



## **Landscape and Visual Assessment - Review**

For

**Highfield Farm Wind Turbine**

Prepared for

**Cumberland Borough Council**

Prepared by

**Galpin Landscape Architecture**

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## 1 INTRODUCTION

### Introduction

- 1.1 This Review considers the submitted *Highfield Farm Wind Turbine Repowering – Landscape and Visual Appraisal* which was prepared by AXIS P.E.D Ltd. in September 2024. Further to this, there is a Landscape and Visual Appraisal chapter within the *Highfield Farm Wind Turbine Repowering Application Reference: 4/24/2334/OF1 – Planning Statement Addendum* which was prepared by AXIS P.E.D Ltd. in February 2025.
- 1.2 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 Landscape and Visual Appraisal (LVA) (September 2024) and Landscape and Visual Appraisal in the Planning Statement Addendum (February 2025).
- 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 wind turbine which was consented in 2013 (application ref: 4/13/2157/OF1).
- 1.5 The OS Grid Reference for the existing wind turbine is NX 98929 12784.
- 1.6 From paragraph 1.2.2 of the original LVA (2024), '*The Proposed Development would comprise the replacement of an existing wind turbine, which has a hub height of 30 metres and a blade tip height of 45.4m, with a new turbine that has a hub height of 50m and a blade tip height of up to 76m, subject to turbine availability.*' This application seeks permission for the above along with associated infrastructure for a further period of 25 years.
- 1.7 The location of the foundation pad for the Proposed Development is shown on Planning Drawing 3369-090-SP-002. This shows that the proposed turbine is within approximately 25m distance from the existing turbine.

### The Review and Methodology

- 1.8 This review has been undertaken following the Guidelines for Landscape and Visual Impact Assessment (GLVIA), 3<sup>rd</sup> 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).

- 1.9 The review report has been completed following a site visit in May 2025. 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

- 1.10 Documents referred to include:

- *Highfield Farm Wind Turbine Repowering – Landscape and Visual Appraisal* (September 2024) (Submitted LVA) and supporting documentation
- *Highfield Farm Wind Turbine Repowering Application Reference: 4/24/2334/0F1 – Planning Statement Addendum* (February 2025)
- *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, 3<sup>rd</sup> 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)
- *Lake District National Park Landscape Character Assessment and Guidelines*, Lake District National Park Authority (2021)

## 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 coloured highlighted italic questions are directly quoted from this 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 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:
- 2.4 *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?*
- There is no scoping opinion for the proposed development. The scope of the submitted LVA is in line with the relevant guidance, in this instance the SNH guidelines were followed.
- 2.5 *What consultations have been carried out and have responses been acted upon?*
- Consultations are not referred to in the submitted LVA. However, a community consultation is mentioned in the Planning Statement (Section 1.4), and para 6.5.2 of the same document highlights that the consultation led to the expansion of the scope of the LVA and increased the number of viewpoints. Further details are not provided.
- 2.6 *Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?*
- There is no evidence of this in the submitted LVA report.

- 2.7 *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. The included methodology appears in line with best practice guidance.

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

Yes – The methodology states that ‘Landscape and visual matters are separate issues, although closely related and interlinked, are dealt with as such throughout the LVA’. This is then demonstrated in the assessment where landscape receptors and visual receptors are assessed separately and according to the relevant methodology.

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

The submitted LVA appears thorough in identifying both landscape and visual receptors. Section 4.0 of the submitted LVA provides a comprehensive list of the landscape and visual receptors identified. The King Charles III England Coast Path National Trail is identified as a receptor in the representative viewpoints chosen but the viewpoint location does not accurately represent views from the route, see para 2.18 of this report.

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

Yes - The assessment is generally descriptive in its judgements, and it is clear how the assessments have been formed.

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

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

- 2.12 *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 LVA 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. The scope of the assessment is proportionate to the scale of the proposed development.

- 2.13 *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 LVA identifies key landscape receptors.

- 2.14 *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. The descriptions of susceptibility and value are clear. How these are combined to form the sensitivity of both landscape and visual receptors is also clearly stated.

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

The submitted LVA considers heritage assets for their contribution to the landscape and visual baseline but does not assess any effect on them as a result of the proposed development. Particularly the heritage coastal path has not been assessed fully.

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

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

- 2.17 *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?*

Yes - The assessments follow closely and clearly to the methodology provided.

- 2.18 *How appropriate are the viewpoints that have been used?*

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

Issues regarding the micro-siting of viewpoint locations are addressed in the following table:

<b>VP</b>	<b>Receptors</b>	<b>Notes</b>
1	Residential receptors	Accurate representation of residential views is confirmed from viewpoint location.  Photographs and Wirelines provided appear to be produced following best practice guidance.

2	Residential receptors	<p>Viewpoint location is approximately 110m to the north of the properties on the northern edge of Ashlea Road housing development on the west side of Egremont.</p> <p>The viewpoint provided more accurately represents recreational users on the public footpath. The views of residential properties to the south of the viewpoint location are likely to experience screening effect of vegetation immediately north of the housing development. There are possible views to the proposed turbine from the upper rooms of properties in the northern part of this housing development.</p> <p>The viewpoint, therefore, represents a worst-case scenario.</p> <p>The grid reference on the viewpoint figure (299800, 510967) is incorrect. Viewpoint appears to be in the vicinity of 299917, 511138.</p>
3	Residential receptors	<p>The viewpoint location is representative of residents on the western edge of Bigrigg. The photographs and wirelines show an accurate representation of the view.</p>
4	Residential receptors	<p>This viewpoint is located on the B5345 at the entrance of the St Bees Priory Church. The proposed turbine is partially screened by trees on the opposite side of the road to the viewpoint location. This filtered screening diminishes the appearance of the turbine in the view and leads to the viewpoint being misleading and not showing a true reflection of the view.</p> <p>Near to this location, there are 'worst-case' views with no tree cover by the gate to the St Bees School fields. Alternatively, approximately 70m along the footpath to the west of the B5345 there are uninterrupted views, over the roadside trees, to the proposed development</p> <p>The viewpoint location is representative of those attending the school, or the St Bees Priory Church. A more accurate representation of residential views from St Bees would be found on the Abbey Vale housing development to the north of the viewpoint.</p>



5	Residential receptors	<p>Accurate representation confirmed.</p> <p>This viewpoint is representative of views along the western edge of the village of Cleator Moor. Further to this, it represents the views of road users travelling along the road into and out of the village.</p>
6	Recreational receptors	<p>This viewpoint is in a poorly chosen and misleading location.</p> <p>The viewpoint provided is in a location which is at a lower elevation than the holiday park to the east, and as such, the holiday park screens views to the proposed site. Only metres west along the coastal footpath there is a full view of the existing turbine and residing hill. Slightly further west, up the hill, there is a view to the existing turbine with the Lake District National Park fells in background.</p> <p>This view, therefore, does not follow guidance as per the GVLIA which encourages 'worst-case scenario' viewpoints.</p> <p>Suggested location for the viewpoint would be: 295890, 511890.</p> <p>Visual receptors using the King Charles III England Coast Path are not adequately represented by this viewpoint. As an important National Trail, it is proposed that a viewpoint at the grid reference suggested above would be required to assess the impact on those receptors. A thorough approach would include a second viewpoint from the route further southeast, near the Seacote caravan park (296346, 511526).</p>

7	Footpath users (Recreational receptors)	<p>This location was not verified on site due to the distance and time required to access it when there are nearer viewing locations within the LDNPA and closer to the site.</p> <p>The viewpoint location is approximately 13.9km northeast of the proposed development. The nearest point of the LDNP is approximately 4.7km from the proposed site.</p> <p>The distance of the viewpoint to the site diminishes the appearance of the proposed turbine, it is therefore suggested that a view from within the national park, but closer to the site, is obtained. For example, a view to the existing turbine was gained from a location along a local road just within the national park, approximately 5.3km northeast of the proposed turbine (304037, 514453). Alternatively, Cold Fell on the western boundary of the national park lies within the ZTV and is approximately 7.6km from the proposed site.</p>
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2.19 *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

2.20 *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.

2.21 *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 LVA provides adequate information on the proposed development at the various development stages.

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



The submitted LVA identifies the potential effects of the proposed turbine.

- 2.23 *Have levels of effect 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?*

n/a - The Proposed Development is not considered an Environmental Impact Assessment (EIA) development.

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

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

- 2.25 *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 LVA clearly presents the baseline landscape and visual conditions along with clear descriptions of the sensitivity of the receptors.

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

Yes – The findings of the assessment are generally clearly stated.

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

Yes - Clearly stated.

- 2.28 *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?*

Not fully sufficient – The Viewpoint location plan, ZTV and viewpoints, wirelines and photomontages are effective. However the quality of the wirelines and photomontages are low quality and are not clear, particularly with distant views. A higher resolution of these would be useful.

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

Not fully sufficient – as per quality issue stated above.

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

Yes - The submitted LVA provides a summary and conclusion.

### Further Comments on the Submitted LVA

- 2.31 In the Planning Statement Addendum, para 5.1.1 states, '*An LVA was submitted as part of the planning submission which assessed the Proposed Development against a baseline of no wind turbine present, which represents the worst-case scenario on the site based on landform alone and without surface screening features (such as trees and vegetation).*' There does not appear to be evidence of this approach within the LVA.
- 2.32 The landscape character assessment states that '*The Site is situated close to the boundary of LCT4: Coastal Sandstone and LCT 5b: Lowland – Low Farmland*'. However, the proposed turbine would only reside in one or another of these defined landscape character types. The large black dot indicating the proposed turbine covers the boundary line.
- 2.33 There is no cumulative assessment in the submitted LVA. There is an explanation in para 3.3.4 although even if there are no new applications, there are still other wind turbines in the vicinity to consider.
- 2.34 Recommendations for further viewpoints:
- LDNPA – a viewpoint from within the National Park closer to the proposed site.
  - Hannah Moor – along Hannahmoor lane there are far-reaching views to the LDNP fells to the east, this viewpoint would be representative of recreational users on the footpath network within the St Bees Heritage Coast.
  - King Charles III England Coast Path:
    - Improved viewpoint 6 location slightly east to improve the view to the site (295890, 511890).
    - Viewpoint from the route just south of Seacote holiday park, northwest of the golf course (296346 511526).
  - B5345 St Bees Road - where there are views across to the site.

- 2.35 Suggested additional viewpoints have been considered and tabled below:

<b>Suggested Additional Viewpoints</b>	
<b>Description</b>	<b>Grid Reference (Approximate)</b>
LDNPA	204296, 514511
Hannah Moor	295496, 514689
King Charles III England Coast Path (1)	295890, 511890
King Charles III England Coast Path (2)	296346, 511526
B5345 St Bees Road (6)	297363, 513130

- 2.36 There is an erratum as turbine height is incorrectly described as 86.5m in paras 5.2.8 & 5.2.18.
- 2.37 There is mention of the Heritage Coast and the LDNP, and these contribute to the baseline. However, these designations have not been assessed specifically. These only seem to be mentioned in viewpoint 7 and summary.

## Overall Conclusion

- 2.38 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).
- 2.39 A summary of the findings of the review of the assessment methodology identified these were carried out according to guidance.
- 2.40 A summary of findings of the review of the actual assessment of effects shows that judgements of effects are correct. However, some chosen viewpoints are located behind trees / buildings and are not a true reflection of the viewpoints.
- 2.41 Additional viewpoints are also suggested where not all of the study area has been considered.
- 2.42 A summary of findings of the presentation of the assessment shows all the correct presentations are included.
- 2.43 Recommendations for further information include:
- Some clarification as stated in 'further comments'
  - Provide additional Viewpoints.
  - Provide a cumulative assessment.
  - Provide assessment details on the Heritage Coast and the LDNP.

### 3 SUMMARY AND CONCLUSIONS

#### The Proposal

- 4.1 This Review considers the submitted *Landscape and Visual Appraisal* for *Highfield Farm Wind Turbine Repowering (4/24/2334/0F1)* is for the re-powering of an existing wind turbine which was consented in 2013 (application ref: 4/13/2157/OF1).

#### Review of Submitted LVIA Summary

- 4.2 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).
- 4.3 A summary of the findings of the review of the assessment methodology identified these were carried out according to guidance.
- 4.4 A summary of findings of the review of the assessment of effects shows that judgements of effects are correct. However, some chosen viewpoints are not a true reflection of the actual viewpoints.
- 4.5 Additional viewpoints are also suggested.
- 4.6 A summary of findings of the presentation of the assessment shows all the correct presentations are included.
- 4.7 Recommendations for further information include:
- Some clarification as stated in 'further comments'
  - Provide additional Viewpoints.
  - Provide a cumulative assessment.
  - Provide assessment details on the Heritage Coast and the LDNP.

#### Conclusions

- 4.8 The submitted LVA was prepared in accordance with guidance and is mostly acceptable.
- 4.9 Some recommendations for further details are suggested.