



Copeland Wind Energy Technical Document

Copeland Borough Council

February 2022

Contents

1. Introduction.....	4
2. Background	0
3. Policy Context	0
4. Options Considered.....	4
5. Assessment of evidence base documents	5
6. Identifying constraints	9
7. Area Suitable for Wind Energy.....	13
Appendix 1: Planning applications for wind energy in Copeland between 2011 and 2021	15
Appendix 2: Mapped constraints.....	20
Appendix 3: Details of landscape character areas (Cumbria Landscape Character Guidance)	31
Appendix 4: Consultee responses to previous drafts of the Local Plan relating to wind energy developments	34

Lists of Tables

Table 1: Levels of renewable energy in Copeland between 2014 and 2018

Table 2: Responses to Question CC4 of the Issues and Options paper (November 2019)

Table 3: Potential wind capacity in Copeland

Table 4: Landscape Characteristics and their overall sensitivity and capacity for wind energy development

Table 5: Constraints considered

List of Figures

Figure 1: Areas of wind speed greater than 6.5 metres per second in Copeland

Figure 2: Landscape character classification

Figure 3: Landscape capacity for wind energy development

Figure 4: Sensitivity of landscapes to different scales of vertical infrastructure

Figure 5: Significance of landscape effects to different scales of vertical infrastructure

Figure 6: Landscapes types which have low or low-moderate capacity to accommodate turbine development

Figure 7: Preferred Option for Area Suitable for wind energy development

1. Introduction

- 1.1 The purpose of this document is to address policy and guidance included within the National Planning Policy Framework and Planning Practice Guidance which states that Local Planning Authorities are required to identify an area suitable for wind energy development within the development plan. It replaces and updates the previous Wind Energy Technical Document, produced in September 2020.
- 1.2 It is recognised that the planning system has an important role to play in mitigating the effects of climate change and in ensuring new developments minimise carbon emissions. The Local Plan is particularly important as it will provide the policy framework within which planning decisions are made; part of the development of the Local Plan is the national requirement to identify an area suitable for wind energy development.
- 1.3 This document has been prepared to support Policy CC2PU of the Copeland Borough Council Local Plan (2021-2038), with a specific focus on how the area suitable for wind energy has been identified. It uses evidence base documents to provide a high level assessment of the planning and environmental considerations that could affect areas within Copeland to accommodate wind energy development.
- 1.4 The UK has a requirement to produce 15% of its energy from renewable energy sources by 2020¹. In 2020, it was recorded that 13.6% of the total energy consumption came from renewable energy sources², which although shows an 11 percentage point increase from 2008 levels, it does mean the UK failed to meet the 2020 target of 15%
- 1.5 The proportion of renewable energy generation (43.1%) outstripped fossil fuels for the first time in 2020. Due to reduced demand and disruption linked to Covid-19, the growth in renewable sources of bioenergy and waste, wind, solar and hydro, was offset by reduced fossil fuel (coal, oil and gas) and nuclear output. In 2020, coal production fell to a record low to just 1.8%, with nuclear production also hitting record lows due to prolonged maintenance outages. Favourable wind conditions in 2020 saw an increased generation of offshore and onshore wind energy³.
- 1.6 Locally, there has been a long standing commitment to reducing carbon emissions within Copeland.
- 1.7 In 2008, the Council made a commitment to reduce its own carbon emissions in line with the Climate Change Act and the Cumbria Strategic Partnership's Climate Change Commitment. The Council also signed up to the Nottingham Declaration in 2009 which was a voluntary pledge to address the causes and effects of climate change within the Borough.
- 1.8 More recently, in April 2019 all Cumbrian local authorities and the Lake District National Park Authority formally adopted the Cumbria Joint Public Health Strategy incorporating a

¹ European Directive 2009/28/EC

² Page 43 of the Digest of UK Energy Statistics 2021(

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007132/DUKES_2021_Chapters_1_to_7.pdf)

³ Chapter 6 of Digest of UK Energy Statistics 2021

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007132/DUKES_2021_Chapters_1_to_7.pdf)

pledge for Cumbria to become a carbon neutral county and to mitigate the likely impact of existing climate change.

- 1.9 The Council further committed to reducing carbon by introducing a Carbon Reduction Target of 5% between 2017 and 2020 through its Environmental Policy. This Policy committed the Council to identify and consider the environmental impacts of its day to day activities and decision making as it recognises that “the move to a low carbon economy is the right thing to do”⁴.
- 1.10 The Environmental Policy 2017-2020 was updated in December 2020 to cover the period 2020-2023⁵. The three key objectives of the Policy are: to commit to being a truly sustainable organisation; to take meaningful action to limit the effects of climate change and to protect and enhance the environment; and to continue its journey towards becoming a low carbon Council.
- 1.11 The Council’s Climate Action Plan (2021)⁶ implements the Council’s Climate and Environment Policy by setting out the detailed actions to be taken by the Council to decarbonise its activities and influence the behaviours of those who live in, work in or visit Copeland. There is a 10 point plan of action to do this which aims to embed sustainability into corporate and democratic decision making. Some examples of actions include the development and adoption of a Sustainability Charter, the establishment of a Climate Steering Group and a review of corporate policies.
- 1.12 The Council, along with other key partners, also supports the Copeland People’s Panel on Climate Change. The panel is a Citizen’s Jury with a representative view on behalf of people in Copeland. The Panel has set a number of recommendations to the Council and other organisations on how the borough can achieve net-zero. One of the key recommendations reflects a need to plan for and invest in renewable energy in Copeland. Their recommendations are being built into the Council’s new Sustainability Strategy & Climate Action Plan.

⁴ Copeland Borough Council’s Environmental Policy 2017-2020

(https://copeland.moderngov.co.uk/documents/s4173/Environmental%20Policy%20FINAL-V.02_%20March%202017.pdf)

⁵ Copeland Borough Council’s Climate and Environment Policy 2020-2023

https://www.copeland.gov.uk/sites/default/files/attachments/climate_action_policy.pdf

⁶ Copeland Borough Council’s Climate Action Plan (2021)

https://www.copeland.gov.uk/sites/default/files/attachments/climate_action_plan.pdf

2. Background

- 2.1 Copeland has a wind resource that has attracted developers who wanted to construct and operate wind turbines in the area.
- 2.2 Table 1 shows the development of the production of renewable electricity in Copeland between 2014 and 2020. This information is for the whole of the Copeland district, including data from the Lake District National Park as it has not been possible to separate the statistics. This shows that the total number of sites producing renewable energy increased by 301 within this period, with the majority of the increase coming from photovoltaic sites (95.7%). Whilst there has been an overall increase of sites producing wind energy from 2014, there was a loss of one site between December 2018 and December 2019. Despite the fact that the increase in wind energy sites has been much lower than the increase in photovoltaic sites, the majority of the overall increase in capacity between 2014 and 2020 has come from wind energy sites (55.1%).
- 2.3 As of December 2020, Government data shows that there were 1,042 sites in Copeland producing renewable electricity; these sites produced 72,236 MWh (approximately 8.25 3MW) from a potential installed capacity of 30.1MW.

Table 1: Levels of Renewable Energy in Copeland between 2014 and 2020

	Photovoltaics	Onshore Wind	Hydro	Anaerobic Digestion	Landfill Gas		Totals
Number of sites							
December 2014	702	35	4	1	1		743 sites
December 2015	868	41	5	1	1		916 sites
December 2016	891	44	6	1	1		943 sites
December 2017	930	44	6	1	1		982 sites
December 2018	957	44	6	1	1		1009 sites
December 2019	969	43	6	2	1		1,021 sites
December 2020	990	43	8	2	1		1,044 sites
Capacity							
December 2014	2.8	20.8	0.6	0.3	1.9		26.289MW
December 2015	3.4	22.3	0.7	0.3	1.9		28.558MW
December 2016	3.6	23.0	0.7	0.3	1.9		29.45MW
December 2017	3.8	23.0	0.7	0.3	1.9		29.595MW
December 2018	3.9	23.0	0.7	0.3	1.9		29.694MW
December 2019	3.9	22.9	0.7	0.5	1.9		29.9MW
December 2020	4.1	22.9	0.7	0.5	1.9		30.1MW
Generation							
December 2014	2,349	49,746	1,595	937	7,650		62,276.71MWh
December 2015	2,805	61,190	1,782	1,380	6,170		73,326.222MWh
December 2016	3,201	52,086	1,781	1,383	4,815		63,266.928MWh
December 2017	3,320	56,763	2,119	1,378	3,524		67,104.368MWh
December 2018	3,746	52,781	1,958	1,376	2,454		62,314.776MWh
December 2019	3,862	53,316	1,996	2,475	2,303		63,951MWh
December 2020	4,028	60,809	2,437	2,663	2,300		72,236MWh

(Source: <https://www.gov.uk/government/statistics/regional-renewable-statistics> September 2020)

- 2.4 A review of planning applications for wind turbines which were determined between the period of 1st April 2011 and 31st March 2021 has been undertaken (see Appendix 1). Although it should be noted that within this period, the most recent planning application determined was in September 2015; this reflects the significant reduction in demand for wind turbines following the withdrawal of national subsidies for wind energy.
- 2.5 Overall, there were 57 planning applications received for determination by Copeland Borough Council, with one consultation received on an application determined by Cumbria County Council. Of the 57 applications, 26 (45.6%) were approved, with three (5.3%) allowed at appeal. 24 (42.1%) were refused, with four (7%) withdrawn.
- 2.6 Assessing all the applications made within the Copeland borough (including the application determined by Cumbria County Council), 58 applications were made for a total of 79 turbines, with an average tip height of 59.1m and an average power output of 412.6kW per turbine.
- 2.7 The majority of the applications were for outputs of less than 99kW; only four applications had a total power output larger than 1MW:
- 0-99kW total power – 31 applications (53.4%)
 - 101-499kW total power – 8 applications (13.8%)
 - 500-999kW total power – 15 applications (25.9%)
 - 1MW and over total power – 4 applications (6.9%)
- 2.8 In terms of tip height, the majority of the 58 applications were for small scale (63.8%), with only 5.2% of applications for large scale⁷:
- Small scale (up to 50m) – 37 applications (63.8%)
 - Medium scale (51m-100m) – 18 applications (31%)
 - Large scale (101m and over) – 3 applications (5.2%)
- 2.9 There were a total of 35 turbines approved (either by the Council or at appeal) from 29 applications. These 35 turbines had an average tip height of 45.8m and an average power output of 640.9kW.

⁷ Definitions of small, medium and large scale taken from paragraph 1.3.5 of the Cumulative Impacts of Vertical Infrastructure Study (<https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/42089105056.PDF>)

3. Policy Context

- 3.1 This section summarises planning policy and guidance which is applicable to planning for onshore wind energy.

National Planning Policy Framework 2021

- 3.2 The National Planning Policy Framework sets out the Government's planning policies and identifies how these should be used as a framework when preparing Local Plans.
- 3.3 It identifies that the planning system "*should support the transition to a low carbon future*", including through the support of "*renewable and low carbon energy and associated infrastructure*"⁸. To help increase the use and supply of renewable and low carbon energy, Local Plans should consider identifying suitable areas for renewable and low carbon energy sources⁹.
- 3.4 Footnote 49 of the National Planning Policy Framework incorporates the provisions of the 2015 Written Ministerial Statement¹⁰ which states that planning applications for new wind turbines (i.e. not repowering schemes) should not be considered acceptable unless the application site lies within an area identified as suitable for wind energy development within a development plan (local plans and/or neighbourhood plans). Whilst repowering schemes are not required to be in an area which is identified as suitable for wind energy development, they will be subject to a full assessment against local and national policies.
- 3.5 Applicants are also required to demonstrate that any planning impacts identified by the affected local community have been fully addressed. In addition, the proposal should also have the backing of the affected local community.

Planning Practice Guidance

- 3.6 The Planning Practice Guidance provides guidance which supports the National Planning Policy Framework. The Planning Practice Guidance for Renewable and Low Carbon Energy¹¹ identifies that the planning system has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable. It re-iterates that a planning application for a wind energy development should not be approved unless there is an identified suitable area in either a Local Plan or a Neighbourhood Plan.
- 3.7 The Guidance acknowledges that there are no set criteria for how to identify areas suitable for wind energy development but however the area is identified, the views of the local communities should be listened to. The area proposed by the Council has been subject to public consultation during the Preferred Options consultation of the Local Plan and will be again at Publication Draft stage. Comments received during the Preferred Options consultation and the subsequent pre-publication consultation (which didn't seek views on

⁸ Paragraph 148 of the National Planning Policy Framework

⁹ Paragraph 151(b) of the National Planning Policy Framework

¹⁰ Written Ministerial Statement of 18th June 2015 - <https://www.parliament.uk/documents/commons-vote-office/June%202015/18%20June/1-DCLG-Planning.pdf>

¹¹ Renewable and Low Carbon Energy Planning Practice Guidance - <https://www.gov.uk/guidance/renewable-and-low-carbon-energy>

the Suitable Area or the Wind Energy policy specifically) are included in Appendix 4, along with the Council's response to those comments.

- 3.8 Local Planning Authorities will need to take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts.
- 3.9 When identifying an area through the Local Plan, and determining planning applications for wind turbines, the local planning authority should consider the following:
- the need for renewable or low carbon energy does not override environmental protections;
 - cumulative impacts require particular attention, especially the increasing impact wind turbines can have on landscape and local amenity;
 - local topography;
 - heritage assets and their setting;
 - proposals in National Park and Areas of Outstanding Natural Beauty, and in areas close to them where there could be an adverse impact on the protected area, will need careful consideration;
 - the protection of local amenity is an important consideration which should be given appropriate weight in planning decisions.
- 3.10 In terms of the use of buffer zones and separation distances, local planning authorities should not make them so inflexible as to rule out otherwise acceptable renewable energy developments (unless set back distances are used for safety purposes).

Cumbrian Evidence Base documents

- 3.11 A number of planning authorities in Cumbria jointly produced the Cumbria Wind Energy Supplementary Planning Document in 2007; this was adopted by Copeland Borough Council in January 2008.
- 3.12 This guidance was developed to support the development and implementation of renewable energy policies in planning policy documents and provide consistent guidance for wind energy development within Cumbria. The document consists of two parts; Part 1 provides general planning guidance for wind energy schemes covering a range of factors including: biodiversity; highways; landscape; visual impact; and cumulative effects. Part 2 provides specific guidance on landscape and visual issues and an assessment of the landscape capacity for each of the main landscape types in Cumbria.
- 3.13 In 2011, the Cumbria Landscape Character Guidance and Toolkit maps were produced. This describes the character of different landscape types across the County and is an integrated framework to provide guidance to users to help maintain their distinctiveness.
- 3.14 It is acknowledged that the evidence base used to determine the suitable are for wind energy development was produced a number of years ago. In 2021, consultants, on behalf of Copeland Borough Council, produced two landscape studies¹² which assessed the landscape

¹² A settlement Landscape Character Assessment that reviewed the landscape character types in and around settlements and a Landscape Character Assessment that considers the remaining parts of the borough.

character areas across Copeland¹³. One of the reasons that these studies were commissioned was to assess how the landscape may have changed since the original studies. The conclusion was that there has been some limited developmental changes but it is not considered to be of a scale or amount to significantly alter the overall character of the landscape of the area and that the documents remain a useful baseline of information.

- 3.15 It is important to note that whilst this Wind Energy Technical Document uses the broader landscape character to help define a suitable area as required by the Government, there are differences within each landscape character area and not all locations within a particular landscape type will have the same characteristics and, as such, sensitivities will vary throughout an area. For example, Landscape Character Area Type 5 is identified as being in the suitable area, but there are variations in the landscape sensitivity across the underlying landscape subtypes as identified in the Copeland LCA. Some of the subtypes have a High-Medium sensitivity whilst other subtypes have Medium-Low sensitivity to development. In this instance, the type and scale of development will be considered differently across the subtypes. It may be that only small scale turbines may be permitted in the areas with higher sensitivities, whilst larger turbines may be more acceptable in those areas with lower sensitivities.
- 3.16 It is important to remember that just because a location lies within the identified suitable area, planning permission will not be automatically guaranteed. The identified suitable area acts as a guide and the Council will fully assess all planning applications in line with Local Plan policies and the relevant landscape studies.

Copeland Borough Council Local Plan

- 3.17 Copeland Borough Council is currently preparing a new Local Plan for the Borough (for areas outside of the Lake District National Park). The Local Plan will contain planning policies which will be used in the determination of planning applications, as well as providing strategic guidance on the scale and distribution of development. The Local Plan will also allocate sites for specific development uses (e.g. housing, retail and employment). This Local Plan will cover the period 2021-2038 and, once adopted, will replace the current Copeland Local Plan 2013-2028 Core Strategy and Development Management Policies and any saved policies from the 2001-2016 Local Plan.
- 3.18 The Issues and Options consultation for the new Local Plan was released in November 2019. Question CC4 of the consultation asked respondents 'Which parts of the borough should be excluded when identifying land as Suitable Areas for Wind Energy development?' Respondents were provided with 12 options and could choose as many options as they wanted; Table 2 summarises the responses.

¹³ <https://www.copeland.gov.uk/content/copeland-local-plan-2021-2038-evidence-base>

Table 2: Responses to Question CC4 of the Copeland Issues and Options Paper, November 2019

Option		Number of responses	Option		Number of responses
1	All Natura 2000 Sites and 250m buffer	8	7	Landscapes sensitive to change as informed by the Council's Landscape Assessment and the County Council LCA	8
2	Sites of Special Scientific Interest and 250m buffer	10	8	Nationally important nature conservation sites	8
3	All Conservation Areas and sites containing listed buildings or scheduled ancient monuments	10	9	Areas of land less than 0.5 hectares	6
4	Local Geological Sites	9	10	High pressured gas pipelines	8
5	All built up areas including proposed allocations	8	11	Areas where evidence shows there is no wind capacity	6
6	A specific buffer around all built up areas including proposed allocations	8	12	Other option, please state	See below

- 3.19 For Option 12, comments were received that the St. Bees and Whitehaven Heritage Coast and the setting of the Lake District National Park World Heritage site should be excluded, with all having buffers identified too.

4. Options Considered

- 4.1 Following the release of the Ministerial Statement, there are three options which the Council can explore in response to its requirements:
- Option 1 – do nothing.
 - Option 2 – identify the whole borough (excluding the Lake District National Park) as an area suitable for wind energy development.
 - Option 3 – identify the whole borough (excluding the Lake District National Park) as suitable for all types of wind energy development, with the exclusion of some of the more sensitive areas.
- 4.2 The decision not to include an area suitable for wind energy within the Policies Map of the Local Plan (Option 1) would be inconsistent with the National Planning Policy Framework; therefore this option has not been taken forward as it would raise soundness issues.
- 4.3 To identify the whole borough (excluding the Lake District National Park) as suitable for wind energy development (Option 2) would satisfy the requirements of the National Planning Policy Framework insofar as the Local Plan would include an area. No sites were put forward for consideration for wind energy developments in the Call for Sites process; therefore, it is assumed that there is no demand for site specific allocations for this land use. As the whole borough would be identified as 'suitable', the Council would continue to use adopted planning policies to determine planning applications for wind development.
- 4.4 Copeland contains areas which are high value in terms of ecology, landscape and the environment. Therefore, it is considered that the most suitable choice is to identify the whole borough (with the exception of the Lake District National Park) as suitable for wind energy development, but to also identify areas which are considered to be more sensitive to this type of development (Option 3); these identified areas would be subject to restrictions on the scale of wind development. It is considered that this is the most flexible approach as it will provide an opportunity within the borough for appropriate wind energy development whilst providing protection for sensitive landscapes.

5. Assessment of evidence base documents

- 5.1 In order to identify the areas which could be classified as ‘sensitive’, an assessment has been undertaken utilising existing evidence base documents. These documents will assess the technical capacity within Copeland’s landscape to accommodate wind energy, as well as assessing the sensitivity of the landscape and the environment to such development.

Technical Capacity

Potential wind capacity

- 5.2 In 2011, the Cumbria Renewable Energy Capacity and Deployment Study was produced; this technical study was designed to support the development of appropriate and robust renewable energy planning policies. The Study provides an assessment of the amount of resources available that could be used to generate renewable energy up to 2030, identifying the overall potential technical capacity within Cumbria.
- 5.3 Table 5.4¹⁴ within the Study shows that Cumbria has an onshore wind resource of 2,885.6MW until 2030; 5.4% of this (154.5MW) lies within Copeland. Of the 154.5MW, 2.1MW is small scale onshore wind, with 152.4MW being large scale onshore wind.
- 5.4 The Study then identified landscape constraints which could limit the potential for commercial wind farm development for the large scale onshore wind capacity. Table 3 shows that by taking these constraints into account, the initial potential capacity within Copeland reduces from 152.4MW to 81.8MW, a reduction of 46.3%.

Table 3: Potential Wind Capacity in Copeland

	Large (MW) (125m to blade tip)	Medium (MW) (90m to blade tip)	Small (MW) (65m to blade tip)	Total (MW)
Initial potential capacity	86.6	6	59.8	152.4
Potential capacity taking into account landscape constraints	35.6	4	42.3	81.8
Reduction in capacity once landscape constraints are considered	-51MW (-58.9%)	-2MW (-33.3%)	-17.5MW (-29.3%)	-70.6MW (-46.3%)

Source: Tables 5-9, 5-10 and 5-11 of the Cumbria Renewable Energy Capacity and Deployment Study

Wind speeds

- 5.5 6.5 metres per second is the speed considered suitable for wind energy development (although it is recognised that some turbines can operate at lower wind speeds)¹⁵. The Cumbria Wind Energy Supplementary Planning Document (SPD) identifies that generally in Cumbria the wind resource is the greatest on west facing upland sites and along the coast.

¹⁴ Page 51 of the Cumbria Renewable Energy Capacity and Deployment Study
(<https://www.copeland.gov.uk/sites/default/files/attachments/cumbrenewencapanddeploystudy11.pdf>)

¹⁵ Paragraph 1.26 of the Cumbria Wind Energy Supplementary Planning Document
(<https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/39435124412.PDF>)

- 5.6 The SPD identifies that many of the windiest parts of Cumbria actually fall within national landscape designations; Figure 1 shows the areas of wind speed greater than 6.5 metres per second in Copeland¹⁶.
- 5.7 This shows that along the coastline between Workington and St. Bees there are wind speeds which average more than 6.5 metres per second. There are lower wind speeds south of St. Bees, although speeds do increase around Sellafield. In the south of the borough, there is a higher wind speed resource to the west of Haverigg. Inland, there are higher wind speeds around Distington, Whitehaven, Cleator Moor and Egremont.

Figure 1: Areas of Wind Speed Greater than 6.5 metres per second in Copeland



Landscape Capacity

- 5.8 The Cumbria Wind Energy Supplementary Planning Document includes a number of maps, including one which displays the landscape character classification across Cumbria (see Figure 2)¹⁷ and another map which identifies the landscapes capacity for wind energy development (see Figure 3)¹⁸.

¹⁶ Excerpt taken from Map 1 of the Cumbria Wind Energy Supplementary Planning Document

¹⁷ Map 7 of the Cumbria Wind Energy SPD

(<https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/39435141628.PDF>)

¹⁸ Map 8 of the Cumbria Wind Energy SPD

(<https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/39435141836.PDF>)

Figure 2: Landscape Character Classification



Landscape Character Type and Sub Types

1 Estuary and Marsh	8 Main Valleys	12 Higher Limestone
1a Intertidal Flats	8a Gorges	12a Limestone Farmland
1b Coastal Marsh	8b Broad Valleys	12b Rolling Fringe
2 Coastal Margins	8c Valley Corridors	12c Limestone Foothills
2a Dunes and Beaches	8d Dales	12d Moorland and Commons
2b Coastal Mosses	9 Intermediate Moorland and Plateau	13 Fells and Scarps
2c Coastal Plain	9i Intermediate Moorland	13a Scarps
3 Coastal Limestone	9a Open Moorlands (Bewcastle Fells)	13b Moorland, High Plateau
3a Open Farmland and Pavements	9c Forests (Kershope and Spadeadam)	13c Fells
3b Wooded Hills and Pavements	9d Ridges (Furness)	14 Urban Areas and Fringes
3c Disturbed Areas	9ii Moorland Hill and Low Plateaus	14a Coastal Urban Fringe
4 Coastal Sandstone	9a Open Moorlands (West Cumbria)	14b Urban Fringe
5 Lowland	9b Rolling Farmland and Heath (Eden and South Lakeland)	
5a Ridge and Valley	9d Ridges (West Cumbria)	
5b Low Farmland	10 Sandstone Ridge	
5c Rolling Lowland	11 Upland Fringes	
5d Drained Mosses	11a Foothills	
6 Intermediate Land	11b Low Fells	
7 Drumlins		
7a Low Drumlins		
7b Drumlin Field		
7c Sandy Knolls and Ridges		

Figure 3: Landscape Capacity for Wind Energy Development



Landscape Classification Subtype

Orange	Moderate/High Landscape Capacity
Yellow	Moderate Landscape Capacity
Light Green	Low/Moderate Landscape Capacity
Light Blue	Low Landscape Capacity

Key

- Lake District National Park
- Yorkshire Dales National Park
- Solway Coast AONB
- North Pennines AONB
- Arnsdale and Silverdale AONB
- Frontiers of the Roman Empire: Hadrian's Wall - visual envelope
- St Bees Heritage Coastline
- Cumbria County Council Boundary

5.9 Table 4 summarises the landscape types within Copeland in relation to their overall sensitivity to development and their capacity for wind energy development¹⁹; Appendix 3 contains the full details of each landscape type. This summary shows that there are no landscape areas within Copeland which have low sensitivity, or high capacity for wind energy development.

¹⁹ Part 2 of the Cumbria Wind Energy SPD

(<https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/3943512467.PDF>)

Table 4: Landscape Characteristics and their overall sensitivity and capacity for wind energy development

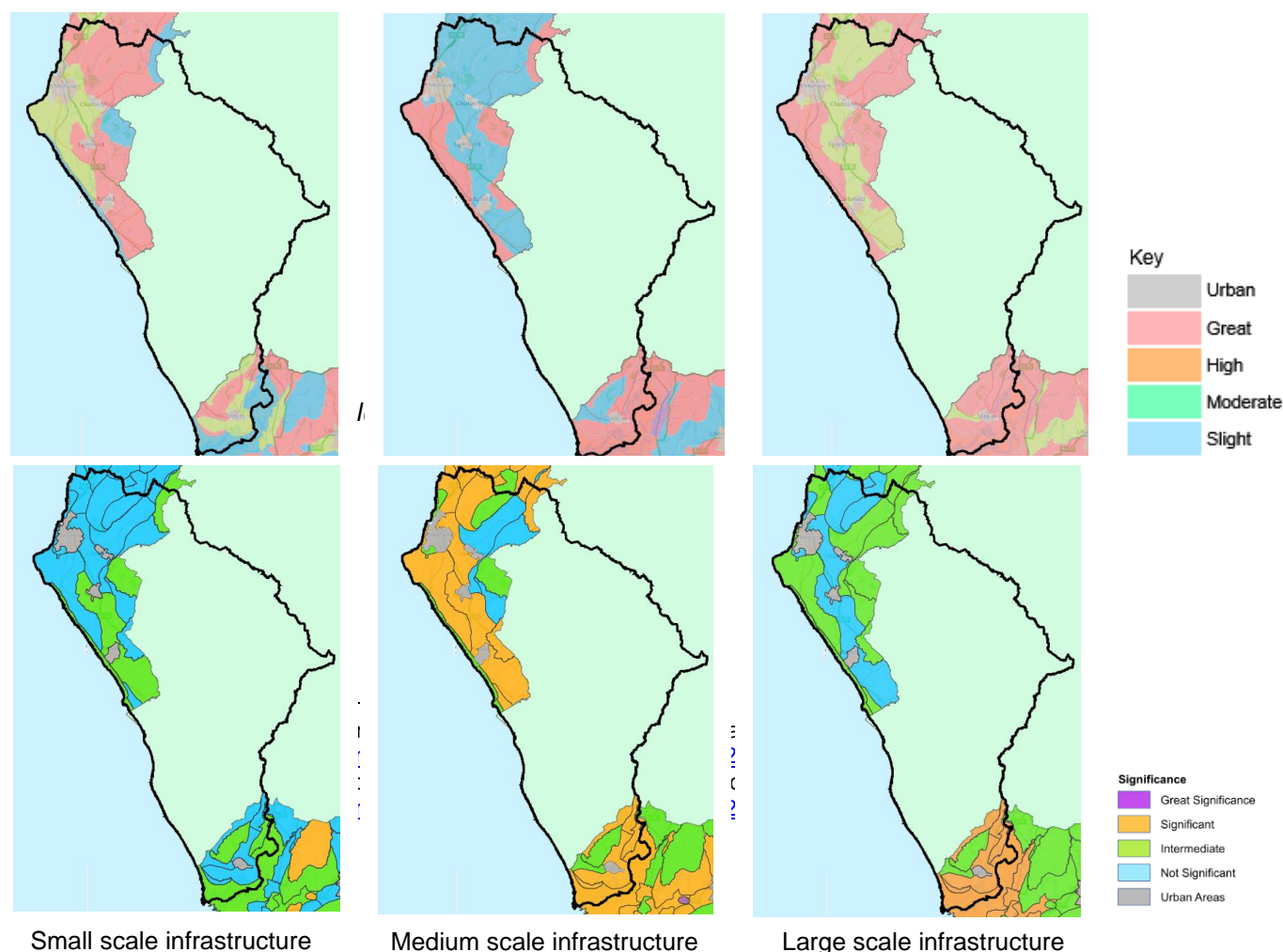
Landscape Type	Overall Sensitivity	Capacity
1 – Estuary and Marsh	Moderate/High	Low
2 – Coastal and Margins	Moderate/High	Low/Moderate
4 – Coastal Sandstone	Moderate/High	Low/Moderate
5 – Lowland	Moderate	Moderate
9ii – Moorland Hills and Low Plateaus	Moderate	Moderate
11 – Upland Fringes	Moderate	Low/Moderate
12 – Higher Limestone	Moderate/High	Low/Moderate

Cumulative Impacts

5.10 In October 2014, the ‘Cumulative Impact and Vertical Infrastructure Study’ was released. This Study assessed the impact of all vertical energy and communications infrastructure over 15m across Cumbria. The Study assessed how developments introducing vertical elements into the landscape would result in cumulative effects on landscape character and visual amenity. It assessed the impacts of different scales of infrastructure: small scale (15m-50m), medium scale (51m-100m) and large scale (101m and over).

5.11 Figure 4 shows the sensitivity of landscape areas to vertical infrastructure installations²⁰, whilst Figure 5²¹ shows the significance of landscape effects to different scales of vertical infrastructure.

Figure 4: Sensitivity of landscapes to different scales of vertical infrastructure



Summary of findings

- 5.12 Using the evidence, it is considered the most appropriate method of identifying the landscape areas which would benefit from extra protection from wind energy development is to use the capacity assessment (see Table 4). This capacity assessment considers sensitivity to development, landscape values, international and national designations and, where applicable, other interests such as historical, ecological, cultural and geological.
- 5.13 Therefore, Landscape Types 1, 2, 4, 11 and 12 have been identified as having low or low-moderate capacity to accommodate turbine development (see Figure 6). These landscape types are particularly sensitive to the development of small scale infrastructure and, for some types, there would be intermediate significant effects if small scale infrastructure was constructed within these areas.

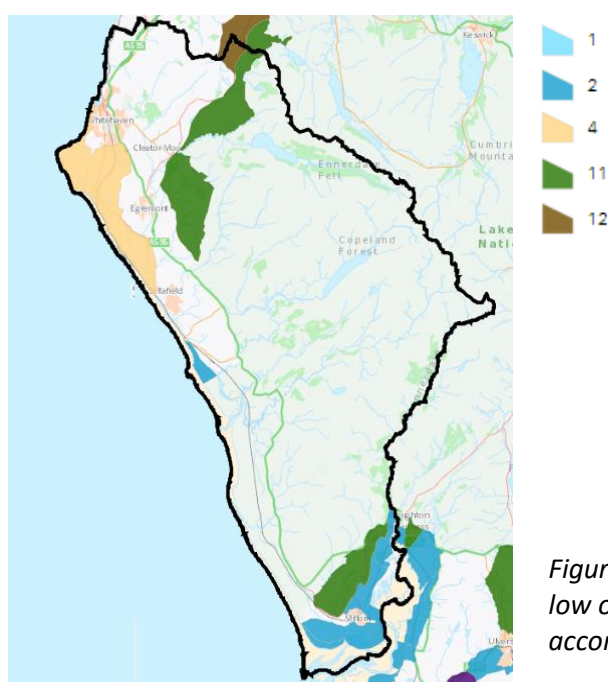


Figure 6: Landscapes types which have low or low-moderate capacity to accommodate turbine development

6. Identifying constraints

- 6.1 Chapter 5 assessed the current evidence base to identify capacity and landscape constraints for wind energy development. It identified which landscape types were particularly susceptible to the effects wind energy development within the borough using capacity, landscape sensitivities and cumulative impacts.
- 6.2 This chapter will look at identifying constraints within the borough which may be more sensitive to wind energy development.
- 6.3 The Issues and Options paper for the Local Plan (2017-2035) was released for consultation in November 2019. Within this, there was a question about which constraints should be used to identify a suitable area for wind energy development, with a list provided of potential constraints. From this list, and the responses received to the consultation, three constraint options were considered (see Table 5).

Table 5: Constraints Considered

Constraints Option 1	Constraints Option 2	Constraints Option 3
World Heritage Sites plus a buffer	World Heritage Sites plus a buffer	World Heritage Sites plus a buffer
St. Bees Head Heritage Coast	St. Bees Head Heritage Coast	St. Bees Head Heritage Coast
	All Natura 2000 Sites (SPA's and SAC's)	All Natura 2000 Sites (SPA's and SAC's)
	Sites of Special Scientific Interest	Sites of Special Scientific Interest
	All Conservation Areas and sites containing listed buildings or scheduled ancient monuments	All Conservation Areas and sites containing listed buildings or scheduled ancient monuments
	Nationally important nature conservation sites	Nationally important nature conservation sites
	Local Geological Sites	Local Geological Sites
		Landscapes sensitive to change (as identified in Chapter 5)
		High pressured gas pipelines (plus 135m buffer for safety purposes)
		Green Wedges

6.4 Option 3 was taken forward as it was considered to be the approach which best reflected international, national and local designations and considerations.

6.5 In order to provide flexibility, not all of the constraints considered when assessing the suitability of a wind energy development have been mapped; when determining planning applications, the Council will look at the Local Plan as a whole, and other policies will be used in conjunction with the identified Suitable Area. Examples of issues which will be assessed through the planning application process could include the following (please note that this is a non-exhaustive list and other appropriate constraints will be considered):

- Noise
- Shadow flicker
- Visual amenity
- Railways
- Roads
- PROWs
- Overhead electricity lines
- Local wildlife sites
- Historic parks and gardens
- Impact Risk Zones
- Impacts on heritage assets and archaeology
- Registered Battlefields
- Bodies of water
- Explosive Safeguarding Zones
- Aviation flight paths

6.6 When planning applications are determined, the Council will liaise with relevant external consultees such as Cumbria County Council, Ministry of Defence, OFCOM and National Grid with regards to issues such as impact on the strategic road network, electromagnetic transmissions (e.g. radio and television signals) and overhead lines. Developers will also be expected to liaise with such organisations when developing their scheme to ensure issues

are addressed prior to the submission of a planning application. When determining planning applications, the Council will undertake the required public consultation so that members of the public can submit their comments.

- 6.7 Some of the constraints included within the Issues and Options paper were removed; the reasoning for this is set out below.
- 6.8 The Council originally considered adding a 250m buffer to all Natura 2000 Sites (SPA's and SAC's) and Sites of Special Scientific Interest. However, the Council has decided not to add a buffer to these designations; the buffer was to be used to reflect Impact Risk Zones, a GIS tool used by Natural England to make a rapid assessment of the potential risks posed by development proposals to certain designations. As each designated site has a different zone, and Natural England must be consulted each time a planning application falls within one of these zones, it was decided not to map the buffer as a constraint, instead leaving it as a matter for consideration when planning applications are determined.
- 6.9 The Issues and Options paper included an option which suggested that the identified Suitable Area could exclude areas where evidence shows there is no wind capacity. It was decided not to map this evidence as a constraint as it is considered that this is a technical consideration which would be assessed by developers when choosing a site.
- 6.10 Another option included in the Issues and Option consultation was to exclude areas of land less than 0.5 hectares from the identified suitable area. This has not been taken forward as it was considered that this may prevent suitable small scale development which may otherwise have no or little adverse impact.
- 6.11 Option 6 of Question CC4 in the Issues and Options paper questioned if there should be a buffer placed around all built up areas, including proposed allocations. A buffer for this has not been included within the constraint mapping as it is considered that potential impacts of a proposed wind energy development upon a settlement would be better assessed through a planning application.
- 6.12 Green Wedges have been included as a constraint because the purpose of them is to preserve the open character of limited gaps between settlements and to prevent development eroding this. Seven Green Wedges have been identified as key within the borough as part of the Copeland Settlement Landscape Character Assessment 2020.
- 6.13 Some responses to the Issues and Options paper and later iterations of the Local Plan requested that the St. Bees and Whitehaven Heritage Coast should also be included as a constraint. Whilst the Whitehaven extension has not yet been formally defined by Natural England it was approved by the Council in April 2019. The decision was informed by a report from Land Use Consultants²² which highlighted the landscape value and the sensitive nature of the location. Given this, the full St Bees and Whitehaven Heritage Coast has been removed from the Suitable Area.

²² <http://solwayfirthpartnership.co.uk/wp-content/uploads/2018/09/170110-St-Bees-Heritage-Coast-Extension-FINAL.pdf>

- 6.14 The Council received requests to exclude the area of the borough which has been submitted as part of a proposal to extend the Lake District National Park at its southern boundary²³; in Copeland, this would affect the Millom Without parish. A formal request for this extension was submitted by Friends of the Lake District to Natural England for consideration in June 2019. Given that there has been no formal response by Natural England to this proposal, the Council does not consider that excluding the proposed extension area on this basis is sufficient justification. However, it should be noted that the majority of the proposed extension area fall within Landscape Area types 2 and 11, which were identified in Chapter 5 as having ‘low-moderate’ capacity for wind energy development.
- 6.15 The Preferred Options consultation was undertaken between 20th September and 30th November 2020. As part of this, a number of comments were received in relation to the Wind Energy Technical Document, the majority of which were objections. Appendix 4 lists all comments received during the consultation and sets out how the Council has addressed them.
- 6.18 Further consultation was undertaken by the Council between 13th September and 17th October 2021. This was entitled the ‘Focussed Pre-Publication Draft Changes Consultation’ and was designed to provide stakeholders and members of the public the opportunity to comment on changes made to the Local Plan following the Preferred Options consultation. Whilst the Wind Energy Paper was not subject to this consultation, two comments were received which provided objections to the inclusion of particular areas of Copeland within the identified suitable area²⁵. These comments are also listed in Appendix 4.

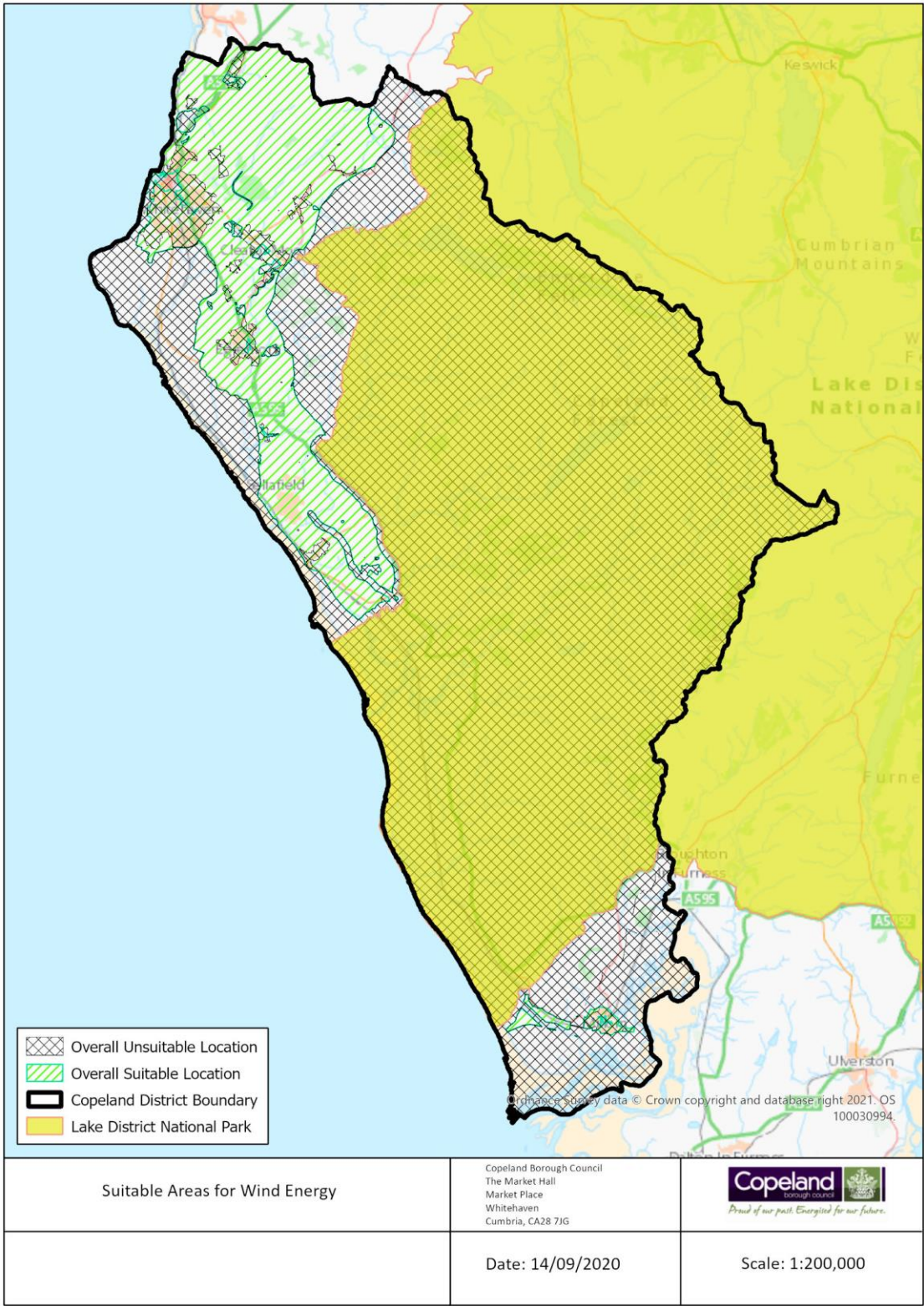
²³ Friends of the Lake District – Southern Boundary Extension proposals
(<https://www.friendsofthelakedistrict.org.uk/southern-boundary-extension>)

²⁵ Focussed Pre-Publication Draft Changes Consultation Response report
<https://www.copeland.gov.uk/sites/default/files/attachments/prepubconsultationresponses.pdf>

7. Area Suitable for Wind Energy

- 7.1 As outlined in Chapter 4, the Council identified Option 3 as the preferred option in determining how a suitable area for wind development should be identified. Option 3 sought to identify the whole borough (excluding the Lake District National Park) as suitable for wind energy, with the exclusion of some sensitive areas.
- 7.2 The evidence has shown that there are areas within Copeland which would be particularly sensitive to the installation of wind turbines. Chapter 5 identified that Landscape Character Types 1, 2, 4, 11 and 12 would benefit from extra protection from wind energy development. In addition, there are a number of constraints (see Chapter 6) which have been identified as sensitive which the Council will afford extra protection to from wind energy development, including for locations identified as suitable for wind energy development.
- 7.3 These areas and constraints which have been identified as having higher sensitivity will be excluded from the area identified as suitable for wind energy development in Copeland in terms of medium and large scale structures. However, rather than prohibiting all types of wind energy development in these areas, the Council intends to identify these areas as suitable for appropriate small scale wind development (see Figure 7).
- 7.4 It is important to note that if a site falls within an area identified as 'suitable', it does not mean that planning applications within this site for wind energy development will be automatically granted permission. All applications will be considered against all adopted Local Plan policies, as well as national planning policy and guidance. Should there be issues/constraints which cannot be satisfactorily addressed, then permission will be refused.
- 7.5 Whilst there are currently no adopted Neighbourhood Plans in Copeland, should communities bring forward proposals to create such plans, they may seek to amend the areas identified as suitable for wind energy development within the designated Neighbourhood Area.
- 7.6 Overall, it is considered that this approach is the most positive and flexible, in line with national planning policy, whilst protecting Copeland's valuable landscape, heritage, ecological, geological and environmental assets.

Figure 7: Preferred Option for Area Suitable for wind energy development



Appendix 1: Planning applications for wind energy in Copeland between 2011 and 2021

Reference	Decision Date	Description	Address	No. of turbines	Height to tip (m)	Power	Decision
4/11/2183/OF1	02/06/2011	Erection of three 15m micro wind turbines	Yeorton Hall Farm, Egremont	3	15	11.5kW	Refused
4/11/2111/OF1	09/09/2011	Erection of a micro wind turbine	Land near to 5 Ellerbeck Barns, Egremont	1	15	5kW	Approved on Appeal
4/11/2361/OF1	13/10/2011	Erection of a wind turbine	Land at High Thorny, Carleton, Egremont	3	79.6	500kW	Refused
4/11/2377/OF1	13/10/2011	New stadium (3 200 capacity) with associated grandstand and clubhouse facilities and ancillary accommodation	County Ground, Coach Road, Whitehaven	1	6.5	2.5kW	Approved
4/11/2439/OF1	10/11/2011	Erection of a single 100kw wind turbine	North of Beck Farm, Millom	1	47.5	100kW	Refused
4/11/2478/OF1	10/11/2011	Erection of a micro wind generator	Land at Moor Close, Outrigg Road, St. Bees/Egremont	1	16	5kW	Approved
4/11/2469/OF1	18/11/2011	Erection of a domestic wind turbine	Sea Breeze, South Beach, Braystones, Beckermest	1	6	0.4kW	Withdrawn
4/11/2534/OF1	05/01/2012	Erection of 2 small wind turbines	Land at Whangs Farm, Egremont	2	34.2	50kW	Approved
4/11/2535/OF1	05/01/2012	Erection of a small wind turbine	Land at Marlborough Hall Farm, Egremont	1	34.2	50kW	Withdrawn
4/11/2593/OF1	02/02/2012	Erection of one 15kw wind turbine	Field no. 4381, Land to south of Huntinghow Cottage/west of Quality Corner Moresby, Whitehaven	1	19.25	15kW	Approved
4/12/2096/OF1	28/03/2016	Erection of a 22.52m high wind turbine	Land at Springfield Farm, Bigrigg, Egremont	1	22.52	12kW	Approved
4/12/2119/OF1	26/04/2012	Erection of small scale wind turbine	Land near Ellerbeck Barns, Egremont	1	15.05	5kW	Approved
4/12/2123/OF1	26/04/2012	Erection of a single wind turbine	Land near Yeorton Hall Farm, Haile, Egremont	1	79.6	500kW	Refused
4/12/2124/OF1	30/04/2012	Erection of domestic wind turbine (retrospective)	Seabreeze, South Beach, Braystones, Beckermest	1	6.0	0.4kW	Approved
4/12/2173/OF1	23/05/2012	Erection of a wind turbine	Land at Bailey Ground Farm, Seascale	1	39	80kW	Approved
4/12/2120/OF1	24/05/2012	Erection of single wind turbine	Land at Drigg Moorside Farm, Drigg, Holmrook	1	79.6	500kW	Refused

Reference	Decision Date	Description	Address	No. of turbines	Height to tip (m)	Power	Decision
4/12/2250/0F1	20/06/2012	Erection of a single wind turbine	Land to north west of Distington	1	34.2	50kW	Approved
4/11/2480/0F1	16/07/2012	Erection of a wind turbine	Land at Green House Farm, Lowca, Whitehaven	1	79.6	500kW	Approved on Appeal
4/12/2223/0F1	19/07/2012	Erection of wind turbine	Land at High House Farm, Wilton, Egremont	1	34.4	50kW	Refused
4/12/2170/0F1	15/08/2012	Erection of a single wind turbine	Fields 4400 & 6382, land adjacent to Watch Hill, Low Moresby, Whitehaven	1	74	500kW	Approved
4/12/2246/0F1	16/08/2012	Erection of a single wind turbine	Land to the north west of Kidburngill Farm, Lamplugh	1	67	900kW	Refused
4/12/2222/0F1	03/09/2012	Installation of a single small wind turbine	Land at Marlborough Hall Farm, Egremont	1	34.2	50kW	Withdrawn
4/11/2485/0F1	17/10/2012	Construction and operation of a wind farm consisting of 6 no wind turbines, control building and anemometer	Land to the west of Steel Brow Road (known as Weddicar Rigg), Arlecdon, Frizington	6	115	2MW	Refused
4/12/2547/0F1	30/01/2013	Erection of wind turbine	Land at High House Farm, Wilton, Egremont	1	34.4	50kW	Refused
4/12/2557/0F1	30/01/2013	Erection of a single wind turbine	Land at Lowca Top Road, Lowca, Whitehaven	1	79.6	500kW	Approved
4/12/2397/0F1	31/01/2013	Erection of single 67m wind turbine	Land to north east of Middle Gill Farm, Howgate, Whitehaven	1	67	900kW	Refused
4/12/2566/0F1	27/03/2013	Installation of a single 11kW Gaia wind turbine	Land at Low Thorney Farm, Carleton, Egremont	1	24.8	11kW	Approved
4/13/2026/0F1	22/05/2013	Installation of a 500kW wind turbine	Land to south west of Fairladies Farm, Outrigg Road, Egremont	1	66	500kW	Refused
4/13/2071/0F1	23/05/2013	Installation of single wins turbine	Marlborough Hall Farm, Egremont	1	34.2	50kW	Approved
4/13/2061/0F1	11/06/2013	Erection of wind turbine	Drigg Moorside Farm, Drigg, Holmrook	1	79.6	400kW	Approved
4/13/2091/0F1	19/06/2013	Erection of a single wind	Land near Yeorton Hall Farm, Haile, Egremont	1	45.5	400kW	Approved
4/13/2145/0F1	18/07/2013	Installation of a single wind turbine	Land near Bonny Farm, Moresby Parks, Whitehaven	1	66	500kW	Refused

Reference	Decision Date	Description	Address	No. of turbines	Height to tip (m)	Power	Decision
4/13/2157/OF1	22/07/2013	Installation of a single wind turbine	Land at Highfield Farm, Egremont	1	45.5	250kW	Approved
4/13/2209/OF	05/08/2013	Installation of a single 500kw wind turbine	Land at Winder, Frizington	1	70	500kW	Withdrawn
4/13/2173/OF1	15/08/2013	Installation of a single 250kw wind turbine	Land at Stubsgill Farm, Distington	1	45.5	250kW	Approved
4/13/2217/OF1	12/09/2013	Installation of a 5kw small wind turbine	Land at Hawes Farm, Kirkland	1	15	5kW	Approved
4/13/2318/OF1	09/10/2013	Installation of single wind turbine	Land south of Langhorn Farm, Bigrigg, Egremont	1	46.3	50kW	Approved
4/13/2240/OF1	18/12/2013	Proposed siting of a single wind turbine to replace planning permission 4/12/2199/OF1	Land at Green Lonning, St. Bees	1	34.2	50kW	Approved
4/14/2019/OF1	20/01/2014	Erection of a single wind turbine	Land at Drigg Moorside, Drigg, Holmrook	1	57	500kW	Withdrawn
4/13/2392/OF1	21/01/2014	Proposed siting of a single wind turbine	Land at Oxenriggs Farm, Egremont	1	34.5	50kW	Approved
4/13/2440/OF1	27/02/2014	Proposed siting of a single wind turbine	Land at Bailey Ground Farm, Santon Way, Seascale	1	45	225kW	Refused
4/13/2511/OF1	27/02/2014	Erection of single wind turbine	Land near Yeorton Hall Farm, Haile, Egremont	1	57	500kW	Refused
4/13/2125/OF1	16/04/2014	Erection of one wind turbine	Land at Castlerigg Farm, Moresby Parks, Whitehaven	1	77	50kW	Approved on Appeal
4/14/2102/OF1	21/05/2014	Erection of single wind turbine	Drigg Moorside Farm, Drigg, Holmrook	1	57	500kW	Refused
4/14/9005/OF2	15/07/2014	Installation of a single 5kw wind turbine on a 15m mast	Arlecdon Wastewater Treatment Works, Arlecdon, Frizington	1	17.75	5kW	No Objection (CCC application – approved)
4/12/2251/OF1	10/09/2014	Five wind turbines with a maximum height of 120.5 metres new access track alterations to existing	Land to west and south of HMP Haverigg, off North Lane, Haverigg, Millom	5	120.5	3MW	Refused
4/14/2250/OF1	25/09/2014	Installation of a single wind turbine	Langthwaite Farm, Millom	1	21.6	10kW	Approved
4/14/2374/OF1	12/11/2014	Installation of 1 no. wind turbine with blade tip height of 50m	Land off Byersteads Road, Sandwith, Whitehaven	1	50	50kW	Refused


Reference	Decision Date	Description	Address	No. of turbines	Height to tip (m)	Power	Decision
4/14/2241/OF1	10/12/2014	Installation of two 11kw Gaia wind turbines	High House, Wilton, Egremont	2	21.5	11kW	Approved
4/14/2251/OF1	10/12/2014	Proposed siting of a single wind turbine	Petersburgh Farm, Beckermest	1	45	225kW	Approved
4/14/2375/OF1	25/02/2015	Erection of one wind turbine	Land near Cobra Castle, Egremont	1	48.1	62kW	Refused
4/14/2502/OF1	05/03/2015	Erection of a single wind turbine	Land to south of Boonwood Farm, Distington	1	48.01	62kW	Refused
4/14/2475/OF1	25/03/2015	Proposed siting of a single wind turbine	Land to south of Green Lonning, St. Bees	1	36.6	50kW	Refused
4/14/2487/OF1	25/03/2015	Installation of a single wind turbine	Land near Cobble Hall Farm, Cleator	1	48.01	50kW	Refused
4/15/2022/OF1	10/06/2015	Erection of a wind energy development of 5 wind turbines	Land south of HMP Prison, off North Lane, Haverigg, Millom	5	100	15MW	Approved
4/14/2105/OF1	08/07/2015	Erection of two wind turbines	Land at Church House Farm, Calderbridge, Seascale	2	110	1.14MW	Refused
4/14/2511/OF1	05/08/2015	Installation of one wind turbine	Land to south of Bell House Farm, Sandwith, Whitehaven	1	36.6	50 kW	Approved
4/15/2187/OF1	05/08/2015	Erection of a single wind turbine	Land at High Farm, Low Moresby, Whitehaven	1	74	500kW	Refused
4/15/2246/OF1	02/09/2015	Installation and operation of a single wind turbine	Stubsgill Farm, Distington	1	45.5	250kW	Refused

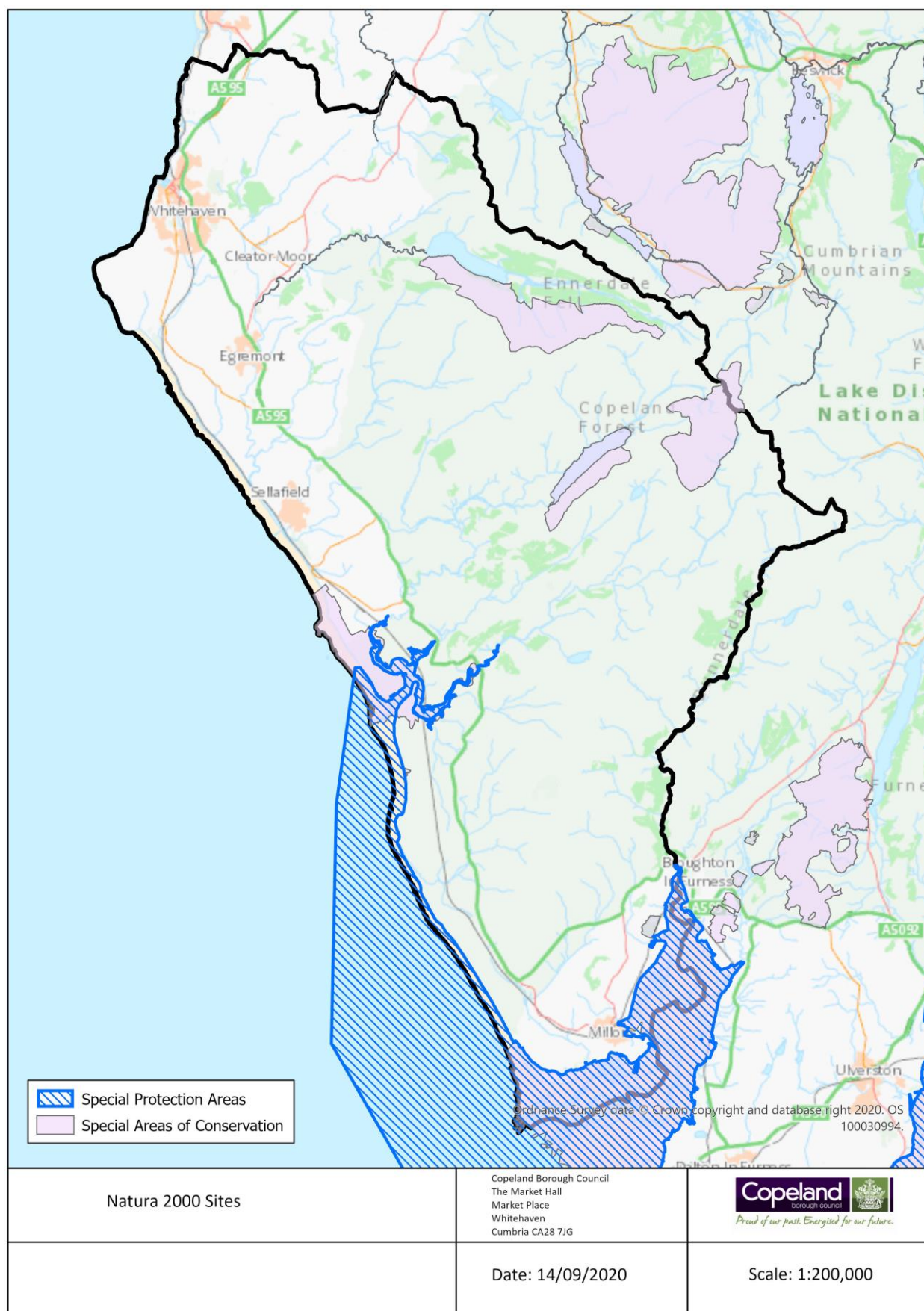
N.B. – it should be noted that some of the permitted turbines may not have been constructed

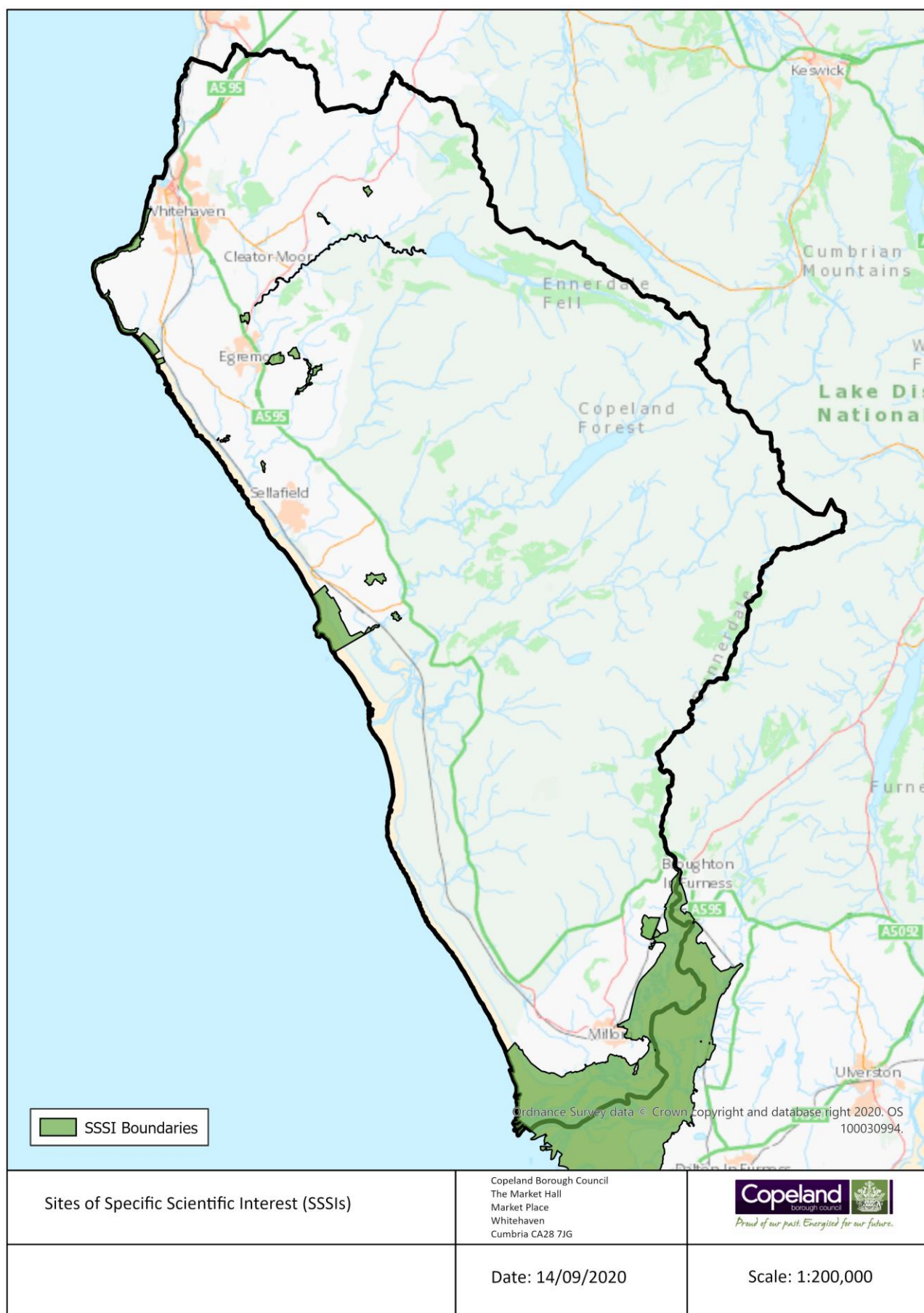
Appendix 2: Mapped constraints

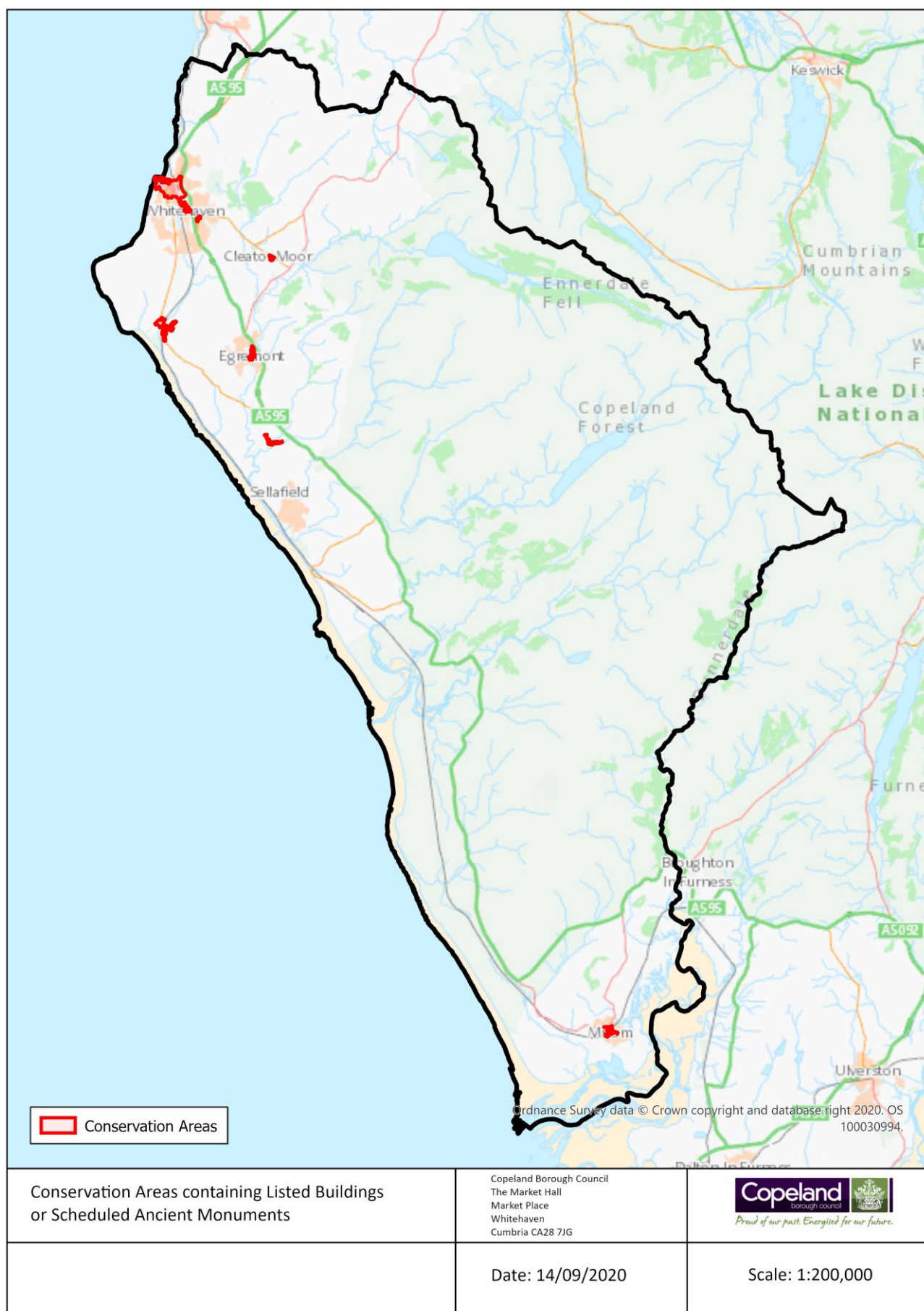


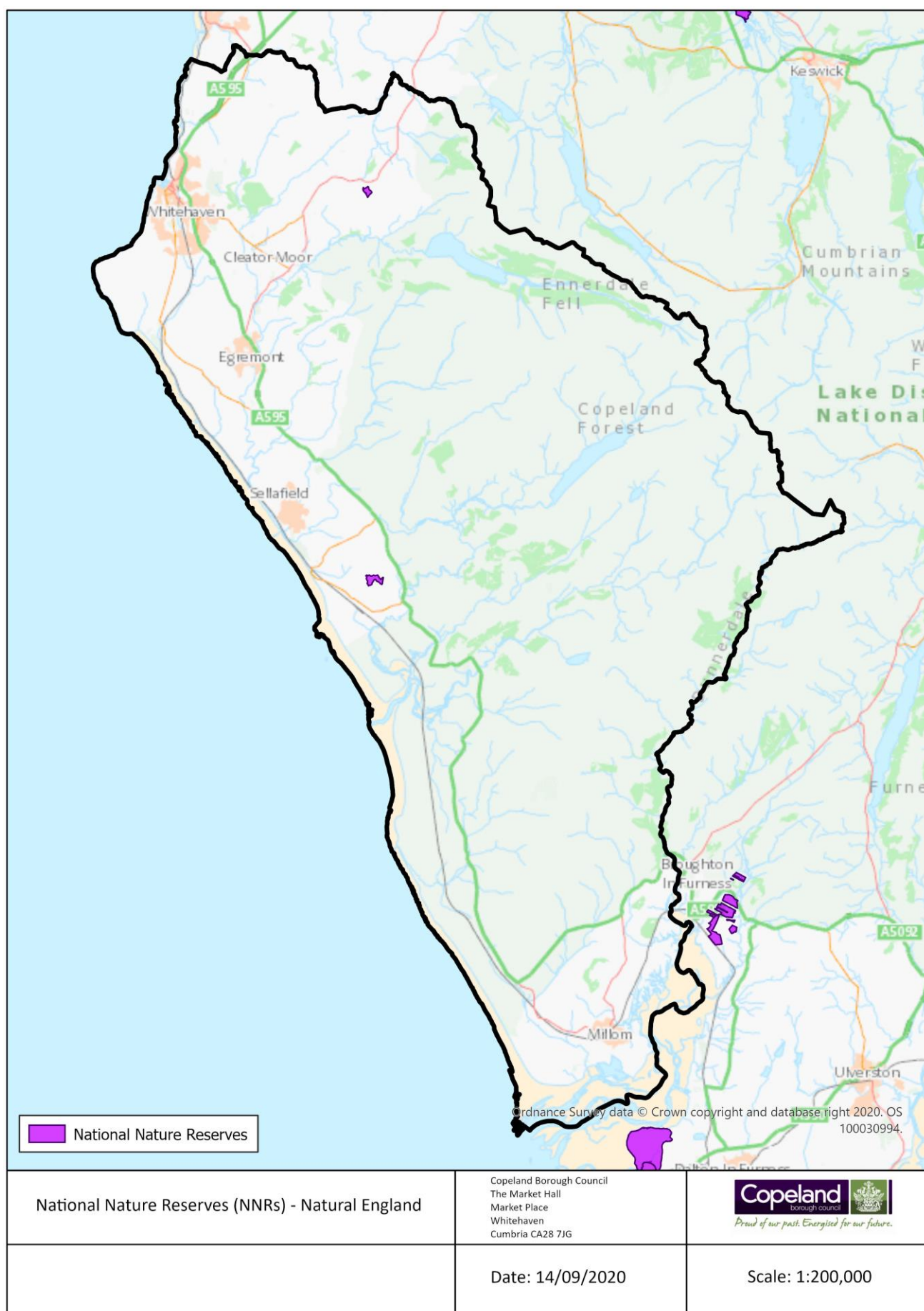


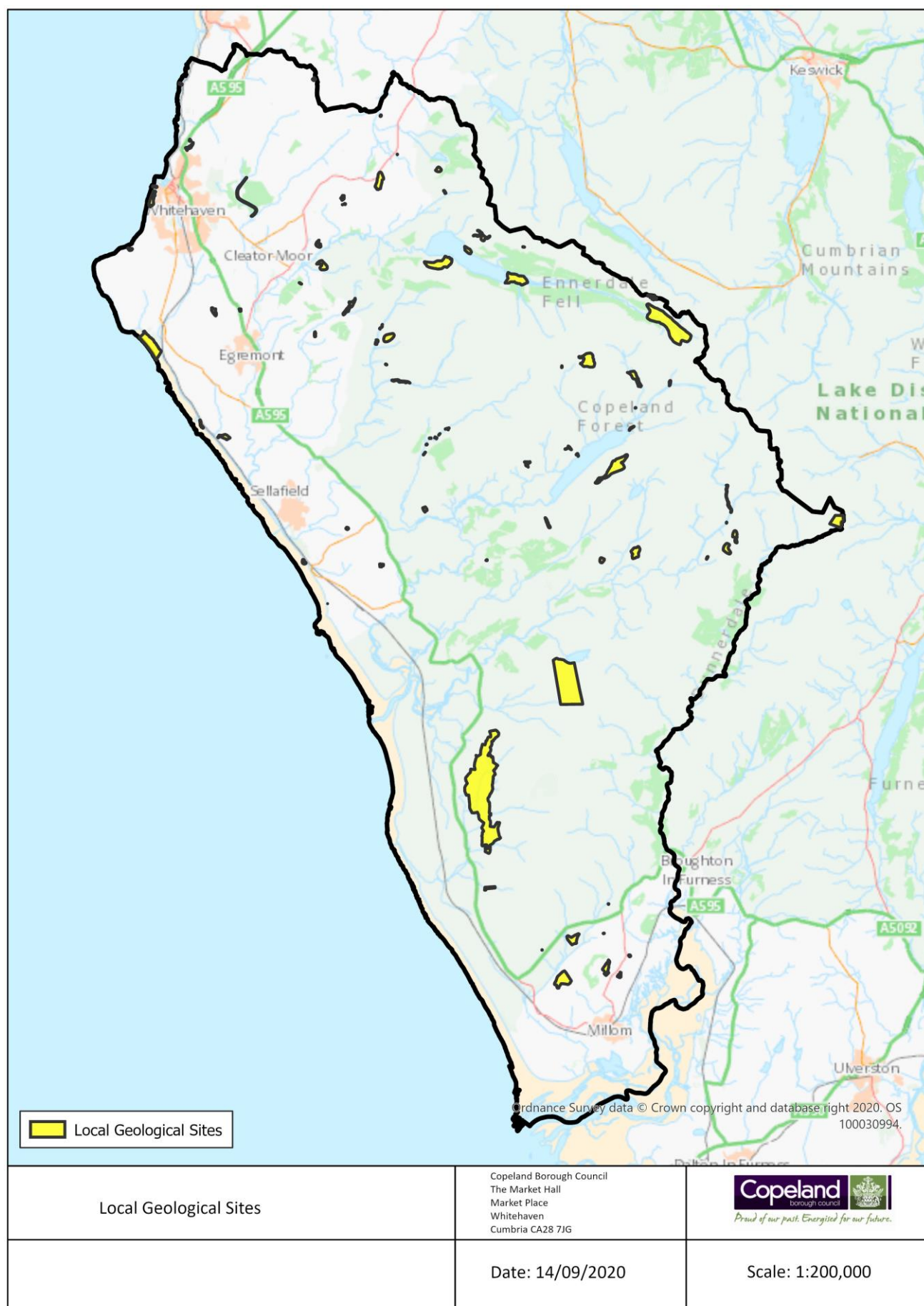
Heritage Coast	Copeland Borough Council The Market Hall Market Place Whitehaven Cumbria CA28 7JG	 <i>Proud of our past. Energised for our future.</i>
	Date: 14/09/2020	Scale: 1:200,000

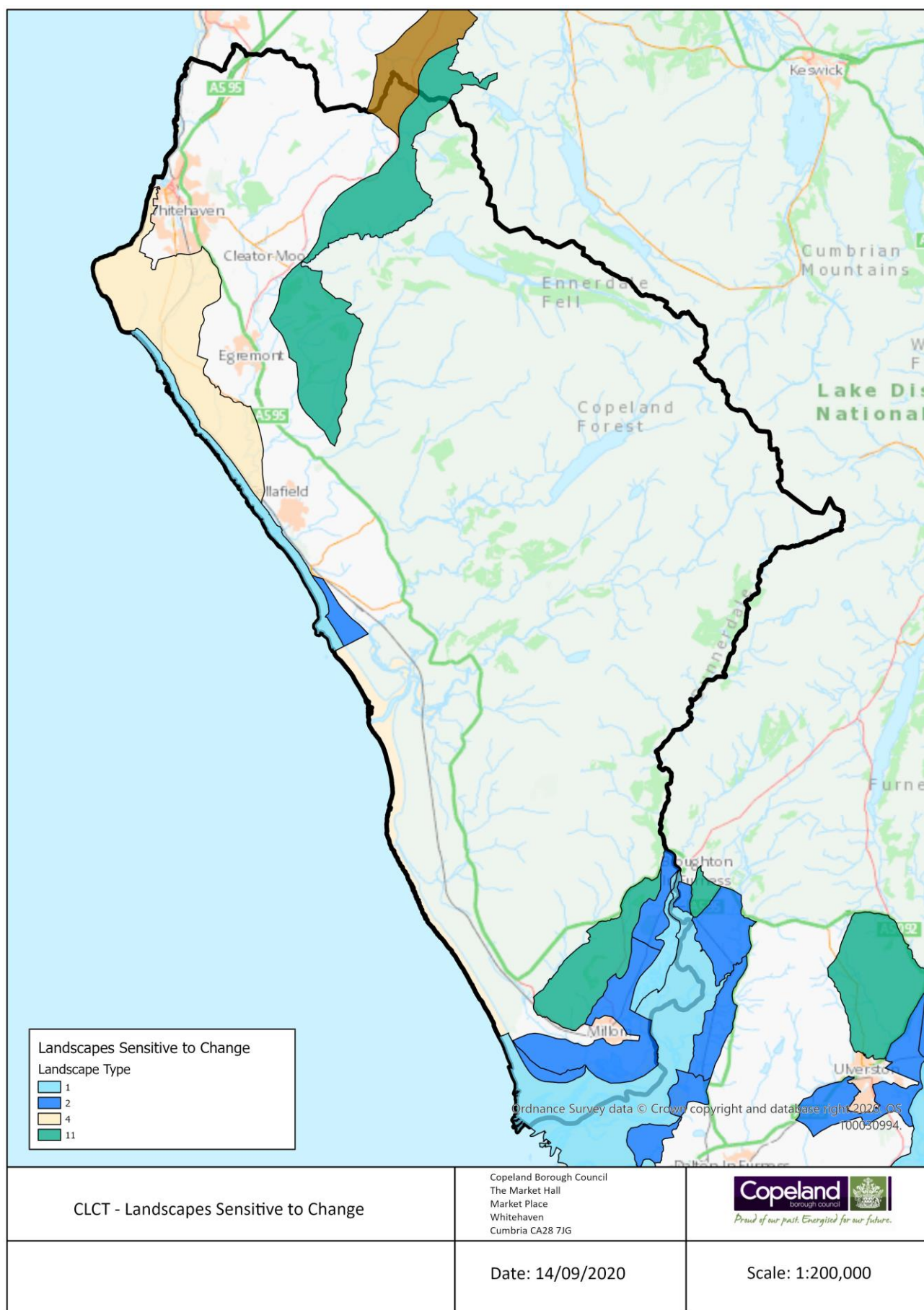
















Appendix 3: Details of Landscape Character Areas (Cumbria Landscape Character Guidance)

Landscape Character Type	Sensitive Characteristics or Features	Link to full Landscape Character Details
1. Estuary and Marsh ²⁶	The largely undeveloped horizons, naturalness and tranquillity of the wide open seas and mudflats contribute to its sensitivity. Daily inundation provides a feeling of wildness and remoteness which is sensitive to man-made development. Nature conservation and birds reinforce the naturalness of area and is sensitive to significant changes in management and use. The large and expansive backdrop of the Lakeland and Scottish fells add to the drama of the area.	https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/4065115218.PDF
2. Coastal Margins	The wildness and high ecological value of the sand dunes and dune grassland are likely to be sensitive to coastal dynamics, shoreline management responses and changes in management regimes. The small scale traditional coastal villages and farms are sensitive to medium to large scale expansion of modern housing and industry. The open and expansive views to a largely undeveloped horizon both inland and offshore are sensitive to large scale wind energy development. The feeling of tranquillity arising from 'naturalness' of the landscapes is sensitive to unsympathetic development and noisy land uses. The organic form and line along the coastal edge could be sensitive to hard realignment and changes in sea level and coastal dynamics.	https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/4065115320.PDF
3. Coastal Sandstone	The dramatic cliffs of St Bees Heritage Coast, their colonies of breeding sea birds that provide a strong link with the open sea and sense of 'naturalness', and the discrete siting of the railway line along the lower coastal edge are all sensitive to the dynamic forces of the sea. The networks of native hedges are sensitive to changes in land management and farm diversification. Discrete settlements, the distinctive sandstone of traditional buildings and fossilised medieval strip fields are sensitive to village expansion.	https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/4065114150.PDF

²⁶ This is the title used in the Cumbria Wind Energy Supplementary Planning Document, 2007. This landscape character type is now referred to as Bay and Estuary.

Landscape Character Type	Sensitive Characteristics or Features	Link to full Landscape Character Details
5 Lowland	The peaceful pastoral atmosphere away from busier parts is sensitive to large scale development. Native broadleaved woodlands, shelterbelts and remnant parklands, species rich hedges and hedge banks, and the interest they provide to the farmed landscape, are sensitive to changes in land management. Discrete and dispersed farmsteads are sensitive to unsympathetic expansion. Ridge top locations of settlements are sensitive to village expansion. Undeveloped areas of ridge tops and valley rims are sensitive to large scale ridge line development where significant contrast could arise between small scale settlements and large scale features such as large scale wind turbines and pylons. Open and uninterrupted views from ridge tops to the Solway Firth and Lakeland Fells are sensitive to large scale infrastructure development.	https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/4065114319.PDF
9. Moorland Hills and Low Plateaus	The open character and expansive views across moorland and higher farmed areas are sensitive to large scale infrastructure development that could obscure or significantly interrupt the views. The small wooded valleys and shelterbelts that intersperse the open moorland and farmland are sensitive to changes in land management. The species rich hedgerows and wet mossland and flushes that provide biodiversity interest away from moorland and the archaeological remains and earthworks that provide cultural interest are sensitive to changes in land management. Contrast of rough moorland with improved pasture provides interest and is sensitive to changes in land management	https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/40651143947.PDF
11 Upland Fringes	The strong matrix of stone walls and hedges provide a framework to the improved and semi improved pasture. Wooded ghylls, woodland and hedgerow trees provide interest and support biodiversity. These are sensitive to changes in land management. Farmsteads and villages are discrete and dispersed and follow the grain of the rolling topography and are sensitive to unsympathetic expansion and redevelopment. Rural roads connect farmsteads and settlements following the flow of the topography and are sensitive to highway safety improvements or access to new developments. The remote, peaceful and rural farmland is sensitive to additional large scale coniferous plantations. The contrast in scale with Pennine Scarps and Lakeland Fells and more intimate farms and woodland are sensitive to large scale infrastructure development.	https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/40651144644.PDF

Landscape Character Type	Sensitive Characteristics or Features	Link to full Landscape Character Details
12. Higher Limestone	<p>The limestone vernacular from field walls, lime kilns and traditional farm and village buildings is sensitive to changes in land management and new development patterns and materials. Species rich hay meadows and roadside verges, and the matrix of walls that reinforce the rolling landscape grain and varied historic field patterns are sensitive to changes in land management. Small, traditional villages, with a rural character and village greens are sensitive to village expansion. Discrete rural roads winding along contours are sensitive to highway improvements. Archaeological remains and historic farm buildings and features are sensitive to changes in landscape management and village/farmstead expansion. Long open views to the Fells, Pennines and Howgills are sensitive to large scale and prominent development that could significantly interrupt views.</p>	<p>https://cumbria.gov.uk/elibrary/Content/Internet/538/755/2789/40651144950.PDF</p>

Appendix 4: Consultee responses to previous drafts of the Local Plan relating to wind energy developments

Local Plan Stage	Consultee Comment	CBC Comment
Preferred Options	<i>“For specific...the wind energy suitable areas (as above) the loss of supporting habitat for Hen Harrier needs to be assessed. There is evidence that some of the Hen Harriers which winter in Copeland area breed on SPAs in the North of England and the Isle of Man. West Cumbria Hen Harriers are therefore functionally linked to these SPAs. The ... wind farm proposals in this area should also be accompanied by a project HRA to address potential impacts. As above this section should outline an overview of the mitigation measures that would ensure no adverse effect on site integrity.”</i>	<p>The impact of turbines on habitats and species will be addressed at planning application stage when more information regarding the exact location, size and design of the turbine is available.</p> <p>The impact of the Local Plan policy which identifies the Suitable Area has been subject to HRA.</p>
Preferred Options	<i>“We are writing to object to the local plan consultation with the following points: Wind energy developments being marked in the green (favourable area) on the land between Drigg Holmrook Seascale and Gosforth. This area is the setting of the national park now a world heritage site. This area should be in the national park. It has wide ranging views into the national park of 180degrees taking in all of western lake District fells and from within the park gives expansive views out to the coast and the sea. Blighted by one ugly horrendous wind turbine which should never have been allowed and to which the council made the entirely wrong decision. To the detriment of residents who see the thing from Holmrook Drigg and Seascale as well as looking into it out of the national park. The current local plan says tall structures should NOT be looked upon favourably in this area so I don't see why that should change as it is now a buffer zone for a word heritage site. The Drigg village plan which stands shows around 74% of residents do NOT support wind turbines in the area. Our Drigg parish newsletter a few years ago stated we were to have a consultation to be included in the expansion of the national park. This did not happen. An utter disgrace that that consultation was not carried out and a missed opportunity to protect one of the most beautiful areas in the western Lake District. This should now be</i>	<p>The Council is required by Government to identify a Suitable Area for Wind Energy. Such developments can help mitigate climate change. The decision regarding whether to extend the National Park is made at a national level and not by the Borough Council.</p> <p>The Cumbria Landscape Character Guidance and the Copeland Landscape Character Assessment both indicate that there is some scope for sensitively located and designed wind energy developments.</p> <p>The area referred to falls into Cumbria Landscape Character Type 5b (low farmland). The Cumbria LCA states that “Energy infrastructure including nuclear and large scale wind energy generation...should be carefully sites and designed to prevent this sub type becoming an energy landscape. Prominent locations should be avoided and appropriate mitigation should be included to minimise adverse effects.”</p>

Local Plan Stage	Consultee Comment	CBC Comment
	<p><i>taken forward and put to a public consultation. Questions should be asked as to why it wasn't and who benefits from that not happening. Councillors in this area should represent the community opinion. There was a very clear opinion of objection for all three wind turbine applications from local residents who live in and around the area of land between Drigg Holmrook Seascale and Gosforth. Landowners or councillors who support wind turbines should be looking directly at them from their own home. This land should be removed from any tall infrastructure development."</i></p>	<p>The Copeland LCA splits sub-area 5b into several smaller sub-areas. The area referred to is covered by sub-area 5B iv (Beckermest to Drigg low farmland) which is identified as having a medium overall sensitivity. It states <i>"Regardless of existing energy development, including wind turbines and pylons, the low lying, relatively open nature of the Character Area and visual connection to the National Park means the area is sensitive to potential further wind turbine or solar array development. Sporadic development of turbines should be avoided. Where necessary, turbines should be located in visual association with existing large-scale infrastructure rather than in less disturbed areas, should avoid prominent locations, incorporate appropriate mitigation wherever possible, and take into account views from the National Park. The central portion of the Character Area with increased containment from tree cover, may be less sensitive to solar arrays, than the more open landscapes towards the coast and the immediate setting to the National Park to the east, subject to detailed landscape assessment."</i></p> <p>All wind energy developments will require a planning application regardless of whether they were located in the Suitable Area and consideration will be given to both documents referred to above when assessing the merits of the application. If the impact upon the landscape is considered to be unacceptable and not compliant with the relevant planning policy then planning permission will be refused.</p>
Preferred Options	<p>I am writing to express my concern that the local plan does not protect out visual amenity enough. The area between Drigg Holmrook Seascale and</p>	<p>See comments above.</p>

Local Plan Stage	Consultee Comment	CBC Comment
	<p>Gosforth should be protected from any tall infrastructure such as wind turbines and huge pylons. This area should be in the national park really due to the open panoramic vista of the western lake District fells, it isn't but it is the setting for the national park and also provides fantastic views from inside the national park looking out to sea as much as it does looking into the national park. It is now a buffer zone to a world heritage site. It should be included in the undeveloped coast. The existing wind turbine is a total blight on the landscape. Should never have been granted permission, the planning application visual impact pictures were completely wrong and did not represent where it would be seen from at all. You got it so wrong. There is no need in our area for any onshore wind turbines. There is more than enough out at sea. And we have Sellafield, so I think Copeland has done its bit for eyesores on the beautiful countryside. Any national grid upgrade associated with moorside should be out at subsea cable or underground. With regards to the national grid upgrade in the Drigg area. It is not acceptable to underground half the village then put huge great pylons in front of the other half of the village (stubble green).</p>	
Preferred Options	<p>The Map at Appendix H indicates an area as Overall Suitable Location for Wind Energy. Much of the northern section overlaps with an area known to support Hen Harriers and a variety farmland birds such as curlew. This needs to be assessed in the accompanying Plan level HRA. At the project level suitable bird surveys would need to be undertaken before wind energy developments could be consented here. The Southern area on the map west of Millom would also require bird surveys and HRA due to the functional linkage and bird flightpaths around the SPA margins.</p>	<p>This Technical document, which the Local Plan draws developer's attention to, highlights that surveys may be required at planning application stage.</p> <p>The impact of turbines on habitats and species will be addressed at planning application stage when more information regarding the exact location, size and design of the turbine is available.</p>
Preferred Options	<p>Disagree that this Policy should be screened out (of HRA). The Map at Appendix H indicates an area as Overall Suitable Location for Wind Energy. Much of the northern section overlaps with an area known to support Hen Harriers and a variety farmland birds such as curlew which are SPA species.</p>	<p>See comment above. The impact on former Natura 2000 species has been considered through the Local Plan HRA.</p>

Local Plan Stage	Consultee Comment	CBC Comment
	Therefore this needs assessing the Plan HRA and reference to a requirement for project HRA's that would need to be undertaken before wind energy developments could be consented here. The Southern area on the map west of Millom would also require bird surveys and HRA due to the functional linkage and bird flightpaths around the SPA margins	
Preferred Options	The Wind Energy Technical Document should be updated to take into account the current character and capacity of the landscape and consider a wider range of factors including residential amenity and existing and consented wind farm developments. The Representation Site (Haverigg III Wind Farm) should be identified as an area suitable for wind energy development within the Wind Energy Technical Document. (Please refer to Representation Statement and supporting documents for further information)	An additional point has been added to the relevant Local Plan policy to allow for the potential repowering of turbines in unsuitable areas providing the impacts are considered acceptable on a case by case basis. Applicants are advised in the Local Plan to consider this Technical Document which lists which potential constraints will be considered at application stage.
Preferred Options	May I recommend further research is carried out to establish the true costs of your initial preferred option. I also ask you to consider the impact on wild-life and also how many sustainable jobs will be created from this, when the turbines will be manufactured abroad and likely installed by the same supplier, with minimal local short-term jobs during the installation process. In contrast greater support for the Whitehaven coal mine would create up to 500 sustainable jobs, with minimal impact on wildlife.	<p>The Government requires local authorities to identify suitable areas for wind energy in their Local Plans regardless of how many jobs such developments may create. The Suitable Area has been informed by this Technical Document which has been updated in 2021 to ensure that the least sensitive areas of the Borough are excluded from the Suitable Area.</p> <p>The Council is required to provide proportionate evidence to support the Local Plan. Consideration of how many jobs could be provided through wind energy developments and where they would be manufactured is not considered to be proportionate or necessary.</p>
Preferred Options	Object to proposed location South Copeland Laca/ Kirksanton/Haverigg. Laca designated Landscape of County Importance. Laca forms one side of Whicham valley which is split by LDNP boundary. It is currently proposed for inclusion in the Southern Boundary LDNP Extension review. Laca contains high concentration of Ancient Scheduled Monuments in a small area which	The Landscape Character Assessment which informs this Technical Document has given consideration to the impacts of any development on the setting of the National Park and takes into account the Landscape Character Assessment produced by Alison Farmer Associates to support the Lake

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	<p>relate historically with Standing Stones at Kirksanton, Swinside Stone Circle and Black Combe. Previous small scale wind energy applications in this location have been refused because of the high visual and cultural heritage impact they would have for the local communities, LDNP, and from across the Duddon Estuary. The triangular area nearer to the coast highlighted in the vicinity is located on a natural flood plain for Kirksanton Pool/River Lazy which acts a sponge during heavy rain. There already exists a small cooperatively owned wind farm nearer to Haverigg which has been granted an extension to it's 25 year lease. There may be Grid issues regarding capacity for larger scale wind energy developments. The proposed location is on a narrow coastal plain where any such scheme will have major impact on the community. The landscape character assessment has not taken into account the heritage of Kirksanton [pre Doomsday Book] its relationship with Lacra, and it's view point from the coast inland.</p>	<p>District boundary extension.</p> <p>The Cumbria Landscape Character Guidance document and the Copeland Landscape Character Assessment both indicate that there is some scope for sensitively located and designed wind energy developments with some parts of the landscape character area being more sensitive than others.</p> <p>The Kirksanton/Haverigg area referred to falls into Cumbria Landscape Character Type 5b (low farmland). The Cumbria LCA states that <i>"Energy infrastructure including nuclear and large scale wind energy generation...should be carefully sites and designed to prevent this sub type becoming an energy landscape. Prominent locations should be avoided and appropriate mitigation should be included to minimise adverse effects."</i> The Lacra area is outside the Copeland Local Plan area, within Landscape Character Type 11.</p> <p>The Copeland LCA splits sub-area 5b into several smaller sub-areas. The Kirksanton/Haverigg area falls within sub-area 5Bv (Kirksanton Low Farmland). The LCA identifies that this area has a medium-high overall sensitivity and notes: <i>"Despite the presence of turbines nearby at the former airfield, the open low farmland has high sensitivity to development of large wind turbines given the sensitive position of this Character Area set between the National Park adjacent to the west and north-west, prominent foothills adjacent to the north-east, the undeveloped coast to the south-west and more developed areas to the south-east."</i></p>

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		<p>All wind energy developments will require a planning application regardless of whether they were located in the Suitable Area and consideration will be given to both documents referred to above when assessing the merits of the application. If the impact upon the landscape is considered to be unacceptable and not compliant with the relevant planning policy then planning permission will be refused.</p>
Preferred Options	<p>We are disappointed to note that the Council's Wind Energy Technical Document has not considered the extension area to the Heritage Coast in establishing Areas Suitable for Wind Energy Development (paragraph 6.13). The extension area was established following extensive landscape assessment work, which was undertaken in consultation with Natural England. As noted elsewhere in our response, the Council has already committed to this extension. We therefore consider that sign off by Natural England is a formality, and that significant material weight should be given to the extension area. The extension area also acts as a buffer to the existing defined Heritage Coast. Notwithstanding the extension, we do not consider that an area in such close proximity to the existing defined Heritage Coast should be identified as an Area Suitable for Wind Energy.</p>	<p>The Suitable Area for Wind Energy has now been updated to exclude the Heritage Coast extension area. The Council will continue to work with Natural England to ensure the extension area is formally defined.</p>
Preferred Options	<p>I am writing to OBJECT to the area roughly between Gosforth, Seascale, Drigg and Holmrook (ringed in red on the figure overleaf) being designated as potentially suitable for wind turbine development for the following material Connection to adjacent landscapes – adjacent to Lake District National Park and Drigg dunes SSSI and Halsenna Moor national nature reserve - HIGHLY SENSITIVE Ecology – adjacent to Drigg dunes SSSI and Halsenna Moor national nature reserve and Wild Bird General License Zone - HIGHLY SENSITIVE Remoteness and tranquillity – tranquil area close to coast use by people for recreation and tourism. Numerous businesses in area rely</p>	<p>The Cumbria Landscape Character Guidance document and the Copeland Landscape Character Assessment both indicate that there is some scope for sensitively located and designed wind energy developments with some parts of the landscape character area being more sensitive than others.</p> <p>The area referred to falls into Cumbria Landscape Character Type 5b (low farmland). The Cumbria LCA states that “<i>Energy infrastructure including nuclear and large scale wind energy</i></p>

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	<p>on tourism. – HIGHLY SENSITIVE Skyline and visual amenity Stretch of B5433 between Seascale and Drigg and numerous public rights of way – panoramic view of Lake District fells – HIGHLY SENSITIVE Historic environment / Frontiers of Roman Empire – close to / visible from Gosforth (Viking settlement) and Ravenglass (Roman settlement / Roman bathhouses)</p> <p>MODERATELY SENSITIVE Please see Figure below showing map with ringed area in red and points A, B and C. Following figures show panoramic views of landscape taken from points A, B and C illustrating the remoteness, tranquillity and connection to local landscapes .</p>	<p><i>generation...should be carefully sites and designed to prevent this sub type becoming an energy landscape. Prominent locations should be avoided and appropriate mitigation should be included to minimise adverse effects."</i></p> <p>The Copeland LCA splits sub-area 5b into several smaller sub-areas. The area referred to is covered by sub-area 5B iv (Beckermest to Drigg low farmland) which is identified as having a medium overall sensitivity. It states "<i>Regardless of existing energy development, including wind turbines and pylons, the low lying, relatively open nature of the Character Area and visual connection to the National Park means the area is sensitive to potential further wind turbine or solar array development. Sporadic development of turbines should be avoided. Where necessary, turbines should be located in visual association with existing large-scale infrastructure rather than in less disturbed areas, should avoid prominent locations, incorporate appropriate mitigation wherever possible, and take into account views from the National Park. The central portion of the Character Area with increased containment from tree cover, may be less sensitive to solar arrays, than the more open landscapes towards the coast and the immediate setting to the National Park to the east, subject to detailed landscape assessment."</i></p> <p>All wind energy developments will require a planning application regardless of whether they were located in the Suitable Area and consideration will be given to both documents referred to above when assessing the merits of the application. If the impact upon the landscape is</p>

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		considered to be unacceptable and not compliant with the relevant planning policy then planning permission will be refused.
Preferred Options	<p>We consider amendments are needed within this policy to take ensure the Outstanding Universal Value of the two World Heritage Sites within the borough is adequately protected. Whilst the plan area lies beyond the boundary of the English Lake District World Heritage Site, structures such as wind turbines are capable of substantial harm to its setting, particularly from cumulative impacts. To protect other elements which contribute to the historic environment within the Borough we also consider that mention should be given to historic landscape character and the setting of heritage assets. Paragraph 194 of the NPPF states that “any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.” Paragraphs 195 and 196 of the NPPF concern harm and public benefit, in the case of substantial harm to (or total loss of significance of) a designated heritage asset there is a requirement for substantial public benefits to outweigh the harm, whilst in the case of less than substantial harm of a designated heritage asset it will be important that this harm is weighed against public benefit. The order of the policy, currently puts mitigation prior to this consideration, we therefore advise amendments to the following paragraph “Where harm is unavoidable, the planning application must include details of mitigation measures proposed in order to overcome or reduce such harm” in order to align with the NPPF and the need to balance public benefits before reducing and mitigating harm.</p> <p>Evidence Base</p> <p>We have concerns over the proposed methodology for a buffer zone of 250m around the World Heritage Sites of the English Lake District and Frontiers of the Roman Empire. We would therefore request that a more detailed assessment is undertaken to determine areas of suitability in the</p>	<p>Wording changes made to Local Plan policy as suggested.</p> <p>Impacts on heritage assets and archaeology added to the list of constraints that are considered at planning application stage in paragraph 6.5 above.</p>

Local Plan Stage	Consultee Comment	CBC Comment
	<p>context of the setting of these two World Heritage Sites to prevent adverse effects to their Outstanding Universal Value. Historic England recognises the value of wind energy in addressing climate change and providing clean energy. However, we advise against the use of a standard distance to create a buffer zone around identified heritage assets, as impacts on setting vary according to topography and the characteristics of the asset and its surroundings.</p> <p>Wind energy development can also have an impact on sites of archaeological interest which is not currently assessed as part of the policy. We would welcome the opportunity to work with the Council in provision of a more developed evidence base concerning the suitability of areas for wind energy that incorporates a more detailed understanding of impact on heritage assets including the Outstanding Universal Value of the two World Heritage Sites. Amend first bullet point to read Landscape character including historic landscape character; Amend bullet point 8 to read Heritage assets and their setting; Add additional bullet point: The Outstanding Universal Value of the English Lake District World Heritage Site and the Frontiers of the Roman Empire (Hadrian's Wall) World Heritage Site. Amend paragraph "Where proposals would result in significant adverse effects, proposals will only be accepted where this is outweighed by the wider environmental, economic, social and community benefits and in the case of the historic environment balanced against public benefit as per national policy. Where harm is unavoidable, the planning application must include details of mitigation measures proposed in order to overcome or reduce such harm. Where significant adverse effects remain, proposals will only be accepted where this is outweighed by the wider environmental, economic, social and community benefits</p>	
Preferred Options	The Wind Energy Technical Document should be updated to take into account the current character and capacity of the landscape and consider a wider range of factors including residential amenity and existing and	Wording changes have been made to the Local Plan policy which allows for the potential repowering of turbines outside the suitable area. This will be assessed on a case by case basis

Local Plan Stage	Consultee Comment	CBC Comment
	consented wind farm developments. The Representation Site (Haverigg II Wind Farm) should be identified as an area suitable for wind energy development within the Wind Energy Technical Document. Please refer to Representation Statement and supporting documents for further information.	
Preferred Options Re HRA	Disagree that this Policy should be screened out. The Map at Appendix H indicates an area as Overall Suitable Location for Wind Energy. Much of the northern section overlaps with an area known to support Hen Harriers and a variety farmland birds such as curlew which are SPA species. Therefore this needs assessing the Plan HRA and reference to a requirement for project HRA's that would need to be undertaken before wind energy developments could be consented here. The Southern area on the map west of Millom would also require bird surveys and HRA due to the functional linkage and bird flightpaths around the SPA margins	<p>The HRA has been updated in light of comments received.</p> <p>The impact of turbines on habitats and species will be addressed at planning application stage when more information regarding the exact location, size and design of the turbine is available.</p>
Preferred Options	We have the iconic Church on the brow of the hill, 2 listed buildings (Drigg Hall & Rose Cottage) where incidentally the Meadowbrook (Southerly) development would sit between. As well as the Gables, The Meadows (Georgian property dating back to 1810). There are individual designed houses interspersed either side of the roadside with a pavement running down one side of the village. It is quiet, rural and if you read the 2016 Community Plan, that is why most current residents moved here... The wind turbines and allocation in the local area as some of the land has not been ruled out of being inappropriate for this use. Is there any further information available in regard to the plans for wind turbines in this area? Any further installations of wind turbine farms in the area would not be welcome by residents with no land to rent out, it would spoil the views of the fells – it would be like looking out to the Solway Firth.	<p>Impacts on heritage assets and archaeology added to the list of constraints that are considered at planning application stage in paragraph 6.5 above.</p> <p>The impact on views from private properties is not a material planning consideration. The impact on wider key public views has been considered through the SLCA and LCA, both of which have informed the Suitable Area and will also be taken into consideration when determining a planning application.</p>
Pre-Publication	Strongly object to the land between the B5433 and A595 being designated for wind turbine development. This will urbanise a rural area, affect the outstanding views to the National Park and would not be in keeping with the	Parts of the Suitable Area for Wind Energy are more sensitive than others. More information is contained in the Council's SLCA and LCA, both of which will be taken into consideration

Local Plan Stage	Consultee Comment	CBC Comment
	character of the village. Previous plans said this area was sensitive to tall infrastructure - what has changed?	when determining a planning application. If the development would result in unacceptable landscape impacts, and was found to be contrary to the relevant planning policy, than permission will be refused regardless of whether the turbine is within a Suitable Area or not.
Pre-Publication	Some of the land in the area has not been ruled as being inappropriate for wind turbine development. Is there any further information available in regard to the plans for wind turbines in the area? Any further turbines would spoil the views of the Fells and would not be welcomed by residents	Private views are not a material planning consideration. The impact upon key, wider, public views is taken into account in the Council's SLCA and LCA, both of which will be taken into consideration when determining a planning application. Details regarding the exact location, size and design would be included in any future planning application, should one be submitted.
	Where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Local Authorities are required to consult the MOD where a proposed turbine has a tip height of or exceeding 11m or has a rotor diameter of 2m or more.	Additional wording has been added to this Technical document to reflect this.