



DRAFT CUMBRIA WIND ENERGY SUPPLEMENTARY PLANNING DOCUMENT

Statement of Consultation

October 2006

CONTENTS

| | | |
|----------|---|----------|
| 1 | Introduction | 3 |
| 2 | Preliminary consultation | 3 |
| 3 | Response to consultation | 3 |
| | Scope of Wind Energy SPD | 3 |
| | Seascapes and offshore wind schemes | 4 |
| | CO ₂ reduction and energy efficiency | 5 |
| | Common land and land ownership | 5 |
| | Other forms of renewable energy | 5 |
| | Cross boundary issues | 5 |
| | Landscape designation boundary review | 5 |
| | Appendix 1 | 6 |
| | Appendix 2 | 7 |
| | Appendix 3 | 8 |

1 Introduction

1.1 Allerdale Borough Council, Carlisle City Council, Copeland Borough Council, Cumbria County Council, Eden District Council, Lake District National Park Authority, and South Lakeland District Council have jointly prepared a draft Cumbria Wind Energy Supplementary Planning Document (SPD). This will form part of the Local Development Frameworks being developed by each local planning authority.

1.2 This document sets out the methods of consultation that we used during the production of the Cumbria Wind Energy Supplementary Planning Document. It also includes the details of the people we consulted with, the comments we received and the changes we have made as a result of these comments.

2 Preliminary consultation

2.1 As part of the preparation of the Wind Energy SPD¹ 90 organisations and stakeholders were advised about its development. Comments were invited on the scope, content and production of the SPD and its associated Sustainability Appraisal. A copy of the letter we sent can be found in appendix 1. A list of the organisations we consulted with can be found in appendix 2.

2.2 We received responses from 22 organisations. There was good support for the development of the SPD and its focus on landscape and visual impacts. The production of a Sustainability Appraisal was also supported. However, all representations included suggestions on how the scope of the SPD could be broadened. Some representations provided additional information to include in the sustainability appraisal. The main issues raised on the SPD are:

- Broaden the scope of the SPD to include:

| | | |
|------------------------|----------------------|---|
| Cultural heritage | Community benefits | Seascape |
| Biodiversity | Community engagement | Offshore developments |
| Geology/hydrology/soil | Noise | Common land |
| Local economy | Aircraft issues | CO ₂ reduction/energy efficiency |
| Highway issues | Telecommunications | Re-powering existing sites |

- All types of renewable energy sources should be covered, not just wind.
- Ensure that issues crossing local authority boundaries are covered, such as cumulative effects.
- The landscape capacity study should take into account the review of the Yorkshire Dales and Lake District National Park boundaries being carried out by the Countryside Agency.

3 Response to consultation

3.1 Several changes have been made to the draft Cumbria Wind Energy Supplementary Planning Document as a result of this. The sustainability appraisal has incorporated all the issues raised – these are not summarised below, but are included in appendix 3, where the initial responses to each comment are set out. Appendix 3 also includes further details on the comments received on the SPD.

Scope of Wind Energy SPD

3.2 The main focus of the Wind Energy SPD continues to be landscape and visual issues. It also continues to focus only on wind energy and not all renewable energy sources.

¹ In accordance with Regulation 17 of the Town and Country Planning Act 2004

This is largely due to the original impetus behind the production of the SPD.

3.3 At the Examination in Public to the Cumbria and Lake District Joint Structure Plan 2001 – 2016 it was recognised that the original Wind Energy Development for Cumbria Supplementary Planning Guidance (1997) is used by developers and planning authorities alike. The Panel considered that the review of the existing SPG, a tried and tested product, is the best way of providing an appropriate degree of steer to the wind energy development industry. Given the increasing degree of commercial interest in renewable energy, particularly wind development, the Panel strongly encouraged the Joint Authorities to complete the necessary review of supplementary planning guidance in consultation with the industry, district councils, local groups and other interested bodies. The original guidance focussed on issues of landscape and visual impact due to the importance of these aspects and because experience had shown that they were often the most controversial. This is still considered to be the case today.

3.4 However, the consultation on the project brief has identified a number of other relevant and important environmental, social and economic considerations. Many of these are reflected in current criteria contained in Cumbria Joint Structure Plan (2001–2016) Policy R44 - Renewable Energy. We recognise that a range of environmental, social and economic issues also need to be addressed in addition to landscape and visual effects when considering wind energy planning applications. As a result of the comments we received, we have improved the scope of the Wind Energy SPD and added more information on the following issues:

| | | |
|------------------------|----------------------|------------------------------------|
| Cultural heritage | Community benefits | Aircraft issues |
| Biodiversity | Community engagement | Telecommunications |
| Geology/hydrology/soil | Cumulative effects | Ancillary buildings/infrastructure |
| Local economy | Noise | Re-powering existing sites |

3.5 The level of detail that we have included for the above issues is less than that provided for landscape and visual effects. This is largely due to the following:

- The main driver for revising the existing Wind Energy SPG was the recommendation of the Cumbria Joint Structure Plan Examination in Public.
- The original guidance focussed on landscape and visual effects of wind energy developments. This reflects the fact that in Cumbria such effects are the key issue for wind energy developments that need to be addressed by developers and local authorities. Landscape and visual effects continue to be the key area of contention and concern in Cumbria and detailed guidance will be provided on these issues.
- A landscape capacity assessment has been carried out for the landscape types classified for Cumbria outside the Lake District National Park. This forms the basis of the Wind Energy SPD. It provides an objective assessment of the how well a landscape type can accommodate new wind energy developments. Such information was not available when the SPG was carried out and was considered fundamental to the Wind Energy SPD. It removes the subjective views offered in the original SPG. It is not considered feasible to carry out the same level of detailed work for other environmental, social and economic issues in the timeframe that is available. In particular other environmental issues are less subjective to start with, and will always be addressed at the detailed planning application stage.

Seascapes and offshore wind schemes

3.6 We have included information relating to seascapes in part 1 and part 2 of the SPD. Reference is made to offshore wind developments, and the information on seascapes will assist when consultations are made on offshore proposals, but detailed guidance is not provided. As the guidance is linked to the Local Development

Frameworks and the district councils' and Lake District National Park Authority's powers to determine onshore wind applications only, it is not considered appropriate to include guidance specifically for offshore wind development. The Department of Trade and Industry is the decision making body for offshore wind developments, and not the local authorities.

CO₂ reduction and energy efficiency

- 3.7 We have made reference to the need for CO₂ reduction and the role of energy efficiency, renewables etc. as part of the background considerations. We don't consider it appropriate to widen the scope of the SPD to cover energy efficiency in any detail. It is acknowledged that this is the first area that needs to be addressed when seeking to reduce CO₂ emissions nationally. However, the purpose of the guidance is to implement policies seeking to support wind energy development that will contribute to national and regional targets for renewable energy production. The draft North West Sustainable Energy Strategy and Action Plan will provide information on improving energy efficiency, the Local Development Frameworks will provide policies to support greater energy efficiency in buildings, and Part L of Building Regulations will seek to ensure buildings have improved energy efficiency when built or improved.

Common land and land ownership

- 3.8 We have not changed the Wind Energy SPD to deal with landownership issues, including common land. It is acknowledged that landscape elements associated with common land contributes to landscape character. Such elements are already incorporated in the Cumbria Landscape Classification and the Landscape Capacity Assessment that forms part 2 of the SPD.

Other forms of renewable energy

- 3.9 We have not widened the scope of the SPD to cover all renewable technology. The reasons for this are set out below:
- The main driver for developing the SPD was the recommendation of the Cumbria Joint Structure Plan Examination in Public. This recognised that onshore wind energy developments were likely to remain the key way to achieve renewable energy targets in the County and that there was a need for the existing guidance to be updated.
 - The SPD will refer generally to micro-generation/domestic wind turbines. However, any detailed guidance on this would be produced by each local authority, if they deem it appropriate, as part of their Local Development Framework. This also applies to other renewable energy sources. This is largely due to the varied nature of micro-generation and other renewable energy sources, and influences at a local scale.
 - A jointly produced Landscape Character SPD is planned to be developed by all the local authorities. It may be appropriate to address broader renewable energy development impacts as part of this.

Cross boundary issues

- 3.10 Cumulative guidance looks at geographical areas that cut across administrative boundaries and adjacent local authorities are being consulted.

Landscape designation boundary review

- 3.11 We have consulted with Natural England staff to provide an up to date statement on the review of the national landscape designations in the east side of the county. This is included in part 1 of the SPD.
- 3.12 Other issues raised and considered are set out in appendix 3. For copies of the full comments received contact Jenny Wain, County Offices, Kendal, LA9 4RQ.

Appendix 1

Your ref:
Our ref: JLW/P0119

8 February 2006

Environment Unit

County Offices, Kendal
Cumbria, LA9 4RQ
Tel: 01539 773427
Fax: 01539 773439

Dear

Consultation on a Briefing Report and the Draft Scoping Report for the Sustainability Appraisal of the Cumbria Wind Energy Supplementary Planning Document

The Environmental Assessment of Plans Regulations 2004 The Town and Country Planning (Local Development) (England) Regulations 2004

We are currently preparing guidance, in partnership with the Cumbria District Councils and Lake District National Park Authority, for wind energy developments in Cumbria. This will replace 'Wind Energy Development in Cumbria – a statement of supplementary planning guidance, 1997'. It is planned to be adopted by the local authorities as the Cumbria Wind Energy Supplementary Planning Document (WESPD).

It will update the current guidance, accord with the new planning framework and policies, and reflect the changes in the size and scale of wind energy developments across Cumbria. It aims to support wind energy development that does not cause significant harm to the character and quality of our landscapes. It will provide guidance to developers on design, siting, cumulative impact, landscape and visual impact assessments and, importantly, the potential capacity of the County's landscapes to absorb such development.

A short briefing report is attached that sets out the scope of the WESPD and our timetable for delivery. I would be very grateful for any comments you have on this.

When preparing such guidance we are required to prepare a Sustainability Appraisal that assesses the environmental, social and economic impacts of the guidance. Our Sustainability Team has produced a draft Scoping Report for the Sustainability Appraisal which is available on our website www.cumbriacc.gov.uk/planning-environment/planning-policy/planningpolicy.asp. You will be able to view the report on-line, or download a copy. Alternatively, if you would like a paper copy to be posted to you please let me know.

I am consulting you as someone who may be affected by, or have an interest in, the Wind Energy SPD and its Sustainability Appraisal. I shall be grateful if you can let me have any comments on the enclosed Briefing Report and/or Scoping Report by 20 March 2006. This is only the first stage of the consultation process and you will have an opportunity to comment on the full guidance during a formal six-week consultation stage in September/October 2006. However, I would find it very helpful to receive any comments you may have early in the process so that I can feed them into the preparation of the document ahead of formal consultation.

Please contact me if you would like to discuss anything or need further information.

Yours sincerely

Jenny Wain
Landscape and Countryside Officer
jenny.wain@cumbriacc.gov.uk

Appendix 2

Ackroyd & Harrison
Allerdale Borough Council
Arnside and Silverdale AONB
Arnside and Silverdale Landscape Trust
Axis
Barrow Borough Council
Barton Willmore
Baywind Energy Co-operative Ltd
British Wind Energy Association
BTCV
Carlisle City Council
Carlisle Environment Forum
Charlton Landscapes
Churches Together Environment Group
Citadel Chambers
COLT
Copeland Borough Council
CORE (Cumbrians Opposed to a
Radioactive Env)
Country Guardian
Countryside Agency
Cumbria Association for Local Councils
Cumbria Biodiversity Partnership
Cumbria Bird Club
Cumbria County Council
Cumbrian Local Strategic Partnerships
Cumbria RIGS Group
Cumbria Wildlife Trust
Cumbria Windfarms Ltd
Cumbria Woodlands
Department of Policy & Performance
Department of Trade and Industry
DPDS Consulting Group
Duddon Estuary Partnership
Durham County Council
E.on UK plc
E4 Environment
Eden District Council
Eden Rivers Trust
Energy4All Ltd
English Heritage, NW Region
English Nature
Entec UK Ltd
Environment Agency
Enviros Consulting
ERM
FELLS
FORCE
Forestry Commission NW England

Friends of Eden, Lakeland and Lunesdale
Scenery
Friends of Rural Cumbria's Environment
Friends of the Earth
Friends of the Lake District/CPRE
Furness Group, Ramblers Association
Government Office for the North West
Group25
Hayton Parish Council
Hyder Consulting (UK) Ltd
Irthington Parish Council
Jones Day
Kingmoor Parish Council
Lake District National Park Authority
Land Use Consultants
Langdales Society
Lowther Estates
MAIWAG
Morecambe Bay Partnership
NFU (North Cumbria)
No to Whinash Windfarm
North Penines AONB Partnership
North Yorkshire County Council
Npower Renewables Ltd
Open Spaces Society
Ove Arup and Partners Ltd
RSPB
Rural Development Service
SOLAR (Save Our Land and Resources)
Solway Coast AONB Unit
South Lakeland District Council
Stephens Associates
Stephenson Halliday
Sustainability North West
The National Trust
TNEI Services Ltd
Wardell Armstrong
West Coast Energy
West Cumbria Environment Forum
Wind Prospect Ltd
Woodlands Trust
Woolerton Dodwell Associates
Yorkshire Dales National Park Authority

Appendix 3

Cumbria Wind Energy Project Briefing – representations made and resulting changes

| Respondent | Comments | Response |
|---|---|---|
| DTI | Should cover more than landscape and visual impacts – noise and community benefits and community renewables, MOD permission, | A chapter will be included to provide further information on broader environmental and community issues. |
| Countryside Agency | Welcome the preparation and approach of the SPD. Support the continuing focus on landscape and visual issues and the aim to include guidance on landscape and visual impact assessment. Take into account work on the possible extension to the national park boundaries, and the impact of development on land adjacent to landscape designations (or suggested designations). The design element of the guidance could include guidance on scale, configuration, colouring, turbine design and associated structures/infrastructure. Guidance should consider tranquillity, access and recreation and national trails/routes. | The support is noted. Account will be taken of the Countryside Agency's landscape designation review. Guidance will be included on effects to the settings of landscape designations. The design element will include guidance on the issues raised by the Countryside Agency. The landscape capacity assessment will evaluate tranquillity, access and recreation issues. |
| Environment Agency | Need to refer to biodiversity and hydrology, copy of its guidance enclosed | A chapter will be included to provide further information on broader environmental issues. |
| English Heritage | Recent guidance enclosed | A chapter will be included to provide further information on broader environmental issues. |
| North Yorks CC | Should cover all renewables | It is not considered appropriate to extend the scope of the Wind Energy SPD to cover all renewables. The SPD seeks to revise existing guidance on wind energy. Currently the County receives the most pressure from wind energy development, and this is set to continue in the short to medium term. In addition the need for the review of the current Wind Energy guidance arises from the Examination in Public to the Cumbria Joint Structure Plan 2—1-2016. It is acknowledged that guidance to cover all renewable energy types would have value and the local authorities will look to see how this can be achieved in time through their Local Development Frameworks. |
| Durham CC | Support development of supplementary planning document, but need to consider cross boundary issues and cumulative impact. | The Wind Energy SPD will address issues of cumulative effect. Work will need to be carried out to ensure cross boundary issues are addressed satisfactorily. |
| Eden LSP | No comment | |
| Hayton, Kingmoor and Irthington Parish Councils | Turbines are unsightly, unattractive in the landscape, and not cost effective. | The Wind Energy SPD supports Government Guidance (in PPS22) to provide guidance to facilitate wind energy development in the county. The SPD seeks to address issues of landscape and visual |

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| | | amenity in detail to encourage new development that does not create unacceptable harm to landscape character and visual amenity. |
| Npower | Prepare in accordance with PPS22, emerging RSS and consider how the indicative targets will be delivered. | The Wind Energy SPD is being prepared in accordance with PPS22. Work is being carried out to determine the possible effects of the Landscape Capacity Study and suggested targets in Draft RSS. The guidance seeks to facilitate new development and the implementation of Structure Plan policy. |
| National Trust | Welcome review of SPG and cross District approach. Consider all relevant planning issues and all aspect of a wind development, including nature conservation, geology, water quality, soil quality/erosion and tranquillity. Consider seascapes, cumulative impact, offshore developments, cross boundary issues. It is inappropriate to graft on information on the LDNPA capacity study at a later date. | A chapter will be included to provide further information on broader environmental issues. Reference will be made to cumulative impacts, offshore developments and seascape issues. The Wind Energy SPD will not provide direct guidance on offshore developments as the DTI, not the Cumbrian Local Authorities, determine such planning applications. The Lake District National Park is closely involved in the production of the Wind Energy SPD and the emerging work on the landscape classification of the LDNP will be carefully considered and integrated with the SPD when the information is available later this year. |
| RSPB | Should cover biodiversity – data available on birds/species. | A chapter will be included to provide further information on broader environmental issues. |
| Cumbria Wildlife Trust | Needs to cover biodiversity so as not to fail EN1 Sustainability Appraisal Include direct habitat loss, bird strike issues, protected species issues, protected sites (through maps), peatlands, and down stream issues and reflect that CC is partner in BAP. | A chapter will be included to provide further information on broader environmental issues. However, the level of detail requested by Cumbria Wildlife Trust may be beyond the scope of the SPD. Discussions will be held to determine how best to address such issues. |
| Open Spaces Society | Consideration to be given to registered Common Land and commoners rights and its unique character. (Whinash) | It is not intended for the Wind Energy SPD to cover issues of land ownership or commoners' rights in detail. It is accepted that registered Common Land can influence the character of a landscape but it is not felt that this needs to be a separate criteria when judging landscape capacity. |
| Friends of Lake District | Include info on CO ₂ , noise, flicker, economy, highways, aircraft, telecoms, biodiversity, cultural heritage and historic landscapes. Take account of CA designation review, seascapes, offshore schemes, cumulative impact, all aspects of development, and extensions to existing developments. Guide policy ST4, and provide info. on typical conditions/obligations. Liaise with neighbouring authorities. | Information will be included on broader environmental, social and economic issues that reflect the areas raised by Friends of the Lake District. Account will be taken of the Countryside Agency's landscape designation review. Reference will be made to seascapes, offshore schemes, cumulative impact, ancillary aspects of wind energy developments and extensions to existing developments. However, the Wind Energy SPD will not provide direct guidance on offshore developments as the DTI, not the Cumbrian Local Authorities, determine such planning applications. Consideration will be given to providing information on typical |

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| | | conditions/obligations. Consultation will continue to take place with neighbouring authorities |
| FOE South Lakes | Cover more renewables and micro-generation, reflect PPS22, should show presumption in favour of development outside designated areas, should relate to use of energy too, shouldn't make assumptions about technical feasibility – see letter for more details. | It is not considered appropriate to extend the scope of the Wind Energy SPD to cover all renewables. The SPD seeks to revise existing guidance on wind energy. Currently the County receives the most pressure from wind energy development, and this is set to continue in the short to medium term. In addition the need for the review of the current Wind Energy guidance arises from the Examination in Public to the Cumbria Joint Structure Plan 2—1-2016. It is acknowledged that guidance to cover all renewable energy types would have value and the local authorities will look to see how this can be achieved in time through their Local Development Frameworks. Reference is made to local authorities supporting micro/domestic wind schemes, but the Wind Energy SPD does not seek to provide guidance at this level. Again this is an issue that individual local authorities will consider through the preparation of their Local Development Frameworks. |
| FELLS | A diversity of renewable technologies should be considered, along with greater energy efficiency. Should not be finalised nor adopted until the results of CA national park boundary review is complete. | It is not considered appropriate to extend the scope of the Wind Energy SPD to cover all renewables. The SPD seeks to revise existing guidance on wind energy. Currently the County receives the most pressure from wind energy development, and this is set to continue in the short to medium term. In addition the need for the review of the current Wind Energy guidance arises from the Examination in Public to the Cumbria Joint Structure Plan 2—1-2016. It is acknowledged that guidance to cover all renewable energy types would have value and the local authorities will look to see how this can be achieved in time through their Local Development Frameworks. Consideration will be given to the final adoption date and the Countryside Agency's review of the National Park boundary. |
| MAIWAG | Consider adverse effects of noise, shadow flicker, visual dominance and reflected light. Enforce breaches of planning permission and conditions. Consider 'repowering' of existing sites with larger turbines and proliferation (cumulative impact). | Guidance will be provided on the environmental, cumulative, size and visual issues raised by MAIWAG. The SPD does not seek to enforce existing planning permissions; however a copy of the letter will be circulated to the relevant local authorities with the responsibility for such issues. |

Sustainability Appraisal Scoping Report – representations and resulting changes.

| Respondent | Comments | Response - Proposed Changes |
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| North Yorkshire County Council | No comment made on the Scoping Report itself. | No impact on Scoping Report |
| English Nature | <p>English Nature suggest the following additions to the review of relevant policies plans and programmes.</p> <ul style="list-style-type: none"> • European Landscape Convention. • UNESCO World Heritage Convention. • Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention). | <p>Accept comment.</p> <p>Appropriate amendments made to the review of policies, plans and programmes section of the Scoping Report.</p> |
| Environment Agency | <p>The Environment Agency suggest that reference should be made to National Planning Policy Guidance PPG 25, Development and Flood Risk. The WE SPD will need to include guidance to ensure that flood risk is properly taken into account in the planning of windfarm developments.</p> <p>Clearer reference should also be made to the siting of windfarms and the impact on biodiversity (particularly designations such as SAC, SPA, SSSI etc and BAP habitats or species).</p> | <p>Accept comments relating to PPG 25.</p> <p>Appropriate amendments made to the review of policies, plans and programmes section of the Scoping Report.</p> <p>Comments relating to windfarms and potential impacts on biodiversity – minor amendments required in Scoping Report text. Sustainability Framework is felt to be robust and thorough enough to test the SPD for soundness on biodiversity coverage including the impact on specific designation/species/habitats.</p> |
| Friends of the Lake District | <p>Comments relate only to the Project Briefing and the content of the WE SPD itself. It is worth noting that there are comments contained here which have some impact/relevance for the Sustainability Appraisal:</p> <p>FLD would like to see the WE SPD cover the full spectrum of sustainability issues rather than focussing only on landscape and visual impacts.</p> <p>The WE SPD should also include guidance on the windfarm sites themselves such as access roads, sub-stations, lighting and other infrastructure.</p> <p>Cumulative impacts involve more than just a single receptor but also linear routes such as long distance footpaths and road corridors.</p> | <p>No direct impact on Scoping Report. Comments noted.</p> |
| Npower Renewables | <p>Comments relate only to the Project Briefing and the content of the WE SPD itself.</p> | <p>No direct impact on Scoping Report. Comments noted</p> |
| Countryside Agency | <p>The Countryside Agency recommends that the Strategic Objectives set for the WE SPD go beyond guiding developers on the location of windfarms only. This is not strictly an issue for the</p> | <p>Accept comment.</p> <p>Appropriate amendments made to the review of policies, plans and programmes section of the Scoping Report.</p> |

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| | <p>Sustainability Appraisal. Objectives, issues and options will all be subject to change as the Sustainability Appraisal process moves forward.</p> <p>The Countryside Agency suggests the following additions to the review of relevant policies plans and programmes.</p> <ul style="list-style-type: none"> • Countryside Character Volume 2: North West (Countryside Commission) • Landscape Character Assessment – Guidance for England and Scotland (Countryside Agency and Scottish Natural Heritage (2002). <p>Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention).</p> <p>The Countryside Agency raised issues on baseline data.</p> | <p>Comments on baseline data noted.</p> |
| South Lakeland Friends of the Earth | <p>Comments relate only to the Project Briefing and the content of the WE SPD itself.</p> | <p>No direct impact on Scoping Report. Comments noted.</p> |
| Department of Trade and Industry | <p>The DTI would welcome guidance sections to be included in the WE SPD that covered assessment of noise generated from wind turbines, the effect of wind turbines on military radar – particularly the importance of obtaining permission from MoD Defence Estates and the Civil Aviation Authority.</p> <p>The DTI would also like to see the WE SPD include guidance on community benefits.</p> | <p>Whilst there are no direct impacts on the Scoping Report in terms of changes these comments do inform the next stage of the SA process. There are implications for the WE SPD in terms of how broad its guidance scope should be and whether it is appropriate for it to expand beyond landscape and visual amenity.</p> |
| Cumbria Wildlife Trust | <p>CWT would like to see the WE SPD take into account the biodiversity issues raised by wind farm developments, particularly with regards to birds. The Solway Firth and Morecambe Bay are noted as important areas for birds. The north and west of Cumbria is mentioned as having been subject to wind farm developers attention recently. Whilst there is not the same level of designated protection in these areas, much of the improved grassland is singled out as being particularly important for certain grazing wildfowl. Turbine placed along coastal areas are likely to have a high impact on the number of birds killed by strikes as there are many migratory routes through these areas.</p> <p>CWT would therefore like to see bird strike mapping carried out as part of the SPD process.</p> <p>CWT would also like to ensure that maps for protected sites, including all internationally, nationally and locally protected sites,</p> | <p>No direct impact on Scoping Report, the SA will address biodiversity issues through EN1. Comments noted.</p> <p>Biodiversity is addressed through the sustainability framework for Cumbria.</p> |

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| | are included in the SPD to inform developers and planners of where wind farms would be inappropriately sited and would be likely to cause harm to the biodiversity interests. | |
| Open Spaces Society | The Open Spaces Society wish to see registered common land being recognised for its unique character as part of the guidance | No direct impact on Scoping Report. Comments noted. |
| Friends of Eden, Lakeland and Lunesdale Scenery (FELLS) | <p>1. Comments relating to Table 2, Compatibility Matrix:</p> <p>FELLS note that there are only 3 ‘ticks’ out of a possible 80 illustrating the difficulty in trying to reconcile the irreconcilable. FELLS state that windfarms are incompatible with enhancing and preserving and make specific reference to tranquillity and impacts on the landscape.</p> <p>2. FELLS believe that NW Regional Authorities have not given sufficient weight to the value of Cumbria’s landscape.</p> <p>3. FELLS believe that the undue concentration on wind power is seriously detracting from the deployment of other technologies and therefore the ability to reduce greenhouse gases and improve local air quality.</p> <p>4. FELLS would like to see the adoption of the WE SDP postponed until the Countryside Agency has made a decision about the redrawing of the National Park Boundaries in Cumbria.</p> <p>5. Para 5.1 of the Scoping Report – FELLS question the use of the term ‘global’ in describing sustainable development and question the impact local Cumbrian actions can have on global sustainability impacts.</p> <p>6. Para 11.1 of the Scoping Report – FELLS question the use of the term ‘appropriate locations’ and state that there are no appropriate locations for windfarm development.</p> <p>7. FELLS question the way in which the public are involved in the planning of windfarms and the planning process in general. FELLS also wish to see schools being able to access both sides of the wind energy debate.</p> | <p>2. Response to comments relating to the Compatibility Matrix:</p> <p>Carrying out a compatibility test of plan objectives is a required part of the Sustainability Appraisal process. The aim of this test is to find out whether the plan objectives are broadly in line with the Sustainability Framework. In this case many of the ‘scores’ given were ‘no effect’. The reason for there being so few compatibility ticks is that there is so much uncertainty this early in the plan making/appraisal process. The WE SPD also covers visual and landscape issues at this time meaning the relationship with other sustainability issues in the framework is inherently limited. A more in depth appraisal of the sustainability impacts and benefits of the WE SPD will be carried out in subsequent stages of the Sustainability Appraisal.</p> <p>2. Whilst not directly an issue for the Scoping Report testing the impact on landscape is built into the Sustainability Framework and will be tested as part of the full appraisal of the WE SPD.</p> <p>3. NR1 is one element of the Sustainability Framework which has been agreed by a wide range of stakeholders across Cumbria as a robust test of sustainability. NR1 will test whether a plan contains adequate scope/policies to improve air quality and reduce greenhouse gas emission. Comment will be added to the scoring here to clarify the position with regards this objective. There may be scope for the WE SPD to address a wider range of renewable technologies in its guidance but this will be something that is explored in subsequent stages of the appraisal process.</p> <p>4. Comments noted – the work of the Countryside Agency is being taken into account.</p> <p>5. Comment noted – the term ‘global’ is used here to reinforce the fact the sustainable development has a global dimension. Any action we take in our locality contributes to the overall effects to our planet. Local changes combined and multiplied up can have</p> |

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| | | <p>national, international and global effects and reflects out collective responsibility which is, in part tested by sustainability appraisal.</p> <p>6. Comments noted – this comment related to the broad objectives set out in the WE SPD – they will be rigorously tested by the sustainability appraisal. As the strategic planning authority in Cumbria, CCC must accept that wind power applications will be made and judgements will have to be taken as to their suitability. The most appropriate locations are those which will have the least impact on the environment, people and the landscape. The sustainability appraisal will test this approach.</p> <p>7. Comments noted – When developing the WE SPD the public are consulted in accordance with Regulation 16 of the Town and Country (Local Development) (England) Regulations 2004. There are also a number of opportunities to comment of the Sustainability Appraisal process. Each local authority will process planning applications in accordance with Government guidance and their Statement of Community Involvement, which sets out the ways in which the public will be involved in the planning process in Cumbria. Schools are able to access information like any other organisation and the Cumbria Grid for Learning provides a website where teachers can access a great variety of unbiased information on the subject.</p> |
| Hayton, Kingmoor and Irthington Parish Councils | <p>Hayton, Kingmoor and Irthington Parish Councils collectively had the following comments: Wind turbines are unsightly, not attractive on the landscape, especially in certain designation like AONBs and believe they are not cost effective.</p> | No direct impact on Scoping Report. Comments noted. |
| Eden Local Strategic Partnership (LSP) | No Comments | |
| RSPB | The RSPB would like to see the WE SPD cover a broader range of sustainability issues. There also point out that a great many sensitive species can be found outside of protected areas and therefore recommend that map based should be used to inform developers of restricted areas. | No direct impact on Scoping Report. Comments noted. |
| National Trust | <p>The National Trust draw attention to the UK Sustainable Development Strategy and the need to recognise environmental limits.</p> <p>They question what is meant by ‘material assets’ in paragraph</p> | <p>Environmental limits will be addressed through the full SA. Material assets is one of the topic areas defined by the Strategic Environmental Assessment Directive when prescribing what an assessment should cover. Whilst it is open to interpretation, for the purposes of this assessment it is taken as meaning economic</p> |

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| | <p>8.7 and 8.10 and more specifically whether this includes the impacts on heritage.</p> <p>The National Trust question why heritage issues are not addressed through EN1 and EN3 of the Sustainability Framework.</p> <p>The National trust feels it is wrong to focus on 'key characteristics' of the landscape as sets out in para 11.1 of the Scoping Report.</p> <p>The National trust would like to see the scope of the WE SDP broadened out beyond landscape and visual impacts.</p> <p>Various comments relating to indicators.</p> | <p>capital such as infrastructure, roads, housing and the built assets of society.</p> <p>The potential impacts of the WE SPD on heritage assets will be tested by the Sustainability Framework through EN2.</p> <p>EN2 will adequately test all aspects of the WE SPDs potential impacts on all heritage assets. Heritage is not included as part of EN1 or EN3 as this would simply duplicate the objective testing part of the appraisal process.</p> <p>The key characteristics mentioned in para 11.1 is one aspect of one objective of the plan. Whilst this is not an issue related to the Scoping Report directly the WE SPD provides guidance to developers on carrying out landscape assessments which should include other elements that contribute to the landscape's character, including cultural, archaeological and ecological elements.</p> <p>There may be scope for the WE SDP to address a wider range of renewable technologies in its guidance but this will be something that is explored in subsequent stages of the appraisal process.</p> <p>Comments noted - Indicators are being developed as part of the appraisal process which requires the monitoring of the plans progress against a set of indicators developed from the plan objectives and evidence base.</p> |
| Durham County Council | Durham County Council wish to see both the cumulative and cross boundary issues that windfarm development raise addressed through the SPD. | This will be address through the appraisal process. |
| Mr David Brierley | Mr David Brierley has reservations about windfarms and their proximity to residential property. The impacts from noise and shadow flicker should be taken into account. He knows of houses located within 400m of a wind farm in Cumbria and has noted the effects. | No direct impact on Scoping Report. Comments noted. |