerations will depend on several factors including:*

The relative rarity of the archaeological features. The completeness of the feature / whether it is a particularly good example of its type. The historical or cultural association of the feature The value given to it by the local community. The potential value of the feature as an in situ educational or research resource; and the potential value of retaking the feature for tourism or place making''.

Consenting the GWF would involve ignoring all of the above. The application must be rejected.

3.9. Impact on Tourism and Socioeconomics

In their Scoping Response CVCC stated the following:

"Cree Valley Community Council have recently been inundated with expressions of concern from local residents and business owners. Their concern is partly about the size of the turbines planned but it is mainly centred on worries about the proximity of the proposed Glenvernoch Development to Newton Stewart, "The Gateway to the Galloway Hills, the Galloway Forest Park, the UNESCO biosphere area, and the Dark Sky Park. The worry is that Glenvernoch Wind Farm could destroy the current public perception of Glentrool and the High Cree as being a wild and unspoilt scenic area. They are concerned that the consequence of this is that it will adversely affect their quality of life and that the local tourist economy could similarly be adversely impacted."

CVCC emphasise that the above concerns have persisted and accurately reflect the feeling in the local community.

The most recent reliable evidence on the Impacts of Wind Farms on Tourism is to be found in two reports produced for the Scottish and Welsh Governments and published in 2008 and 2014 respectively. They offer valuable insights on how the GWF might affect the Tourism economy in the surrounding area. The insights are quoted below:

''Economic impacts of wind farms on Scottish tourism: 2008 Report commissioned by Glasgow Caledonian University to assess whether government priorities for wind farms in Scotland are likely to have an economic impact on Scottish tourism.

Numerous surveys have established the importance of the Scottish landscape to potential tourists to Scotland. It has also long been realised that many people find that manmade structures such as pylons and wind turbines reduced the attractiveness of a landscape. Reduced quality of an important feature must inevitably reduce demand which will result in either reduced prices or reduced numbers or both. This loss of expenditure will lead to a reduction in economic activity and result in a loss of income and jobs. The question therefore is not whether wind farms have an economic impact but rather what is the likely size of the impact, a far more difficult question to answer.

There is often strong hostility to developments at the planning stage on the grounds of the scenic impact and the knock-on effect on tourism. However, the most sensitive locations do not appear to have been given approval so that where negative impacts on tourism might have been a real outcome there is, in practice, little evidence of a negative effect.

The Intercept Study also investigated attitudes in a broader sense. This found that whilst Pylons were clearly the most objectionable objects, tourists in general disliked wind farms particularly if there were large number of farms within the landscape.

As can be seen from the table, both UK and US Tourists found the pylons the most objectionable of the structures. Wind farms led to a serious decline in value, more marked in the UK than in the US sample. Very surprisingly, when the respondent was unaware that a farm had been extended, the drop in value of the extension was relatively small, as seen in Table 14.4. The consistency of this result coupled with the dislike of a large number of farms suggests that a policy of concentrating developments and making these large would be preferable to a large number of smaller farms scattered over a wide area.

That a substantial number (17%) claimed that they were less likely to visit if more wind farms are built. That this was less marked amongst the young.

In our view a substantial proportion of the 17% are registering what might be termed a protest vote. They do not like the impact of wind farms on the scenery (like the majority of respondents) and indicate that position in the only way they can, by identifying withdrawal.

The evidence is overwhelming that wind farms reduce the value of the scenery (although not as significantly as pylons). The evidence from the Internet Survey suggests that a few very large farms concentrated in an area might have less impact on the Tourist Industry than a large number of small farms scattered throughout Scotland. However, the evidence, not only in this research but also in research by Moran commissioned by the Scottish Government, is that Landscape has a measurable value that is reduced by the introduction of a wind farm.''

The 2014 REGENERSIS REPORT for Gov. Wales:

"Study into the Potential Economic Impact of Wind Farms and Associated Grid Infrastructure on the Welsh Tourism Sector 2014"

Large area assessments highlight evidence of localised displacement of tourism activity.

5.31 Some of the larger area assessments have concluded that amongst the minority of tourists who would change their visiting behaviour as a result of a wind farm development, a sizeable proportion would still visit the region / wider area. As a result, these visits are not lost – merely displaced to elsewhere within the study impact area.

5.32 For example, the GCU study finds that the tourists whose visiting behaviour is more likely to be affected by the presence of a wind farm would not be lost to Scotland, rather they would switch to other destinations within Scotland and often within a relatively local area. The existence of a substitution effect is echoed in the research carried out in Cape Cod in the USA by Lilley et al. (2010) which finds a substitution effect where some people will move from one beach to another within a similar local area if a wind farm is built so the loss associated with the small proportion of visitors who do change their behaviour is lessened.

5.33 The tendency for larger area studies to factor in these substitution effects to their assessments means that the overall net effects on tourism that these studies calculate tend to be lower than more locally focused assessments. The most robust and up to date large area study is the 2008 study carried

out by GCU. This found that, on balance, there will be little impact on the overall volume and value of tourism activity across Scotland as a result of wind farm development.

5.34 While very useful at the large area level, these studies would underestimate impacts at a more local level and therefore cannot be used to inform a bottom-up assessment.

Factors Associated with a Greater Sensitivity of Visitor Economies to Wind Farm Development

Characteristics of Tourists

The diversity of the visitors, in particular the representation of groups which might be more (eg older visitors) or less sensitive to wind farms (eg overseas visitors or visiting for adventure activities)

Linked to the diversity of the visitor offer. This recognises that different types of visitors may be more or less sensitive to wind farm development (although some will be largely indifferent).

Loyalty of visitors, in terms of their commitment to an area and repeat visiting behaviour

Regular visitors to an area may be more sensitive to changes in the natural environment if they feel ownership of the area.

Characteristics of Development

Scale of development (especially larger scale wind farms with more than 10 turbines)

The scale of development is strongly linked to the potential for physical presence and visibility within the landscape (although the nature of the topography will also be a factor)

Extent to which wind farms feature on or in close to high quality landscapes

The quality of landscapes are affected by various factors including land based uses and existing or previous development. The impact of wind farms will vary depending upon their siting within the landscape and visibility.

Characteristics of Tourism Area

Extent to which high quality (and previously undeveloped) landscapes are a key feature of the visitor offer

High quality landscapes which are a key aspect of the visitor appeal, may be more sensitive to development.

Diversity of the tourism offer

The greater the diversity of the visitor offer the wider the range of visitors and less the potential sensitivity of the tourism sector to wind farm development''

The GWFA relies on the following report prepared for EK by BiGGAR Economics;

The Glenvernoch Wind Farm Tourism Impact Assessment

This is an unreliable document that relies on an earlier flawed report:

BiGGAR Economics Report: Wind Farm and Tourism Trends in Scotland (2021).

CVCC submit that the minutes of the RES Blair Hill Wind Farm Community Liaison Group meeting of 27th August 2024 prove that BiGGAR report is not a credible document and offers no value.

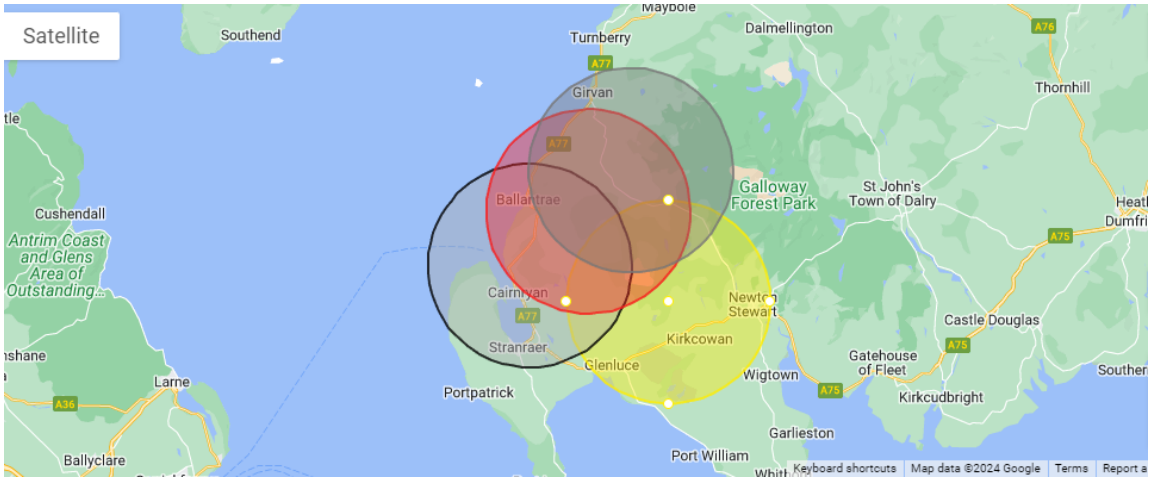
The CLG minutes state:

"Simon Cleary, SC, from BiGGAR Economics gave a presentation. Following the presentation. IS raised concerns about the figures given for the Arecleoch wind farm in the BiGGAR Economics Report: Wind Farm and Tourism Trends in Scotland (2021). He highlighted that a local student had produced a report containing Venn diagrams which had been submitted to a previous CLG meeting. SC acknowledged that there was an error in the Arecleoch figures given in the BIGGAR Economics Report. He said that the ONS data for the postcode of the Local Authority Headquarters, Ayr, had been used in error and thanked members for spotting the error. He explained that the error would be rectified and an updated report would be issued, although not in time for the Blair Hill application. JH confirmed with SC that the report had not been peer reviewed and noted that this error might have been spotted if it had. JH and IS added that the ONS urges caution in the use of potentially inaccurate data extrapolated from its own estimated figures. SC clarified that as it was not an academic research piece, a peer review is not typically undertaken. JH raised his concern that the error identified cast doubt on the validity of the Biggar report and that there may be further errors in the report. JH asked that the ECU be made aware of the error. SC confirmed that the conclusions of the BIGGAR report would not change with the correct figures included and that the ECU would be made aware. It would not change any conclusions of the assessment relating to Blair Hill

Wind Farms & Tourism Trends in Scotland: Evidence from 44 Wind Farms
From Biggar Economics Published: 2021

On the first page in the final paragraph, it states that ''study areas were based on a 15km radius''. This implies to me that in a 15km radius around each wind farm area is where the tourism employment data was collected from.

In tables 5-1 and 6-1 on pages 17 and 22 respectively there are 4 pertinent rows in the tables which are important to this information. In table 5-1 these rows are Airies Farm and Glen App and for table 6-1 these rows are Mark Hill and Arecleoch. The 15km radiuses of these windfarms are show below



- Black circle – Glen App
- Red circle – Arecleoch
- Gray circle – Mark hill
- Yellow circle – Airies Farm

In this study the information shows that in the surrounding area of each of these wind farms the tourism employment is as follows:

Wind Farm Area	Tourism Employment 2015	Tourism Employment 2019	Change from 2015-2019
Glen App	670	655	-2.2%
Airies Farm	375	405	8.0%
Mark Hill	110	230	109.1%
Arecleoch	2525	2125	-15.8%

From this data we can see that for both in 2015 and 2019 the sum of the tourism employment in Glen App, Airies Farm and Mark Hill is less than that of Arecleoch.
The study states the sum of Glen App, Airies Farm and Mark Hill for 2015 is 1155 and the sum for 2019 is 1290.
These figures are collectively both less than the 2525 and 2125 stated for Arecleoch. This is where we run into an issue as can be seen from the map above. Here we see that the zones for data collection for Airies Farm, Mark Hill and Glen App all overlap the zone for Arecleoch. This suggests that the sum of the tourism employment in Airies Farm, Mark Hill and Glen App should be greater or equal to that of Arecleoch but this isn't what we see.
This suggests that the method for data collection must have some flaws leading to these skewed numbers which could suggest that the study may be flawed all together.

The Glenvernoch Wind Farm Tourism Impact Assessment, the GTIA, was obviously a laptop exercise that didn't involve any actual research in the Cree Valley area. It concludes with the absurd statement

"Furthermore, the most common attribute highlighted by accommodation providers in Newton Stewart was their town centre location, proximity to local facilities and ease of access to the surrounding area. These attributes will not be affected by the proposed development implying that any potential effects on visitor behaviour would be restricted to the local area around Newton Stewart rather than the town itself"

CVCC do not consider that a market town, such as Newton Stewart with a population of 4200 people, can ever be legitimately thought of as being economically separate from the surrounding area on which its presence has always depended.

The GTIA lists the top visitor attractions in Dumfries and Galloway without including Drumlanrig Castle, one of Scotland's top tourist attractions. The list has The Old Blacksmiths Shop in Gretna as the region's top attraction. Gretna is 80 miles from Glenvernoch. The second most popular tourist attraction, (assuming Drumlanrig Castle has fewer visitors) is the Galloway Forest Park which lies only 200 metres from Glenvernoch. According to the GTIA, the Galloway Forest Park had 385000 visitors in 2019.

The GTIA states that, *"the most popular attractions and activities for visitors to Dumfries and Galloway include shopping (47%), a country park or garden (44%), a castle or fort (35%), a historic house, palace, stately home (33%), and a museum or art gallery (29%)."*

Newton Stewart's shopping offer does not suggest that the main attraction for visitors is the shopping itself. There are no castles, forts, historic houses, stately homes, art galleries or palaces in the local council ward, MGWW. There are several small museums but none that would claim to attract a large number of visitors. There is one garden, Glenwhan, but no country parks unless the Galloway Forest Park, the Dark Sky Park, and the UNESCO Biosphere are considered to be country parks. The only conclusion that can be drawn from this is that the high-quality landscape in and around the Galloway Forest Park and its associated UNESCO Biosphere, Dark Sky Park, Regional Scenic Area and Merrick Wild Land Area is the significant attraction that draws visitors to the MGWW area.

There is no apparent diversity in the tourist offer in MGWW. High quality and previously undeveloped landscape are the basis that the tourist appeal of MGWW is founded on. The GWF is a large highly visible wind farm development proposal which will have a strong physical landscape presence owing to the topography of the site. It will dominate the Cree Valley landscape and reduce the quality of landscape experience within the Merrick Wild Land Area, the UNESCO Biosphere, the Galloway Forest Park, and the Regional Scenic Area.

The REGENERSIS Report quoted earlier states that:

"The greater the diversity of the visitor offer the wider the range of visitors the less the potential sensitivity of the tourism sector to wind farm development."

All of the available evidence emphasises that the MGWW tourism sector has a limited diversity of offer. Tourism here depends on the scenic landscape of the Cree Valley, that includes a major part of the Galloway Forest Park. It appeals to the type of visitor who values landscape quality very highly. In consequence the Cree Valley area must be highly sensitive to wind farm development.

The Galloway Forest Park website highlights Bruce's Stone and the Glentrool Visitor Centre as two of its major attractions.

The web page for Bruce's Stone describes the visitor offer:

> *"Short walk to one of Scotland's most beautiful views"*
>
> *From the car park, it's just a short easy stroll to Bruce's Stone, which stands on a wonderful vantage point overlooking the shimmering waters of the loch to the rolling hills beyond. It commemorates Robert the Bruce, King of Scotland, and the Battle of Trool in 1307.*
>
> *It's hard to imagine, looking at this peaceful landscape, that such a bitter battle took place here 700 years ago. From the site of the stone you would have seen the drama unfold, as English soldiers were ambushed as they walked along the far shore of Loch Trool. A bugle was sounded as the soldiers approach the Steps of Trool and Bruce's men released a volley of stones onto the surprised troops. Those who turned to flee met heavily armed men behind them. Victory was swift and bloody. Robert the Bruce went on to win the Battle of Bannockburn near Stirling in 1314, securing independence for Scotland"*
>
> ***Activities***
>
> ***Merrick Hill Walk***
>
> *The mighty Merrick, the highest mountain in the Southern Uplands, stands guard over Loch Trool. The views from the summit are stunning, but this is a serious hill route for well-prepared walkers. The summit is at 2,766 feet and is a round trip of 8 miles. The route is not waymarked, so you need to take a map and compass with you.*
>
> ***Cycling***
>
> *National Cycle Route 7 follows the road along the north shores of Loch Trool and links Glentrool Visitor Centre with the other two visitor centres in the Forest Park. While you might pass the occasional car to the west, head east from Bruce's Stone Car Park for quiet, traffic-free cycling.*

The Southern Upland Way

The Southern Upland Way runs along the south shore of Loch Trool. This is Britain's first official coast to coast long distance footpath, running 212 miles from Portpatrick on the Dumfries & Galloway coast to Cockburnspath on the North Sea between Edinburgh and Berwick on Tweed. It's a dramatic and challenging route through the rolling hills of the Southern Uplands. Sample a scenic stretch from Glentrool to Loch Trool and see if you're inspired to walk the rest.

Stargazing

Because it's so dark, the Forest Park is one of the best places in the world to enjoy the stars – which is why it has been designated a Dark Sky Park. On a clear night the stars are so bright that you don't need a telescope or even binoculars to enjoy them.

In describing the visitor experience at Bruces Stone the GWFA asserts that:

"views of the surrounding countryside are likely to be part of the visitor experience, one of the pictures featured on the visitor page about the attraction on the Forest and Land Scotland website appears to show a group of wind turbines in the distance. This suggests that views of turbines are already part of the visitor experience at this attraction. For these reasons there is no reason to expect the behaviour of visitors to this site to change because of the proposed development"

The author had to double check the pictures and yes, this keen-eyed observation is correct. The wind turbines of Airies Windfarm, over 20 km away can be seen on the skyline above the GWFA site. The fact that the presence of small distant turbines caused a visual impact worthy of a mention serves to emphasise that building bigger wind turbines 10km closer to Bruce's Stone would have a significant visual impact on one of Scotland's best views.

The web page for the Glentrool Visitor Centre describes several walking and mountain bike trails that start at the centre. These listed include The Green Torr and The Big Country routes.

The Green Torr

Grade – Blue: Moderate

5 ½ miles/9km

The Green Torr climbs gradually up through the forest to stunning views over Loch Trool. This ride mainly features purpose built singletrack, and the lack of large rocks and tree roots make it welcoming to less experienced mountain bikers. The most challenging section is the steady 218 metre climb through forest to the Green Torr, after which you can enjoy the long final descent back down to the Glentrool Visitor hub.

The Big Country Route

36 miles/58.0 km.

Take a day long ride into the wild heart of Galloway Forest Park with magnificent views of the nearby lochs and hills. Embark on an epic journey that encompasses staggering views of Galloway's lochs and hills. This route takes you along minor public and forest roads, and while there's no technical singletrack, the Big Country route still offers a challenging ride with long climbs and sharp descents.

In their scoping response CVCC requested that the GWFA included a visualisation of the view from the visitor centre car park as: "The Glentrool Visitor Centre Carpark is the busiest place in the Glentrool area. The visitor centre is one of the 7stanes. It is the start point for several scenic, world renowned mountain bike trails. It is also the start point for half a dozen colour graded forest paths and the site of the busy tearoom/ visitor centre. Hill walkers en route to climb the Merrick, tourists on their way to visit Bruce's Stone, and cyclists on National Cycle Route 7 must pass by and often stop here."

EK declined to provide one, CVCC have included one in GAV; VP C. The wireline drawing created for VP C shows that both Glenvernoch and the pre application Blair Hill windfarms will theoretically be highly visible from here. There is currently woodland all around the visitor centre and the forest trails which start here. Depending on when and where the surrounding conifer trees are clear felled the two proposed wind farms will actually be highly visible for periods of years along particular elevated sections of the various forest trails that start here. The Big Country Mountain bike route climbs steeply near the Visitor Centre as does the Green Torr route. Both will suffer close up views of the GWF if it is built.

The visualisation for VP C shows the GWF amongst the top of the scrub across the road from the car park. Were the scrub to be cleared or were the turbines to be spinning and reflecting light the GWF would be highly visible to any travelling receptor in the surrounds of the Glentrool Visitor Centre. GWFA Figure 6.72 Lit Turbine ZTV up to 20km indicates that 6 red lights would be flashing from 6km away through the top of the scrub at any stargazers who were parked up at the Glentrool Visitor Centre trying to experience the darkness of the Dark Sky Park.

Local Economic Impact

Having considered the evidence, CVCC believe that the tourism sector of the local economy would suffer if the GWF were to be built. The economic impact of this cannot be known for certain because it is dependent on how many visitors would be repelled by the GWF. Many local self-employed people earn a large percentage of their income as contractors engaged in building, maintaining, and servicing tourist accommodation. They don't show up in any ONS

tourism related dataset. None of the local plumbers, builders, gardeners, and handymen are classified as being involved in the tourism sector, but they are. BiGGAR Economics missed out a lot of the tourist accommodation that is available in the local area in preparing their assessment. Conifers Leisure Park and Penninghame House, (identified in the GWFA as the open prison which closed over 20 years ago) being two obvious examples. There are hundreds of self-catering properties available to rent in MGWW. The majority of them being individual additional sources of income for local families who usually do the work involved themselves. Again, they are not included in the official statistics provided by the ONS.

It is accepted as fact that confidence is the biggest factor in all investment decisions. Without having confidence that a successful outcome can be achieved no one will invest. This is the issue with the dark shadow that the GWFA has cast over the local tourist economy. Most of the local community believe that the GWF will be bad for tourism. No one can be absolutely certain of this, but it is the common perception particularly among those involved in the industry. The local scenery is what draws visitors to the area, it will be tarnished by the GWF. Fewer people will want to come, and anyone involved in providing accommodation or facilities for tourists will lose income.

Some planned investment in tourist accommodation has already been cancelled or postponed since the news of the Glenvernoch and Blair Hill wind farm proposals first arrived. The confidence in the future of local tourism that resulted from the outdoor recreation boom following lockdown has been shattered. People are now reluctant to invest in tourism related projects. The renovation of properties, the construction of holiday lets and glamping pods, the start-up of a catering business, or starting your own outdoor activity business are all employment creating activities which require investment. Investment which will not happen without someone having the confidence to do it.

The GWFA must not be approved.

3.10. Loss of Important Habitat

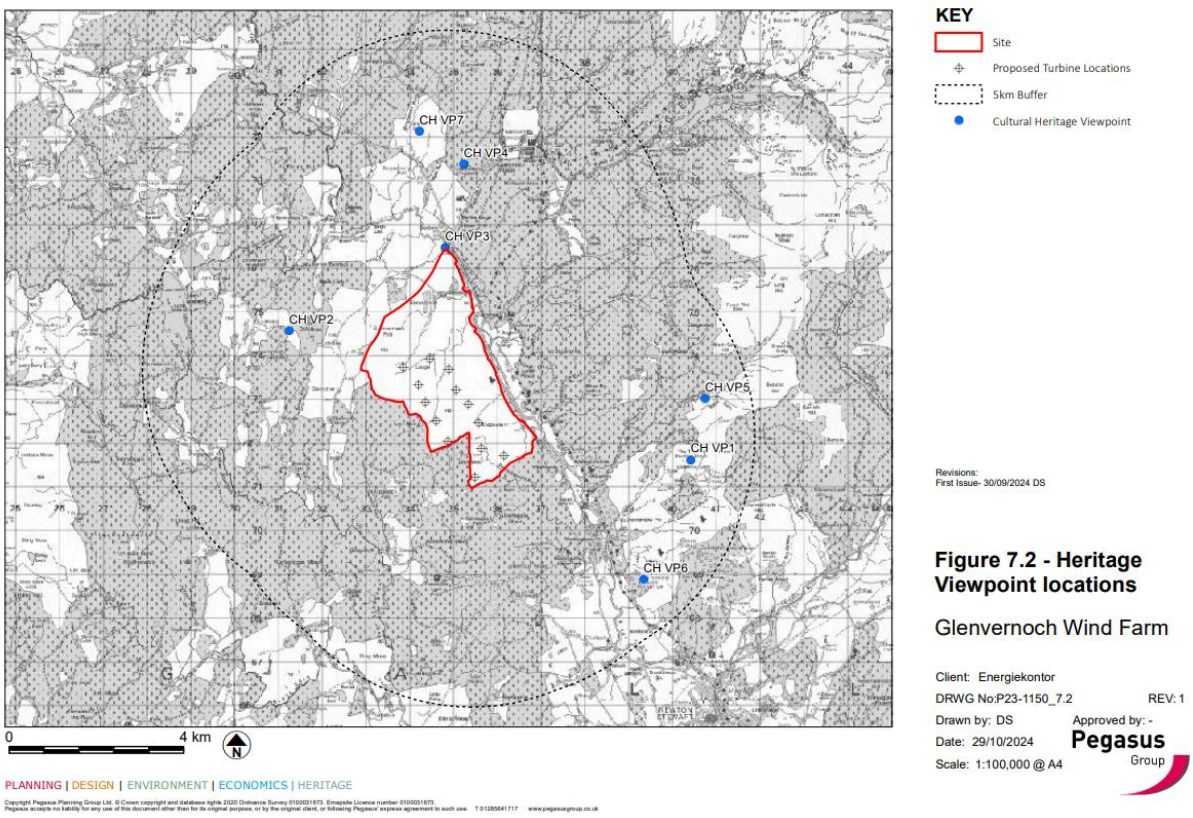


Figure 3 – GWFA Figure 7.2 – Heritage Viewpoint Locations

CVCC are concerned that the GWFA will significantly reduce the area of species rich open grazed natural habitat in the Cree Valley. This is illustrated in GWFA Figure 7.2: Heritage Viewpoint locations. The GWFA did not produce Figure 7.2 to illustrate this, but it is useful here because it shows the sheer scale of the coniferous afforestation that now exists around Glenvernoch. The dappled grey area on the map is wooded, almost all of it is commercial conifer plantation with the exception of the Wood of Cree and several other small areas of native or deciduous woodland. The unshaded areas are predominantly open farmland. Until the 1940s, the 350 square kilometres of land surrounding Glenvernoch and lying to the north of Newton Stewart, to the south of Barrhill, and extending from Lamachan in the east to Kilgallioch in the west, was virtually all open farmland. The map in Figure 7.2 does not cover this entire area, but it illustrates the vast extent of the conifer plantations that have since replaced the majority of the species rich acidic grasslands, rush pastures, mires and moorlands and associated small areas of improved productive pasture in fields close by farm steadings.

Today, over 80% of what was once grazing land has been replaced by a virtual monoculture of Sitka Spruce. Once it takes root Sitka Spruce grows quickly and shades out all of the plants growing around it, and after that, the acidity of the needles it sheds prevents any other plant

from growing. The habitat of the Sitka Spruce forests which surround Glenvernoch is a plant monoculture. It lacks the diversity of plant species necessary to support the diversity of invertebrates and insects that bird and animal communities require for them to thrive.

The remaining open land in the area remains, mostly as it was. A small part of it is improved pasture. The majority remains extensively grazed species rich grassland and mires; interspersed between areas of moorland and blanket bog.

Glenvernoch, Creebank, and Garchew together with their smaller neighbours extend to form a contiguous area of the habitat described above. It is shown as the central area of Figure 7.2 where it can be seen that it is the only significant area of forest free land, below the tree line, to the north of Newton Stewart. At 2000ha, it appears to be a sizeable area of open natural habitat. It is, but unfortunately, it is all that has survived of what was, until less than a hundred years ago, a continuous open habitat 10 times the size it now is.

If the GWF is built; the 6 miles of unsurfaced roads, the 15ha of concrete and hard standings around the turbine bases, the quarries, the watercourse realignments, and the 10ha vegetation clearance zone around all thirteen turbines will not add up to significant area being lost when compared to an overall area of 2000ha. However, it is not the area lost; it is the amount, rarity and value of habitat that will be lost that is of concern. The size of habitat taken up by the GWF will be more than the 500 ha that it occupies on the map because it involves the introduction of very large wind turbines into an area that has become the only extensive open area of rich upland habitat in MGWW that currently remains wind turbine free.

Insects, reptiles and other animals occupying ground-based habitats may adapt to new structures appearing, if they are not destroyed or disturbed by construction-based activity. Birds often fly for miles between their roosting sites and feeding areas. They can nest anywhere they find the conditions to be right. The GWF will be noisy, it will create turbulence and introduce massive fast flailing movement over a large area of sky. As such resident bird populations that are susceptible to the threat faced from turbine blade rotation are likely to be significantly affected if the GWF is built.

The GWFA site is within a few hundred metres of a substantial area of native woodland which includes the RSPB Wood of Cree Reserve and Oak Woods SSSI. Many of the bird species which nest there venture out onto the open habitat of Glenvernoch to feed.

The wind turbines will be a risk to them.

The species rich extensively grazed habitat of the GWF is particularly suited to ground nesting bird species such as lapwing, curlew, plover and snipe. Should the GWF be built and a breeding pair of any of these species choose to nest nearby then one unlucky flight through one of the thirteen collision risk windows, as defined in the GWFIA, and the breeding pair that was, will be no longer.

The GWFA Ornithological Survey lists only a few pairs of the above species as frequenting the Glenvernoch site. It is most important for the conservation of these rare species that the open habitat of Glenvernoch is protected from incursion by wind turbines

An extensive open habitat is the perfect hunting ground for raptors. Peregrines and red kites are not unusual in the area. Barn owls tend to fly closer to the ground at collision risk window level while hunting for voles and other small mammals. It is obvious that the GWFA is a threat to raptors that make use the open landscape on and nearby Glenvernoch as a hunting territory.

Raptors are rare and need protecting. We believe that building a hazard such as the Glenvernoch windfarm on their hunting range is a genuine threat to them

The barnacle and pink footed geese who winter in Wigtown Bay are the harbingers of spring to the residents of the Cree Valley. Every April when they sense the better weather coming the geese take to the sky dozens at a time, flying north in chevrons using the River Cree to guide them. They never stray far from the river or reach a great height as they head up the valley. If the GWF is consented, it will be a huge danger to them. If the squadron leader is careless the whole chevron could fly straight into a wind turbine with catastrophic consequences.

The GWF site is currently frequented by bats. The vibrations, high frequency sounds, and air turbulence created by wind turbines are an obvious physical threat to them but are probably more likely to scare them away from their feeding grounds.

CVCC consider that it is vitally important to keep Glenvernoch turbine free in order to preserve the only surviving large tract of species rich open grazed natural habitat available in the area. Without suitable habitat being available the populations of currently rare bird and animal species do not have any scope to recover.

The GWFA must not be permitted.

3.11. Galloway Dark Sky Park and Night-time Lighting

If it is built the GWF will be less than 1km from the internationally recognised Galloway Dark Sky Park.

The GWF will have six high intensity red aviation warning lights on six separate turbines to indicate its extent to any passing aircraft. Figure 6.7.3: Lighting Intensity ZTV to 20km shows that all six of these lights will be highly visible in all westerly aspects from within the Dark Sky Park near Glentrool. In consequence, anyone who is attempting to view the western sky at night from inside the Dark Sky will be frustrated by the GWF.

The GWFA includes EIAR Volume III – Technical Appendix 6.7: Assessment of Night-time Lighting. This document in a description of the methodology it employs to assess nighttime lighting includes the following paragraph:

"As the photography was taken in clear weather conditions, when visibility was greater than 5km, the visualisations illustrate the reduced 200cd intensity to reflect the lighting that would arise in those conditions as a result of the mitigation proposed. It is understood that these images nonetheless represent the worst-case situation as should visibility be less than 5km such that the 2000cd lighting was active, then these poor conditions would of themselves be such as to restrict the visibility of the lighting to no more than that of the 200 candela lighting seen in clear conditions."

The accepted industry standard is to produce visualisations assuming "a worst-case scenario" with the 2000cd lighting active. Weather and visibility can vary from one minute to the next and from one viewpoint to the next even if they are in close proximity. Atmospheric visibility monitoring can only provide information from one specific place at one specific time. It cannot be relied upon to provide enough information to allow the GWF aviation lighting to always respond as described in the GWFA. The worst-case scenario for the GWF should assume the brightness of the lights to be 2000cd.

The GWFA only includes night-time visualisations for 200 cd at VP 2, VP 3, and VP 7. This is an inadequate suite to properly demonstrate the night-time visual effects that the GWF will give rise to.

Viewpoint 2: A714, north of Bargrennan is a useful location

Viewpoint 3: A714, junction with minor road to Glentrool is very close to woodland completely obscuring the view of the site. It is not a useful location

Viewpoint 7: B7027/Southern Upland Way, near Knowe is on a long-distance footpath and, as stated in the GWFA, *"unlikely to be visited after daylight hours."* It is not a useful location.

- An adequate suite of night-time visualisations would assume a lighting intensity of 2000 candela and include those seen from VP 1, VP 2, VP 9, VP 12, VP 19, and VP 20.

A comprehensive suite would also include visualisations produced for the six viewpoints that are used in GAV. It should be noted that VP 1, Hill of Ochiltree, and VP 12, the Merrick summit are two popular locations for viewing the night sky. Hill of Ochiltree, because it is a short distance from the roadside, 20 minutes from Newton Stewart and can be got to quickly when stargazing conditions are good. The Merrick summit, since camping there overnight to experience the sunrise, is popular with young people, and tarrying awhile there to watch the sunset when the weather is good, is not an uncommon thing for older hill walkers to do.

Technical Appendix 6.7 is unsatisfactory. EK should be asked to provide a proper assessment as described above.

CVCC believe that the magnitude of the intensity of the nighttime aviation lighting proposed in the GWFA is a clear threat to the darkness of the Dark Sky Park and that the visitor experience it currently gives will suffer a significant negative impact if the GWF were ever to be built.

The GWF should not be consented because it will sit too close to the Galloway Dark Sky Park.

3.12. Conflicting Government Policies

The Galloway National Park

The GWFA site lies is in the heart of the area chosen for the proposed Galloway National Park.

CVCC understand that National Parks are created with two main purposes:

- To conserve and enhance the natural beauty, wildlife and cultural heritage.
- To promote opportunities for the public understanding and enjoyment of the special qualities of the Parks.

There are no meaningful ecological enhancements proposed in the GWFA. The GWF will damage the wildlife, cultural heritage and natural beauty of the surrounding area. We consider that the GWFA proposal is completely at odds with what National Park status is intended to deliver for the area.

There should not be any contradiction in official policy. An area is either naturally beautiful and rich in wildlife and cultural heritage and worthy of National Park and UNESCO Biosphere status. Or it isn't. In official policy terms. It can be either a good place to build a wind farm, or a good place for environmental protection.

3.13. Hydrology and Aquatic Life

CVCC fully endorse the representation made by the River Cree District Salmon Fishery Board and would like it to be considered to be part of our objection.

3.14. Visual Impact on the Main Traffic Routes

The GWFA is largely accurate in its A714 assessment, however there are two major exceptions to this.

A714 NORTHBOUND

North of Newton Stewart the vast majority of vehicles travelling north will have bypassed the section of the A714 that goes through the centre of Newton Stewart. Instead, they will have left the A714 at the roundabout on the southern edge of Newton Stewart and taken the A75 towards Stranraer for less than a mile before heading east along the Barnkirk road for a mile and rejoining the A714 as it heads north. Their visual experience would be subject to a very high magnitude of change between leaving the A75 and reaching Challoch. The visualisation GAV VP D from Barnkirk road indicates that the GWF will be the dominant visual feature on this section of the A714 route. In consequence the visual effects experienced by road users will be significant.

A714 SOUTHBOUND

Receptors travelling on the 3.5 km section from Bargrennan Hill/Marrbury Smokehouse, GAV VP B will be subject to a high magnitude of change. The GWF will be a dominant feature, close up and in full view, and rarely obscured by vegetation along this section of the route.

The GAV visualisations of VP A and VP B illustrate that the GWF will overwhelm this section of the A714. Very significant visual effects will be experienced by road users.

A75

There is actual rather than theoretical visibility from sections of the A75 to the west of Newton Stewart. The visualisation from GAV VP F confirms this. GAV VP E and LVIA VP 17 provide further evidence, as do the ZTVs provided in the GWFA.

To the east of Newton Stewart, on the northbound approach from Creetown (LVIA VP 15) the GWF will appear intermittently, where the alignment of the road is such that the wooded slopes to the right of the road do not obscure it from view.

3.15. Offsite Access Route Barnkirk Road – A714 Junction

CVCC believe that the proposal, outlined in the GWFA, to push a 100m long temporary track through the side of the hill at Linloskin is utterly ridiculous and unnecessary.

We estimate from the drawings provided that this will involve removing 1000 cubic metres of soil and subsoil from the hillside between the entrance to North Barnkirk and the A714. The plan appears to be to gouge a 10 foot deep cutting for over 100m through the hillside and go on to form a hardcore track with a gradient of 8% running onto the A714, passing right out through the existing flower tubs and Welcome to Newton Stewart sign about 80 metres south of the current junction. A traffic island the size of a submarine will be left high and dry between the Barnkirk Road, the new track, and the existing road junction with the A714.

This cannot be permitted. During periods of heavy rainfall water will run down the adjacent field into the cutting, wash sediment and stone from the track down the 8% gradient, onto the A714 and litter the road surface with large stones, gravel and mud to create a very dangerous road traffic hazard.

The muddy water will then run a further 50m and pollute the River Cree

CVCC consider that these proposals are poorly designed, a danger to road safety and environmentally detrimental. We note that Scottish Power Renewables are able to negotiate the existing road junction with oversized lorries carrying 75m turbine blades. We would ask why EK are unable to do the same.

See Appendix 2 for the GWFA proposed A714/Barnkirk Road Juntion offsite access route.

3.16. A75 Off-Site Access Route

CVCC do not consider that EK should be permitted to bulldoze the Marie Curie Field of Hope to enable their oversize turbine transport lorries to negotiate the junction of the A75 and Barnkirk Road next to Newton Stewart Cemetery.

Figure 4 – The Marie Curie Field of Hope, Newton Stewart

See Appendix 3 for the GWFA proposed A75/Barnkirk Road junction offsite access route.

4. Summary of Objection

CVCC consider that the GWFA does not adhere to and contravenes of key aspects of national and local planning policy.

National Planning Policy

NPF4

NPF4 recognises that large scale developments can have significant and 'unacceptable' impacts. We contend that the location, nature and scale of the proposals is such that they will have an overwhelming and overbearing impact on the natural environment and the people of the Cree Valley.

NPF4 - Policy 3

To protect biodiversity loss, deliver positive effects and strengthen nature networks.

The proposed development is contrary to the aims of Policy 3, CVCC have demonstrated that the proposal will lead to the loss of important open habitat. This will undermine the ecological connectivity and biodiversity in the area surrounding the site. The native woodland including the Wood of Cree SSSI, the Wood of Cree RSPB reserve and the neighbouring Barclye Native Woodland Creation Project will suffer impacts particularly with regard to safeguarding bird species.

NPF4 - Policy 4

'*development proposals which by virtue of type, location or scale that will have an unacceptable impact on the natural environment will not be supported*'.

We consider that adverse effects resulting from the proposals would give rise to an unacceptable level of impact on the natural environment and as such they are in contravention of the aims, principals and requirements of Policy 4 Natural Places.

NPF4 - Policy 7

Historic assets and places.

"To protect and enhance historic environment assets and places, and to enable positive change as a catalyst for the regeneration of places."

NPF4 - Policy 7(a)

With regard to Bruces Stone and the Deils Dyke the GWFA project is unacceptably deficient, it fails to assess the visual and physical impacts of the GWF project as stipulated.

NPF4 - Policy 7(h)

"Development proposals affecting scheduled monuments will only be supported where:

i.direct impacts on the scheduled monument are avoided

ii. significant adverse impacts on the integrity of the setting of a scheduled monument are avoided:or

iii.exceptional circumstances have been demonstrated to justify the impact on a scheduled monument and its setting and impacts on the monument or its setting have been minimised."

The GWF will result in significant adverse effects on the integrity of the setting of the scheduled monuments: Bruces Stone LB52395, White Cairn SM1048, Drumwhirn Cairn SM1021, Drumfern Cairn SM1019 and The Thieves Standing Stones SM1044.

NPF4 - Policy 7(j)

"Development proposals affecting nationally important Historic Battlefields will only be supported where they protect and, where appropriate, enhance their cultural significance, key landscape characteristics, physical remains and special qualities."

The GWF will have a significant visual impact on the nationally important site of the Battle of Glentrool. It will alter the landscape and in consequence the timeless undisturbed special quality of the site will be lost.

NPF4 - Policy7(o)

"Non -designated historic environment assets, places and their setting should be protected and preserved in situ wherever feasible. Where there is potential for non-designated buried archaeological remains to exist below a site, developers will provide an evaluation of the archaeological resource at an early stage so that planning authorities can assess impacts. Historic buildings may also have archaeological significance which is not understood and may require assessment."

The GWFA is contrary to Policy7(o). The non-designated historic environment assets as identified and described by the CVCC in this objection are threatened by the GWFA.

NPF4 - Policy 11

The GWFA is contrary to NPF4 Policy 11.

The badly located site is insufficient in scale to accommodate very large turbines this has led to a compromise in the design process which inevitably produced a flawed design.

The poor design of the GWF with its extreme scale in combination with a poor choice of site renders it unable to either comply with NPF4-policy 11 or offer any form of mitigation. GWFA is contrary to Policy 11(e)i, ii, iii, vii, ix, xiii.

NPF4 - Policy 14

"To encourage, promote and facilitate well designed development that makes successful places by taking design-led approach and applying the Place Principle."

With the stated Policy Outcome: "*Quality places, spaces and environments".*

Policy 14 (a)

"*Development proposals will be designed to improve the quality of an area whether in urban or rural locations and regardless of scale"*

The GWFA is contrary to NPF4-Policy 14(a)

NPF4 - Policy 29

Rural Development. This policy requires that development proposals in rural areas should be suitably scaled, sited and designed to be in keeping with the character of the area. It is clear, in our opinion, that the proposals do not adhere to the principal of the policy being inappropriately located, out of scale and character with the surrounding landscape and built form.

Local Planning Policy

The application site is subject to policies set out within Dumfries and Galloway Local Development Plan 2(LDP) The relevant local plan policies are:

Policy OP1 (c) - Landscape: The policy requires that '*Development proposals should respect, protect and/or enhance the region's rich landscape character, and scenic qualities, including features and sites identified for their landscape qualities or wild land character….. They should also reflect the scale and local distinctiveness of the landscape'*. CVCC maintain that the proposed development does not respect, protect and enhance landscape character and scenic quality and consequently can be considered to be in conflict with the aims and principles of Policy OP1.

Policy ED11 concerns the Dark Sky Park and it states that the council will assess proposals on their merit '*where they do not adversely affect the objectives of the dark skies park designation'*. The requirement for the installation of aviation lights will adversely affect the darkness of the night sky in the area and also the perception and quality of experience of visitors to the Dark Sky Park and as such the proposals should not be supported.

Policy NE2 Relates to Regional Scenic Area (RSA) designations and sets out that development within '*or which affects a RSA' may be supported only where the council is satisfied that the landscape character and scenic interest of the area* 'would not be significantly adversely affected by the proposals'. It is clear that the proposals do impact on the western edge of the regional scenic area and would significantly adversely affect the quality and perception of this designation. Consequently, the proposals should not be supported.

Policy NE3 - Areas of Wild Land: This policy states that; '*Development which would affect the Merrick Wild Land Area in Galloway….would not be supported unless the Council is satisfied that it is demonstrated that any significant effects on the qualities of these areas can be substantially overcome by siting, design or other mitigation*. The development is situated where it is highly visible from the Merrick WLA and is prominent in extensive panoramic views that can be gained from the summit. Effects resulting from the proposals will be evident during daylight and particularly at dusk and during the hours of darkness due to the requirement for aviation lighting. As such the special qualities of the designation would, we argue, be compromised by the proposals which can thus be considered to be in contravention of Policy NE3 requirements.

Policy IN2 - Wind Energy: The policy states that The Council will support wind energy proposals that are located, sited and designed appropriately.

It further states that the acceptability of any proposed wind energy development will be assessed against the following considerations: '*Landscape and visual impacts: The extent to which the landscape is capable of accommodating the development without significant detrimental landscape or visual impacts, including effects on wild land'*: The site is located in an area considered to have a high sensitivity to very large typology wind turbine development. The scale of the turbines proposed will directly and indirectly impact on landscape character, scenic quality and visual amenity. We insist that the landscape of the Cree Valley is not capable of accommodating the development without significant detrimental effects. The significant adverse landscape and visual effects resulting from GWF are too high in number to render it acceptable.

Policy IN2 is also concerned with cumulative impact the policy requires consideration of: '*the extent of any cumulative detrimental landscape or visual impact or impacts on existing patterns of development from two or more wind energy developments and the potential for mitigation*. In our opinion the proposed development will give rise to significant additive cumulative effects and is therefor unacceptable.

Policy IN2 also requires that impact on local communities and residential interests should be addressed: '*The extent of any detrimental impact on communities, individual dwellings, residents and local amenity, including assessment of the impacts of noise, shadow flicker, visual dominance and the potential for associated mitigation'*

The proposed GWF will be overbearing and overwhelming in views from nearby properties.

5. Conclusion

Cree Valley Community Council believe that the Glenvernoch Windfarm Application should not receive planning consent.

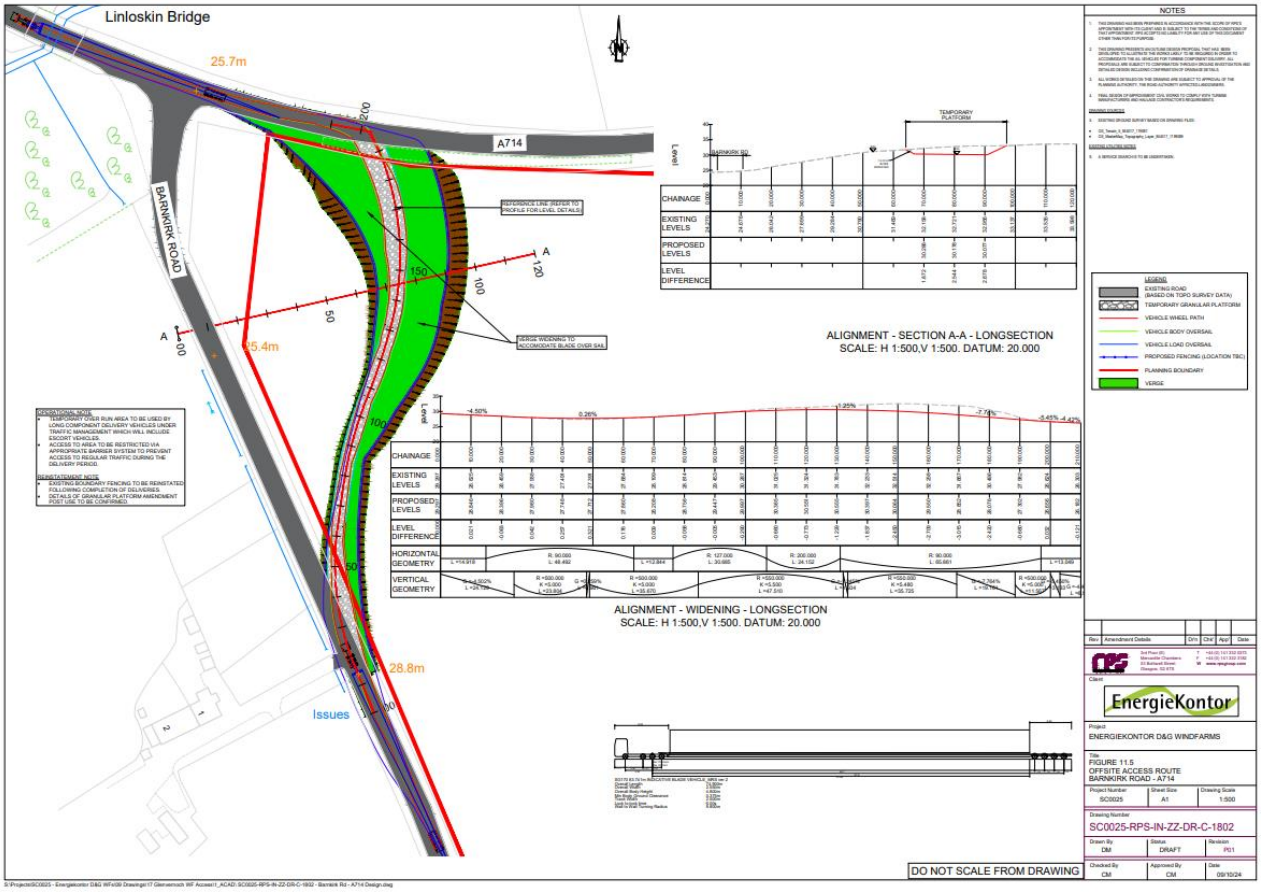
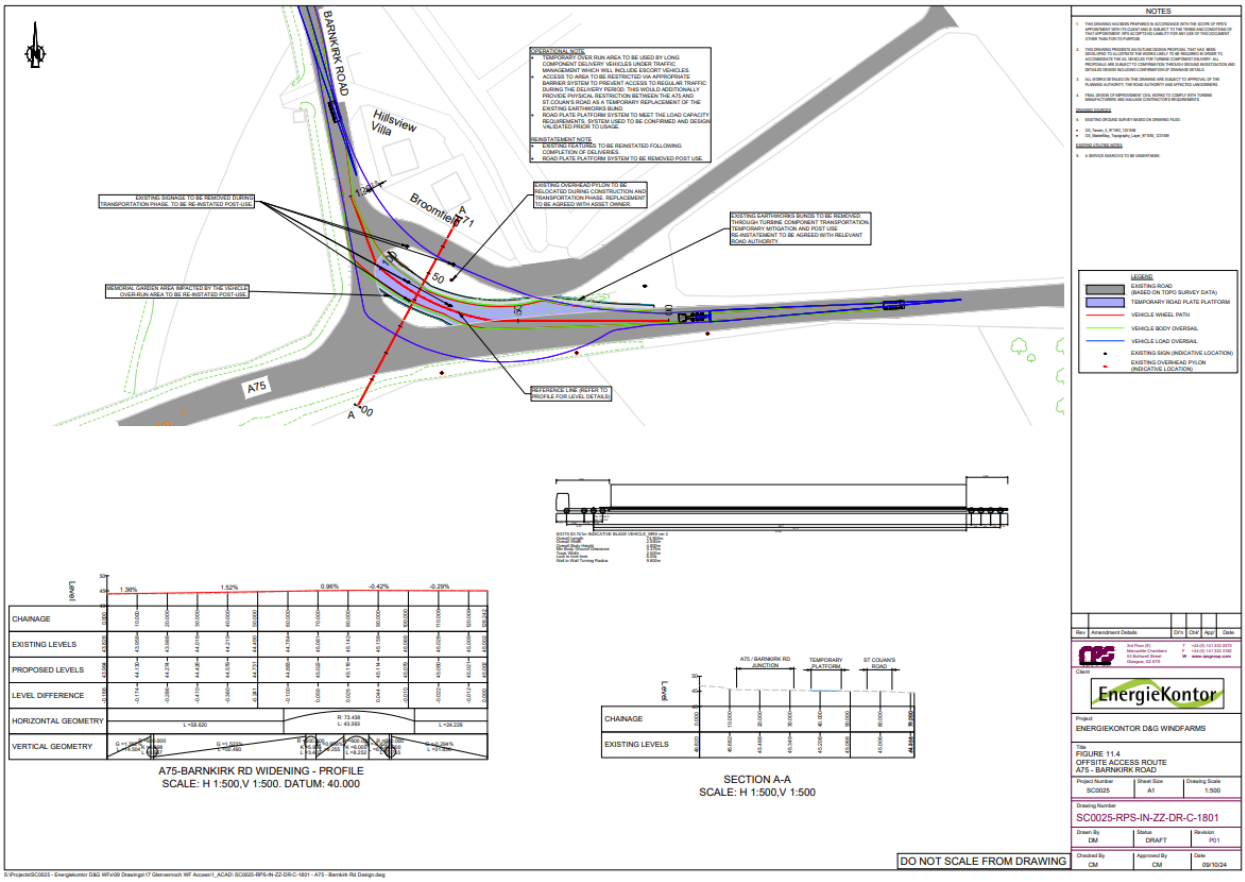
It is badly sited, badly designed and would have an unacceptable impact on the natural environment and people of the Cree Valley.

6. Appendices

17.1 Appendix 1 – Glenvernoch Wind Farm – Additional Visualisations (GAV)

The original file size was too big to send via email. We will send it separately in either of two versions: the high-resolution file, **Appendix 1 HR**, or the smaller sized low-resolution file, **Appendix 1 LR.**

17.2 Appendix 2 – Barnkirk Road/A714 GWFA Proposed Offsite Access Route



17.3 Appendix 3 – A75/Barnkirk Road GWFA Proposed Offsite Access Route