Landscape and Visual Assessment - Review

For

Beckermet Wind Turbine

Prepared for

Cumberland Borough Council

Prepared by

Galpin Landscape Architecture

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1 INTRODUCTION

Introduction

1.1 The purpose of this Landscape and Visual Review is to provide an independent review of the baseline conditions and the assessments presented in the original LVIA.

1.2 This Review considers the submitted *Landscape and Visual Impact Assessment* (LVIA): *Land West of The Energy Coast Business Park – Wind Turbine Repowering* which was prepared by Locogen in November 2023.

1.3 Galpin Landscape Architecture has been appointed by Cumberland Council to prepare this independent report.

The Proposal

1.4 The application is for the re-powering of an existing 46.5m high (to blade tip) wind turbine which has been in operation since 2015. This will involve replacing it with a taller 3 blade wind turbine measuring 77m high (to blade tip) along with associated infrastructure for a further period of 30 years.

1.5 The Proposed Development Site is located National Grid Reference (NGR) NY 02329 08344 with the initial expectation being that any new turbine would be located within c.20m from the existing turbine to allow for construction to take place alongside operation of the existing turbine to minimise operational downtime. It is sited adjacent a pre-existing industrial park associated with the West Cumbria Energy Coast.

The Review and Methodology

1.6 This review has been undertaken following the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (2013) and the Landscape Institute in their Technical Guidance Note 1/20 issued in January 2020 - Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs).

1.7 The review report has been completed following a site visit in June 2024. The purpose of the site visit was to verify baseline information and conduct visits to viewpoints to check the actual findings of the assessment.

References

1.8 Documents referred to include:

- *Landscape Visual Impact Assessment: Land West of The Energy Coast Business Park – Wind Turbine Repowering*, Locogen, (November 2023) (Submitted LVIA);
- *Cumbria Landscape Character Guidance and Toolkit,* Cumbria County Council, (2011);
- *Cumulative Impacts of Vertical Infrastructure Study*, Cumbria County Council (2014);
- *Copeland Wind Energy Technical Document*, Copeland Borough Council (2022);
- *Guidelines for Landscape and Visual Impact Assessment*, The Landscape Institute, 3rd Edition (2013) (GLVIA)
- *Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*, Landscape Institute Technical Guidance Note 1/20 (2020) (RLVIA)

2 REVIEW OF SUBMITTED LVIA

Review of Methodology, Criteria and Process

2.1 Current guidance from the Landscape Institute on reviewing LVIAs is Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs) Technical Guidance Note 1/20, Landscape Institute (Jan 2020). This guidance provides the following structure. The bullet letters relate to the guidance.

2.2 The structure for carrying out the review follows the guidance as per the following steps:

1. Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;

2. Checking the baseline, content and findings of the assessment;

3. Checking the presentation of the assessment findings.

Step 1: Checking Methodology, Criteria and Process

2.3 The guidance on reviewing LVIAs (RLVIA) states *'Note that the terms 'competent expert' and 'sufficient expertise' are not defined in the EIA Regulations. The Landscape Institute, in the absence of formal certification of specific competence, considers that a 'competent expert' would normally be a Chartered Member of the Landscape Institute who, has substantive experience of undertaking and reviewing LVIAs. This may be evidenced by the assessor's CV, by reference to previous assessments, and by endorsement by other senior professionals.'*

There appears to be no landscape architect involved in writing, checking or approving the report.

2.4 Furthermore, The GVLIA states that 'competent person' (P21 para 2.24) 'professional judgments must be based on both training and experience and in general suitably qualified and experienced landscape professionals should carry out landscape and visual impact assessments'

2.5 This section provides a review of the methodology, scope and process used in the assessment and how these relate to GLVIA 3. This involves reviewing the following:

2.6 *Does the scope of the assessment meet the requirements set out in the Scoping Opinion and/ or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?*

Scoping Opinion not referred to in the submitted LVIA report.

2.7 *What consultations have been carried out and have responses been acted upon?*

Submitted LVIA states VPs have been agreed with the PA.

2.8 *Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?*

Not referred to in the submitted LVIA report.

2.9 *As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?*

Yes. Methodology appears in line with best practice guidance.

2.10 *Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?*

No. Despite being separated in the Methodology laid out at the beginning of the report, there is no separate visual assessment and there is an incorporation of existing views (visual assessment) into the judgment of sensitivity of landscape receptors (Table 5).

Viewpoints have been identified and Photographs, Wirelines and Photomontages have been provided but there is no assessment of these.

Residential Properties and Route Receptors are not clearly declared as being visual receptors.

2.11 *Does the assessment demonstrate comprehensive identification of receptors and of all likely effects?*

The Lake District National Park is scoped out of the assessment. No VPs included from within the NP. Was this agreed by the PA? We would recommend at least one VP from the road to the west of Cold Fell.

Beckermet Conservation Area identified – scoped out '*due to no views or direct landscape connection of the Proposed Development Site*' (6.4.1).

The submitted LVIA appears thorough in identifying both landscape and visual receptors.

2.12 *Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?*

The assessment is not clear in its judgements and there is confusion in how the assessments have been formed.

Step 2: Review Baseline, Content, and Findings of the Assessment

2.13 This section reviews the description of the baseline, the content and the findings of the assessment. This includes the following tests:

2.14 *What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?*

The submitted LVIA correctly identifies the landscape and visual baseline conditions and is supported by good graphical information such as a ZTV and a comparison ZTV to show the additional extent of potential visibility of the proposed new height of the development.

2.15 *Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?)*

Yes. The submitted LVIA is thorough in its identification of key landscape and visual receptors.

2.16 *Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?*

The proposed methodology appears in line with best practice guidelines.

2.17 *How well is the cross-over with other topics, such as heritage or ecology, addressed?*

A separate Cultural Heritage and Archaeology assessment is referenced in the submitted LVIA. The LVIA uses the findings of this report to identify potentially sensitive receptors.

2.18 *Is there evidence of an iterative assessment-design process?*

No – the submitted LVIA does not describe any iterative design process.

2.19 *Is it clear how the methodology was applied in the assessment, e.g.: consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?*

The findings of the assessment of the submitted LVIA are not clearly presented and contains inconsistencies. For example, in the 'Overall Effect during Operation' Landscape Assessment (9.1), a "Low adverse effect" is assessed. This is not consistent with the language used in Table 3 which identifies Effects as Negligible, Minor, Moderate or Major.

2.20 *How appropriate are the viewpoints that have been used?*

The viewpoint locations cover a variety of potential visual receptors and are from varied directions.

There are issues regarding the micro-siting of the viewpoint locations which are addressed in the following table:

VP	***Receptors***	***Notes***
1	Residents	Accurate representation confirmed from viewpoint location. However, the Proposed turbine is not fully visible and the foreground context of buildings diminishes the scale of the Proposal in the photograph. Ideally would be taken from a location with full views of the turbine. In this instance a representative viewpoint nearby (e.g. Gate from road just south of Haile viewpoint (303337, 508384)) which shows what residents of Haile might see from the west-facing windows.
2	Road Users	Accurate representation confirmed.
3	Residents	This has not been taken from a publicly accessible area. Photographs and Wirelines provided appear to be produced following best practice guidance.
4	Road Users / Recreational	Accurate representation confirmed from viewpoint location. The proposed turbine is partially visible and vegetation in the foreground and midground diminish the appearance of the turbine. A more accurate representation of worst-case scenario views from this PRoW are found further north along the route (302373, 507856).
5	Road users / Residents	Accurate representation confirmed.
6	Recreational / Road Users	No verified photography or photomontages provided from this location. The location is representative of the receptors identified.
7	Road Users	No verified photography or photomontages provided from this location. The location is representative of the receptors identified. Visualisation provided in Plate 1 is not verified.

2.21 *How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?*

n/a

2.22 *What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of EIA projects?*

The tables informing the judgements of sensitivity of the landscape, residential and route receptors are thorough.

However, the description and judgment of the magnitude of change of the proposed development on receptors and the effects identified are lacking in detail and are not presented clearly.

2.23 *What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?*

The submitted LVIA provides adequate information on the proposed development at the various development stages.

2.24 *Does the document clearly identify landscape and visual effects which need to be considered in the assessment?*

2.25 The submitted LVIA identifies the potential effects of the proposed development at the various stages of development in Section 8.

2.26 *Have levels of effect have been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?*

The Proposed Development is not considered an Environmental Impact Assessment (EIA) development.

The levels of effect assessed in the submitted LVIA are not clear.

Step 3: Critique of the Presentation of the Findings of the Assessment

2.27 This section involves the examination of the presentation of the assessment and checks the findings through the following questions:

2.28 *Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects.*

The submitted LVIA clearly presents the baseline landscape and visual conditions. Also, there are clear descriptions of the sensitivity of certain receptors. However, there is a lack of transparency and clarity of communication as to how the judgments for magnitude of change and the level of effects have been reached.

2.29 *Have the findings of the assessment been clearly set out and are they readily understood?*

There is confusion in the communication of the assessments provided.

It is unclear how the sensitivities of the Residential and Route receptors have been summarised within the assessments (9.2, 9.3). Furthermore, it is not obvious how the landscape assessment has been reached.

2.30 *Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?*

Tables 5, 6 & 7 provide useful information in how judgements of the sensitivity of the receptors has been found.

It would be useful to see summary tables including the sensitivity, magnitude of change and the level of effects for the receptors identified.

2.31 *Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?*

Yes – The Viewpoint location plan, ZTV, comparative ZTV and viewpoints including the wirelines and photomontages are effective.

2.32 *Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards?*

The graphics of the submitted LVIA appear to follow best practice guidance.

2.33 *Is there a clear and concise summation of the effects of the proposals?*

The submitted LVIA provides a summary and conclusion in Section 10.

Further Comments

2.34 The submitted LVIA assessment is inadequate and has not been carried out as per guidance in GLVIA3.

2.35 The identification of the landscape and visual baseline is thorough and as per guidance, however, there is a failure to assess adequately the effects on the baseline found.

2.36 The Landscape Assessment of Effects (section 9.1) assesses the magnitude of impact on LCT sub-type 5b as No Change/Negligible. There is also a demonstration of a judgement of magnitude of impact for the construction and operational phases. However, when assessing the Overall Effect during Operation, there appears to be inconsistencies. A 'Medium sensitivity' is combined with a 'Medium magnitude of change', resulting in a 'Low adverse effect'.

2.37 This is inconsistent with 'Table 3: Determination of Overall Effect Matrix' of the submitted LVIA which would follow a Medium sensitivity and Medium Magnitude of Change resulting in a Moderate adverse Effect.

2.38 Similarly, the Residential Properties and Route Receptors, which have been identified for assessment as per guidance (in Table 6 and & 7 respectively), have then not been correctly assessed. There is a simplified 'Overall Effect during construction' assessment which does not seem to correspond to the findings of sensitivity assessed earlier in the report, it generalises them from the earlier findings assuming all to be 'Low' sensitivity. The same judgement of Medium magnitude of change is then applied resulting in 'Low adverse effect'. This is again inconsistent with Table 3 of the submitted LVIA which would combine a Low sensitivity with a Medium magnitude of change to result in a Moderate-Minor adverse Effect.

2.39 The above applies to both the Residential and Route Receptors assessments.

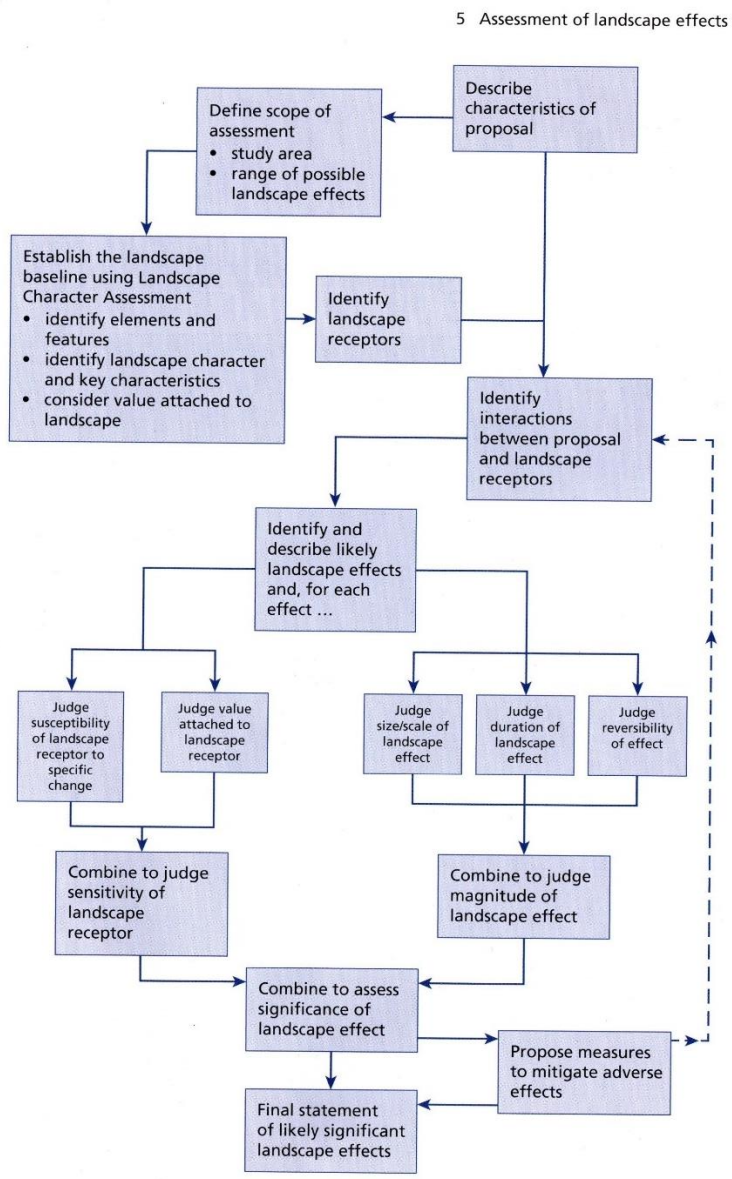

Figure 5.1 Steps in assessing landscape effects

2.40 In 'Figure 5.1' above (taken from GLVIA3), the steps in assessing the landscape effects are demonstrated. The submitted LVIA assessment fails to correctly combine judgements of magnitude of effect and sensitivity to assess the significance of effect. It fails to do this for the landscape receptors and those identified as residential and route receptors which would follow a largely similar methodology.

2.41 Section 7.2 of the submitted LVIA states, 'All properties are assessed as having a High sensitivity to change', however, the sensitivity of the Property Groups is then

assessed in Table 6, with each group assessed a sensitivity depending on the potential views gained.

2.42 The GLVIA3 guidelines suggest that '*visual receptors should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views*.' These are then combined to judge the sensitivity of the receptors. The judgement of magnitude of visual effect is made separately and then combined with the judgement of sensitivity to assess the visual effects.

2.43 In this case, it is not clear that this process has been followed for the Residential or Route receptors assessments.

2.44 The sensitivities assessed appear to be confused with judgements of magnitude of change.

2.45 There is no cumulative assessment in the submitted LVIA. Cumulative wind turbines and other tall infrastructure, such as that at the Sellafield site, have been identified, and there are plans including cumulative elements, however, there is no clear assessment of the cumulative effects as a result of the proposed development.

Overall Conclusion

2.46 A review was undertaken following the current guidance, *Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*, Landscape Institute Technical Guidance Note 1/20 (2020).

2.47 A summary of the findings of the review of the assessment methodology shows that the mostly the correct methodology was used, although not carried out.

2.48 A summary of findings of the review of the scope of the assessment does not contain all the process of an LVIA.

2.49 A summary of findings of the review of the actual assessment of effects shows that judgements of effects have been made with little or no evidence or justification.

2.50 A summary of findings of the presentation of the assessment shows are all the correct presentations included.

2.51 The LVIA was not carried out appropriately, without comprehensiveness, compliance and conformity with relevant guidance and regulations.

2.52 Recommendations for further information include:

- Landscape Architect to carry out process of landscape and visual assessment
- Provide evidence for judgements given
- Show clarity and reasoning for effects
- Refer to GVLIA guidelines

- Include VP from LDNP at Cold Fell and correct viewpoint locations where appropriate.
- Provide a cumulative assessment.

2.53 Overall conclusions on the adequacy of the assessment - in its present state it includes insufficient evidence in making an informed planning decision.

3 INDEPENDENT LANDSCAPE AND VISUAL ASSESSMENT

The Proposal

3.1 The application is for the re-powering of an existing 46.5m high (to blade tip) wind turbine which has been in operation since 2015. This will involve replacing it with a taller 3 blade wind turbine measuring 77m high (to blade tip) along with associated infrastructure for a further period of 30 years.

3.2 The Proposed Development Site is located National Grid Reference (NGR) NY 02329 08344 with the initial expectation being that any new turbine would be located within c.20m from the existing turbine to allow for construction to take place alongside operation of the existing turbine to minimise operational downtime. It is sited adjacent a pre-existing industrial park associated with the West Cumbria Energy Coast.

Independent Landscape Character Assessment

3.3 The following is a summary of the findings of an independent Landscape Assessment for the proposed development.

3.4 Judgements for Landscape Susceptibility and Landscape Sensitivity of LCAs 5b and 11a taken from the Cumulative Impacts of Vertical Infrastructure Study (2014). These are confirmed in the Copeland Wind Energy Technical Document (Feb 2022).

3.5 The Landscape Value, Magnitude of Change and Degree of Significance have been assessed following the GLA methodology (see appendix).

3.6 The assessments of the submitted LVIA have been included alongside the findings of the GLA independent assessment for comparison.

	GLA	**Submitted LVIA**	**GLA**	**Submitted LVIA**	**GLA**	**Submitted LVIA**
	Value		**Susceptibility**		**Sensitivity**	
5b	Medium	-	Medium	-	Medium	Medium – Low
11a	Medium	-	Medium	-	Medium	Medium – Low
Site	Low	-	Medium	-	Medium	-

3.7 There were no judgements of Value or Susceptibility shown in the submitted LVIA.

	GLA	Submitted LVIA	GLA	Submitted LVIA	GLA	Submitted LVIA
	Sensitivity		**Magnitude of Change**		**Degree of Significance**	
5b	Medium	Medium – Low	Low/Medium	No change/ Negligible	Minor/Moderate	Minor – No Change/Negligible
11a	Medium	Medium – Low	Low	-	Minor	-
Site	Medium	Medium	Low	Medium	Minor	Low Adverse ???

3.8 The reasoning behind the judgments for the Magnitudes of Change in the above table are as follows:

3.9 5b – Low/Medium - Although the development would remain a single wind turbine, and so the perception may be of a turbine in the landscape, the change in height of the turbine would be noticeable and would increase the area of the landscape receptor affected. The change in height of turbine would be a noticeable direct change over a localised area.

3.10 11a - Low – The proposed increase in height of the turbine would result in a slightly increased perception of wind development within the neighbouring landscape character area. There would be a perceptible indirect change over a localised area.

3.11 Site - Low – The proposed relocation of the turbine would be noticeable; however, the site would remain a field with a wind turbine present. Its character would be largely unchanged when on site.

Independent Visual Amenity Assessment

3.12 The following is a summary of the findings of an independent Visual Assessment for the proposed development.

3.13 The proposed increase in height would increase the visual presence of the existing turbine in views within the study area. The proposed increase in height is considered in the visual assessment from the 7 existing viewpoint locations.

3.14 An additional viewpoint has been considered along the road at Cold Fell. There is no wirelines or photomontages have been produced from this location, the assessment is indicative only. This has been included in the table below as VP8*.

3.15 The following table provides an outline assessment of the potential visual effects from the identified viewpoints:

VP	***Receptors***	***Value***	***Susceptibility***	***Sensitivity***	***Magnitude of Change***	***Degree of Significance***
1	*Residents*	*Medium*	*High*	*High*	*Medium*	*Moderate or Major*
2	*Road Users*	*Low*	*Low*	*Low*	*Low*	*Negligible or Minor*
3	*Residents*	*Medium*	*High*	*High*	*Low*	*Minor or Moderate*
4	*Road Users / Recreational*	*Low*	*High*	*Medium*	*Medium*	*Moderate*
5	*Road users / Residents*	*Low*	*Low*	*Low*	*Low*	*Negligible or Minor*
6	*Recreational / Road Users*	*Medium*	*Medium*	*Medium*	*Low*	*Minor*
7	*Road Users*	*Medium*	*Low*	*Medium*	*Medium*	*Moderate*
*8**	*Recreational*	*High*	*High*	*High*	*Medium*	*Moderate or Major*

3.16 NB: The Assessments in the above table have been interpreted following a site visit to the originally proposed viewpoint locations. The wirelines and photomontages from the original report were also used to inform the judgements. These judgments are therefore 'unverified'.

Further comments on the Visual Assessment:

3.17 The ZTV shows an increase in potential visibility as a result of the proposed turbine (see 8382-DRW-PLN-0003-Comparative ZTV-v2.0). In the majority of the study

area, this is an incremental increase, except for to the northwest of the proposed development where much of the town of Egremont is within the ZTV.

3.18 No viewpoints have been suggested in this region. Following the site visit, it is considered acceptable that there are no viewpoints in this area, due to the intervening distance, vegetation and other screening effects. Also, it is likely that only the upper portions of the proposed turbine would be theoretically visible from this area of the ZTV.

3.19 Several of the western aspect slopes within the western edge of the Lake District National Park are within the ZTV. The road along Cold Fell is the closest part of the LDNP within the ZTV which would likely have visual receptors with views to the proposal. There are clear views to the existing turbine from lengths of the road, and as such the proposed increase in height would likely increase the visibility of the turbine and potentially its impact on views. It is suggested that there should be a representative viewpoint from this location.

4 SUMMARY AND CONCLUSIONS

The Proposal

4.1 The application is for the re-powering of an existing 46.5m high (to blade tip) wind turbine and replacing it with 3 blade wind turbine measuring 77m high (to blade tip) along with associated infrastructure for a further period of 30 years.

The Review

4.2 This review has been undertaken following the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3rd Edition (2013) and the Landscape Institute in their Technical Guidance Note 1/20 issued in January 2020 - Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs).

Review of Submitted LVIA Summary

4.3 A review was undertaken following the current guidance, Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs), Landscape Institute Technical Guidance Note 1/20 (2020).

4.4 A summary of the findings of the review of the assessment methodology shows that the mostly the correct methodology was used, although not carried out.

4.5 A summary of findings of the review of the scope of the assessment does not contain all the process of an LVIA.

4.6 A summary of findings of the review of the actual assessment of effects shows that judgements of effects have been made with little or no evidence or justification.

4.7 A summary of findings of the presentation of the assessment shows are all the correct presentations included.

4.8 The LVIA was not carried out appropriately, without comprehensiveness, compliance and conformity with relevant guidance and regulations.

4.9 Recommendations for further information include:

- Landscape Architect to carry out process of landscape and visual assessment
- Provide evidence for judgements given
- Show clarity and reasoning for effects
- Refer to GVLIA guidelines
- Include VP from LDNP at Cold Fell and further / correct viewpoint locations
- Provide a cumulative assessment.

4.10 Overall conclusions on the adequacy of the assessment - in its present state it includes insufficient evidence in making an informed planning decision.