



Defence Infrastructure Organisation

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Your reference: 4/24/2334/0F1

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Heather Morrison
The Market Hall
Market Place
Whitehaven
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CA28 7JG

19 March 2025

By email only

Dear Heather,

Application Reference: **4/24/2334/0F1**
Site Name: **Highfield Farm Wind Turbine Repowering**
Proposal: **Removal of Existing Wind Turbine and Erection of Replacement Wind Turbine, up to 76m Blade Tip Height, with Associated Development. Additional and updated information.**
Site address: **Highfield Farm, Bigrigg, Egremont.**

Thank you for consulting the Ministry of Defence (MOD) on the additional and updated information submitted in support of the above planning application through your communication dated 5 March 2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This consultation specifically responds to a number of clarifications requested by the LPA. For ease of reference the points of clarification have been set out below:

- i. Output of the proposed turbine – the LPA has requested an explanation on what this would be when compared against the existing turbine on the site.

- ii. Consideration of a smaller turbine – the LPA has set out ‘assuming there is no proposed significant increase in output, is there scope to consider replacement with a smaller turbine with similar increase in efficiencies’.
- iii. Biodiversity Net Gain – the LPA has requested an accompanying statement for the submitted metric to explain what the metric shows.
- iv. The New Copeland Local Plan – the new Local Plan was formally adopted by Cumberland Council on 5th November 2024. The LPA has requested that the Addendum assesses the proposals against the policies in the New Local Plan.
- v. Coronation Terrace and adjacent Springbank, Low Walton and High Walton – the LPA has identified that these residential receptors may be affected by the Proposed Development in respect of proximity, views to the rear, noise and shadow flicker. The LPA has also requested assessment of a further representative viewpoint from this location.
- vi. Noise and Shadow Flicker assessments – the LPA has requested that these documents are revisited in case there are inconsistencies in the planning documentation, as well as to provide more clarity on what is assessed and any likely impacts.
- vii. Benefits of the Scheme - whilst the LPA notes that it is not a requirement for the Applicant to demonstrate the overall need for the development (para 168 revised National Planning Policy Framework (NPPF)) the LPA has requested that the Applicant sets out the ‘associated benefits’ of the repowering scheme, noting that the NPPF refers to over and above the existing, and its contribution to net zero.

It is understood that the additional information does not seek to amend either the location or dimensions of the proposed turbine.

The MOD previously responded to consultation on this application with a letter to Cumberland Council dated 8 November 2024. The MOD position remains that, subject to conditions relating to aviation safety lighting, and charting data being applied to any consent that might be issued, the MOD has no objection to the scheme. A copy of the letter dated 8 November 2024, which sets out in greater detail the reasons for those conditions and condition wordings is sent with this letter for your convenience.

The MOD must emphasise that the advice provided within this letter is in response to the information detailed in the developer’s documents, “Appendix B - Existing Wind Turbine Power Curve - Additional Information February 2025”, “Appendix C - Proposed Turbine Power Curve - Additional Information February 2025”, “Appendix D - Noise Assessment - Additional Information February 2025”, “Appendix E - Updated Shadow Flicker Report - Additional Information February 2025”, “Figure 1 Coronation Terrace and Adjacent Properties - Additional Information February 2025”, “Figure 2.1 Coronation Terrace (Existing) - Additional Information February 2025”, “Figure 2.2 Coronation Terrace (Proposed) - Additional Information February 2025” and “Figure 3 Low Walton (Existing/Proposed) - Additional Information February 2025”. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I hope this adequately explains our position on the matter. Further information about the effects of wind turbines on MOD interests can be obtained from the following website:

MOD: <https://www.gov.uk/government/publications/wind-farms-ministry-of-defence-safeguarding>

Yours faithfully,

Andy White

Andy White
Assistant Safeguarding Manager