

Cumbria Wind Energy Supplementary Planning Document

Statement of Consultation Responses and Adoption Changes July 2007

ID	Consultee ID	Comments	Response	Action
1	116	Include a summary of provisions and reproduce the JSP policies in full.	The eight steps to wind energy development seeks to provide a summary of the SPD's provisions, along with key guidance highlighted in bold throughout. It is considered that this is sufficient summary guidance. The JSP policies will be included in an appendix to Part 1 along with a reference to the saved policies which the SPD is adopted against.	Add a new appendix to Part 1 setting out the relevant saved policies in full.
2	116, 74	A Habitats Regulation appropriate assessment needs to be carried out.	This is accepted and has been carried out in consultation with Natural England. Text has been amended and inserted in the biodiversity section in Part 1.	Revise text in new section 2, Part 1 in accordance the Habitats Regulations appropriate assessment to ensure that the SPD does not cause likely significant effect.
3	1, 6, 11, 23, 27, 30, 31, 32, 39, 41, 42, 44, 46, 48, 49, 54, 55, 58, 66, 67, 70, 72, 74, 83, 84, 88, 89, 98, 99, 103, 104, 105, 128, 133, 137, 150, 153	Support principle of SPD	Comments noted	No action required
4	11, 23, 39, 42, 46, 72, 73 80, 84, 98, 104, 105, 137	Support scope of SPD	Comments noted	No action required
5	16	The SPD should assist in preparing Environmental Assessments.	Comment noted. It is the intention that the SPD will assist with the design and siting of schemes and the preparation of Environmental Impact Assessments.	No action required
6	11, 88, 123, 131, 134, 135, 150, 153	Support principle of renewable energy	Comments noted	No action required

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7	9, 16, 45, 84, 88,106	Scope of SPD should be widened.	<p>This has been considered in detail both at the pre- consultation stage and post consultation stage. It is not considered appropriate to widen the scope of the guidance to include all renewable energy sources for several reasons. The recommendation of the Examination in Public to the Joint Structure Plan sought for existing guidance on wind energy to be updated. In addition to this the targets in the Draft Regional Spatial Strategy focus on wind energy as having the greatest potential to deliver renewable energy targets in the region, and in particular for Cumbria. In practice the greatest interest from renewable energy developers is for wind energy development. It is also considered that the other likely renewable development would either be offshore (wave or tidal) which would not be determined by the local planning authorities, or be of such a small scale (e.g. micro generation, biomass and hydroelectric) that it would not warrant strategic guidance, or such a large scale (e.g. a one off scheme such as large scale hydro) that it would not be determined by the local planning authorities.</p> <p>Therefore it is considered important to progress the SPD retaining its scope on wind energy to provide guidance for this type of development.</p>	Add new text to the introduction of Part 1 "The spatial planning system can help minimise the demand for energy and increase energy efficiency through planning new homes, jobs and infrastructure. It also has a role to play in supporting new renewable energy production. This could be wind, biomass, photovoltaic, geothermal and hydroelectric, both at a commercial and micro scale." "Renewable energy has an important role to play as an alternative to the increased use of fossil fuels and nuclear energy generation. There are a range of renewable energy technologies that are being exploited and developed to help deliver more renewable energy supplies. The UK is the windiest place in Europe and the Government see wind energy as playing a major role in delivering renewable energy over the next decade and beyond." Under the new structure these become paragraphs 1.3 and 1.4 respectively.
8	16, 53, 77, 78	SPD inappropriate and damaging – information unsubstantiated, negative and restrictive.	<p>This is not accepted. The Government Office for the North West did not raise an objection to the SPD. A full review of the text has also been carried out to ensure it accords with national and regional policy guidance and other good practice advice. It is acknowledged that there is an emphasis on landscape and visual effects that could be perceived to present a biased approach. The guidance will be restructured and revised to distinguish between the broad range of issues that need to be considered when developing a wind proposal and more detailed information relating to landscape and visual effects. It is not accepted that the guidance will restrict development. It seeks to provide general guidance on wind energy development and to set out a strategic baseline for judging proposals against landscape character. It clearly sets out that there is capacity for further wind energy development across the county. It is not accepted that the text is unsubstantiated, however a review of the text will remove negative associations and allow for references to be checked.</p>	<p>Revise text to ensure it accords with national and regional policy and good practice advice. Restructure the SPD into 2 parts. Part 1 will provide general advice on all planning issues related to wind energy development and Part 2 will provide detailed advice on landscape and visual effects, assessing these, and include a landscape capacity assessment.</p>
9	77	The SPD is overly prescriptive and sets unrealistic and onerous requirements.	This is not accepted. The SPD provides guidance to support the local policy frameworks, it does not set further policy.	No action required
10	130	Guidance predisposes areas to accepting wind farms	<p>This is not accepted. The SPD provides broad guidance on the issues that need to be addressed when considering a wind energy development. It includes a landscape capacity assessment that sets out the indicative potential to accommodate wind energy development in landscape and visual terms only. It does not identify sites for development, but seeks to encourage further development in accordance with national, regional and local policy that seeks to avoid significant harm to a range of social, economic and environmental issues and encourage renewable energy development in appropriate locations. Such locations will be tested on a case by case basis as proposals come forward.</p>	<p>Revise the structure of Part 1 to bring the current section 6 to the fore. Add further guidance on general siting and design and cumulative effects issues to cover all planning issues. Move detailed information specific to landscape and visual issues from sections 3, 4 and 5 to Part 2. Incorporate Part 3 into Part 2. Part 2 will become a more technical part of the SPD providing objective assessment and detailed guidance on landscape and visual issues.</p>

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11	139	SPD supports developers and not local communities.	The SPD has been written to provide strategic, objective advice on developing wind farms. It is aimed at both wind energy developers, professional, local planning authorities, organisations and the local community. It seeks to interpret national, regional and local policy that supports the need for renewable energy. It includes a section on community engagement and community benefits and highlights the full range of planning considerations that need to be taken into account when developing a scheme, and for local authorities when judging a scheme. It is not accepted that the SPD should be weighted in favour of either developers or local communities. It needs to reflect relevant planning considerations and to highlight the types of issues that will need to be addressed.	No action required
12	31, 104, 149	Wind turbines need to be built now to combat climate change. and the planning process should be speeded up.	These comments are acknowledged. The SPD seeks to guide future development as schemes come forward from developers. Providing a baseline of information and taking a strategic approach should help ensure a consistent approach is taken on wind energy schemes in a timely fashion.	No action required
13	1, 45, 53, 74, 77, 83, 96, 110, 106	Focus biased to landscape and visual issues. This could restrict development and cause harm to other issues.	<p>It is accepted that the SPD provides more detailed information on landscape and visual effects. There are several reasons for this. PPS22 recognises that of all renewable technologies wind turbines are likely to have the greatest visual and landscape effects. It also highlights the need for these to be assessed using objective descriptive material and analysis wherever possible, and for policies to address the minimisation of visual effects, such as siting, layout, design and colour etc. The SPD seeks to provide objective material and analysis of the landscape and visual effects through the landscape capacity assessment in Part 2 and guidance on siting and design and cumulative effects to ensure a consistent approach is taken on each wind proposal across the county. It does not seek to protect the landscape character at the expense of other interests. The SPD highlights the range of other issues that need to be taken into account when dealing with wind proposals in section 6. It is accepted that by putting these issues after detailed sections focusing only on landscape and visual effects could provide a bias and users of the guide could focus on the landscape issues without giving a balanced consideration of other issues. The structure of the SPD will be revised to bring reduce any bias. Part 1 will provide guidance on the full range of issues that need to be addressed first, including general advice on siting and design, and more detailed information on landscape and visual effects, their assessment and the Landscape Capacity Assessment will be moved to Part 2.</p>	<p>Revise the structure of Part 1 to bring the current section 6 to the fore. add the following text to the scope of guidance in section 1 "This Guidance replaces previous supplementary planning guidance for wind energy development issued in 1997. It applies to schemes of less than 50MW which are normally determined by local planning authorities where one or more turbines provide energy either directly to an individual or a group of buildings or for the sole purpose of producing electricity to support the national energy network. It applies to new schemes and extensions to, and re-powering of, existing schemes Schemes above 50MW are determined by the DTI. The guidance is divided into two parts.</p> <p>Part 1 : guidance on addressing environmental, social and economic effects when preparing wind energy proposals.</p> <p>Part 2 : technical guidance on landscape capacity, landscape and visual effects and carrying out landscape and visual impact assessments."</p> <p>Add further guidance on general siting and design and cumulative effects issues to cover all planning issues. Move detailed information specific to landscape and visual issues from sections 3, 4 and 5 to Part 2. Incorporate Part 3 into Part 2. Part 2 will become a more technical part of the SPD providing objective assessment and detailed guidance on landscape and visual issues. Amend Step 7 in the summary and move to Step 3.</p>

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14	22	The SPD appears based on the preconception that change in the landscape is always detrimental.	It is not accepted that the SPD is based on this. Instead it seeks to provide guidance to help ensure wind energy development takes place in the most appropriate locations taking into account the full range of planning issues. Detailed guidance on landscape and visual effects and a landscape capacity assessment is included in the SPD to provide a strategic baseline for future decisions on a type of development that has the characteristics to potentially effect a large area. The landscape capacity assessment identifies that there is scope to accommodate more wind energy development in the future and guidance on siting and design seeks to encourage schemes that are compatible with landscape character and visual amenity.	No action required
15	45, 109	The SPD fails to take a holistic approach.	The SPD provides general guidance on all the planning related issues set out in current county planning policy and is holistic in this respect. With regard to landscape issues, the SPD and associated landscape capacity assessment takes a strategic view of landscape character across the county. It does not seek to demonstrate that each of the 37 landscape character sub types could accommodate a wind energy scheme, but that 11 out of the 14 main landscape types have some capacity to accommodate wind energy schemes. It also contains guidance on siting, design and cumulative effects.	No action required
16	10, 22, 45, 53, 60, 66, 71, 77, 78	The SPD is contrary to PPS22 - tone too negative and subjective.	It is accepted that in some cases the language could be perceived as negative and subjective. This will be amended in the review of the document.	Revise guidance to remove negative and subjective language.
17	82	The production of Supplementary Planning Guidance is contrary to PPS12. This refers to the production of Supplementary Planning Documents.	The guidance being produced fully accords with PPS12 and will be adopted as a Supplementary Planning Document. It will replace the existing Supplementary Planning Guidance that dates from 1997.	No action required
18	82	No mention of current review of PPS22	There is no review of PPS22 planned. PPS1 has been reviewed and a consultation carried out on PPS1 Climate Change in December 2006 following the close of the consultation period on the SPD. As part of the consultation review of the SPD, the opportunity has been taken to consider the implications of PPS1 Climate Change draft guidance.	No action required
19	71	Will the SPD accord with emerging government guidance on Climate Change.	Draft PPS1 Climate Change was issued for public consultation following the SPD's consultation period. Due consideration has been given to this draft PPS. The Government Office for the North West does not consider the SPD to be overly restrictive in its approach. The first chapter of Part 1 of the SPD has been revised to strengthen the role of the SPD in helping to tackle climate change and draft PPS1 has been referred to in doing this.	Add to paragraph on national planning guidance "Planning Policy Statement 1 and its emerging guidance on climate change will also apply and supersede or strengthen some guidance contained in PPS22. This seeks to encourage development that supports Government policy on climate change and sets out further guidance on the role of renewable energy. It is considered that the landscape capacity approach set out in this guidance is compatible with this emerging guidance."

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20	23, 41, 44, 60, 77, 82, 116, 131, 133	Simplify presentation/format to be more user friendly. Is overly complex and doesn't make concise conclusions.	It is accepted that the structure and presentation of the guidance should be improved to assist with its interpretation and understanding. Part 1 of the guidance will be restructured and expanded to cover the full range of planning related issues. Part 2 will be restructured to provide specific guidance on landscape and visual issues and contain existing section 3 from Part 1, relevant information from section 4 and 5, Part 1, Part 2 and Part 3. The document provides key guidance to assist with understanding the key issues.	Revise the structure of Part 1 to bring the current section 6 to the fore. Add further guidance on general siting and design and cumulative effects issues to cover all planning issues. Move detailed information specific to landscape and visual issues from sections 3, 4 and 5 to Part 2. Incorporate Part 3 into Part 2. Part 2 will become a more technical part of the SPD providing objective assessment and detailed guidance on landscape and visual issues. Add key guidance to each section to highlight key actions.
21	19	Challenge the "mass of irrelevant information" filling up the report and implying that every conceivable opinion will be taken into account to provide maximum support to objectors	It is not accepted that the SPD contains irrelevant information. It provides a broad perspective that reflects the full range of issues that need to be addressed when determining the acceptability of a scheme. The SPD refers to planning related issues. However, it is accepted that in some cases it highlights some wider concerns that the local community might have without making a clear distinction that these are not planning related issues. The text will be revised to clarify such points.	Amend text to make a clear distinction throughout between relevant planning issues and issues that will not be dealt with but may be of concern to local communities.
22	45	Indicate the priorities that LPAs will give to the differing considerations required by the SPD	LPAs will consider each of the issues set out in the SPD equally. The characteristics of the site and scheme will dictate which issues might have greatest significance, but all need to be assessed equally. It is not accepted that the SPD should be amended to set out any priorities.	No action required
23	23, 44, 66, 74, 77, 78	Clarify role and consistent use of G points	It is accepted that the guidance should be revised to clarify the role of the G points and that they should be applied consistently throughout the document. The G points highlight key guidance set out in the SPD. They do not provide policy. SPDs do not provide policy, but additional guidance on local development plan policy. G points will be applied consistently to Part 1 and LG points will be introduced in Part 2 to reflect key landscape related guidance.	Add text to paragraph 1.5 "Key guidance on a range of issues is highlighted in bold to summarise steps that should be taken when developing a wind energy scheme. It should be noted that they do not constitute policy. They are referenced as G in Part 1 to refer to guidance and LG in Part 2 to refer to landscape guidance". Under the new structure this becomes paragraph 1.21 Part 1. Highlight key guidance in Part 1 and Part 2.
24	66	LPAs should organise a programme of awareness raising on climate change and the SPD once adopted.	It is accepted that an awareness raising programme will help officers, developers and councillors understand the SPD and the role wind energy has to play in combating climate change. The principle of funding for a Climate Change Officer for Cumbria has been agreed by the North West Development Agency in support of the sub regional partnerships implementing the Regional Climate Change Strategy and Action Plan. It is anticipated that a Climate Change Officer will be appointed in Autumn 2007 to support the implementation of the Cumbria Climate Change Strategy and Action Plan. An awareness raising programme is also being developed to support the adoption of the SPD.	No action required
25	101	Applications should be used to evaluate the performance of the SPD.	As part of the annual monitoring required by local planning authorities the SPD will be monitored. It is not considered appropriate to identify applications that it will be monitored against at this stage.	No action required

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26	105	Challenge the consultation deadline extension for the Parish of Shap.	Following a meeting of the Shap and Eden Fells Neighbourhood Forum it was agreed to extend the consultation deadline to enable people to form a response to the consultation. Despite the council's best efforts to publicise the consultation in local papers, its website, the neighbourhood forum meeting and by providing a copy of the document in the local library, many people had not been aware of this. It is accepted that this was an anomaly, however due to the strength of feeling at the meeting and the closing date being 4 days away it was agreed to provide an extension. The principle of extending the deadline had already been established with Parish Councils. Some Parish Councils requested an extension to support their committee timetables and these had been agreed by the local planning authorities.	No action required
27	131	Consultation would be more meaningful if parish councils were directed to the sections relevant to them.	Comment noted. The consultation process accorded with national planning regulations and the details of each local planning authority's Statement of Community Involvement, which involved public consultation as part of their development. When carrying out a county wide consultation contact needs to be made with each of the 283 Parish Councils across the county. The logistics involved in identifying the specific areas of the plan that relate to each parish would be large and time consuming and could add delays to the process of producing the guidance. In addition to parish councils local councillors and a range of professional and community organisations also needed to be informed of the consultation process. It is for this reason that a standardised approach has to be taken when informing people of the consultation process. A contact name and details were provided to enable people to seek advice or help in interpreting the documentation during the consultation period. Some Parish Councils requested an extension to support their committee timetables and these were agreed by the local planning authorities.	No action required
28	136	Consultation process a sham as not enough time provided for responses.	This comment is noted, but not accepted. The consultation period followed national regulations requiring comments to be sought during a 6 week period. This ran from 30 October until 8 December. It also reflected the details of each local planning authority's Statement of Community Involvement, which involved public consultation as part of their development. Letters were sent to a range of organisations informing them of the consultation and providing information on how they could obtain a copy of the document. Copies of the SPD were also made available in council offices and all the libraries in Cumbria. The SPD was also available on each of the partnering local planning authorities' websites. Unfortunately it is often likely that several consultation periods for a range of planning related issues may run in parallel for reasons beyond the control of a local planning authority. Some Parish Councils requested an extension to enable them to support their committee timetables and these were agreed by the local planning authorities.	No action required
29	84	Require developers to provide adequate maintenance provision throughout the life of the development	It is not accepted that it is the role of the guidance to do this. Planning consent is usually granted for a temporary period, ie 20years. Conditions will be attached to the consent to ensure the site is maintained during its lifetime and to ensure that it is decommissioned if electricity generation ceases before the period of the temporary consent. For example a standard condition might seek for decommissioning following a 6 month period where no electricity is generated. .	No action required

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30	84	Establish legal responsibility for decommissioning in the event of bankruptcy	<p>It is not accepted that it is the role of the guidance to do this. Planning consent is usually granted for a temporary period, ie 20years. Conditions will be attached to the consent to ensure the site is decommissioned upon the termination of the temporary time period, or if electricity generation ceases, whichever happens first. For example a standard condition might seek for decommissioning following a 6 month period where no electricity is generated. The liability for decommissioning would lie with the developer, or in the event of bankruptcy with the landowner. The landowner is likely to take steps to ensure that provisions are in place to enable them to act if bankruptcy occurs.</p>	No action required
31	129	Wind is a passing phase and no one is likely to want to spend money decommissioning them.	All planning permissions for wind energy development in Cumbria are temporary. Conditions will be attached to the consent to ensure the site is maintained during its lifetime and to ensure that it is decommissioned if electricity generation ceases before the period of the temporary consent. For example a standard condition might seek for decommissioning following a 6 month period where no electricity is generated.	No action required
32	143	Consultation is useless without the details of where wind farms will be erected.	The role of the SPD is to provide strategic guidance to help guide future wind energy development as it comes forward on a site by site basis. It supports the local planning policy framework and shouldn't identify sites. To do so would be contrary to national planning guidance in PPS22.	No action required
33	103, 133	Add Executive summary	The 'Eight Steps to Developing a Wind Energy Proposal' acts as the current executive summary. It is accepted that text can be added to this section to clarify its role as a summary of the SPD.	Add the following text to the end of the first sentence of the 'Eight Steps to Developing a Wind Energy Proposal'. "this section summarises the main issues addressed by the SPD and acts as the Executive Summary."
34	83	Add step on climate change and understanding the renewable energy contribution in the Eight Steps to Developing a Wind Energy Proposal section.	The 'Eight Steps to Developing a Wind Energy Proposal' acts as the current executive summary. It is accepted that this section should be revised to include reference on climate change and the need for renewable energy in the north west and nationally. Additional text will also be added to the body of the guide reflect this issue.	Revise the 'Eight Steps to Developing a Wind Energy Proposal "Understanding Climate Change - The need to tackle climate change is firmly on the UK's agenda. The Government's energy strategy is seeking an energy mix in the future that will reduce harmful CO2 emissions. This includes the need for 20% of our energy to come from renewable sources by 2020. Wind energy, is a proven technology, and a key renewable source and important to the future UK energy mix. This guidance helps to facilitate new wind energy development in Cumbria to meet climate change objectives." This becomes Step 1 under the new structure.

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35	70, 83	Add step on understanding the renewable energy contribution and regional policy context in the Eight Steps to Developing a Wind Energy Proposal section.	The 'Eight Steps to Developing a Wind Energy Proposal' acts as the current executive summary. It is accepted that this section should be revised to include reference to the energy framework in the north west and nationally. Additional text will also be added to the body of the guide reflect this issue.	Revise the 'Eight Steps to Developing a Wind Energy Proposal "Understanding the Policy Framework - The full range of national, regional and local policies and strategies need to be understood when dealing with renewable energy schemes. Targets have been set at national and regional levels for renewable energy production and wind is set to play a big part in achieving these. Schemes that do not cause significant harm to a range of environmental, economic and social issues should be favourably considered through the planning system." This will become Step 2 under the new structure.
36	103	Step 3 should clarify which local officers it refers to.	This is accepted in part. As the document is being produced jointly by the county council, Lake District National Park Authority and District and Borough councils the first sentence will be amended to clarify it is referring to the relevant local planning authority.	Amend 1st sentence of Step 3 "It is important to engage with planning officers from the relevant local planning authority at an early stage." Under the new structure this becomes Step 6.
37	23	Step 8 should highlight the need to integrate design and planning of a wind development with the statutorily required EIA process – reference in Step 6 will be deleted. the EIA should not be carried out at the end of the process when all the important commitments on design have already been	It is accepted that further reference could be added to the executive summary, via the Steps to section to identify the role of the EIA for those schemes that will require one. This could be added to the existing step on Siting and Good Design. The current	Add to the Step on Understanding Site Characteristics and Good Design "This process should be integrated with the Environmental Impact Assessment if one is required." This becomes step 9. Delete "by the EIA" in Step 6, Understanding the Local Planning Authority.

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38	1, 44, 77, 78, 81, 103	Amend references to Environmental Impact Assessments (EIA) to reflect regulations (paragraph 3.3, 6.3, 6.17)	<p>It is accepted that the existing text does fully reflect regulations and the fact that there is a threshold to scheme size where EIAs are required. However, the Companion Guide to PPS22, paragraph 5.16, suggests it is appropriate for issues, such as the landscape and visual effects, to be considered by smaller applications that do not trigger a full EIA. The regulations identify that an EIA is required where the development involves the installation of more than 2 turbines; or where the hub height of any turbine or height of any other structure exceeds 15 metres. A new paragraph will be included at the start of section 2 to establish this. The replaces paragraph 6.3. Paragraph 3.3 should be amended accordingly. Paragraph 6.17 is deleted due to more general text being introduced on design and mitigation in Part 1.</p>	<p>Add new text on EIA at start of section 2. This replaces paragraph 6.3. "For schemes of two turbines or more, and those with a hub height that exceeds 15m, a full Environmental Impact Assessment is required in accordance with the Environmental Assessment Regulations. This should be integrated into the design process and a range of specialist advisors may be needed at the start of this process to ensure the issues set out below are properly considered. For schemes below the EIA threshold information should be provided on such issues through a planning statement to support an application.." Under the new structure this becomes paragraph 2.2, Part 1. Move paragraph 3.3 to Part 2 and amend "Every site is unique, and any proposal involving 2 or more wind turbines or those with a hub height exceeding 15m must be accompanied by an Environmental Impact Assessment that includes a detailed landscape and visual impact assessment following to the guidance set out in section 3, Part 2. For other schemes below this threshold the effects of the proposal should be included in a planning statement." Under the new structure this becomes paragraph 1.7, Part 2. Delete paragraph 6.17.</p>
39	77	The SPD pre-empts the EIA process as there is little reference to site specifics.	<p>This is not accepted. The SPD provides guidance when developing a scheme. It clearly states that an EIA will be expected for those proposals that meet the EIA requirements. It does not seek to make a judgment on acceptability of wind energy schemes, but highlight the full range of issues that need to be addressed when developing a scheme.</p>	No action required
40	1	Clarify position of Map 4 and need to map other issues as well as landscape	<p>Map 4 sets out the landscape capacity of Cumbria to accommodate wind energy schemes. It does not map other issues that also need to be considered. It is accepted that clear labelling of Map 4 will assist with its interpretation and the need for it to be read in conjunction with Part 2 of the SPD. Additional maps identifying the international nature conservation sites will be added to the guide. This will ensure it accords with the Habitats Regulations and identify internationally protected areas that need to be considered by any wind energy development.</p>	<p>Revise the labelling of Map 4 and move to Part 2 of the SPD. Move Map 3 on landscape character to Part 2 also. Add Maps on international wildlife designations to Part 1.</p>
41	59, 80	Support maps	Comment noted	No action required

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42	32, 73, 82, 133, 137, 139	Improve legibility/detail of maps	It is accepted that the maps are difficult to interpret at present and will be improved. To support the current A4 format of the document the maps will be enlarged to fit more fully on an A3 pullout and be based on a simplified base map. The maps will be indicative only. It is not considered possible to produce maps in the document that would be clear enough for people to identify detailed locations. However, steps will be taken to develop an electronic map that would enable developers, professionals and the community to identify detailed locations to support the SPD in the medium term.	Produce maps at a full A3 format.
43	73	Add a map merging map 1 and map 4.	A map showing wind speed above 6.5m/s and landscape capacity could be produced. However, this would be difficult to make legible and could be seen to be demonstrating a crude sieving process that could be contrary to PPS22. This states that technical considerations shouldn't be taken into account when considering renewable energy applications. In merging these maps landscape capacity would be seen against wind speed which is only one technical consideration that developers take into account when selecting a site. It is considered acceptable to continue to include Map 1 as this highlights the high wind speeds that are experienced in Cumbria.	No action required
44	60	Add a figure showing the study area of the SPD.	This is not accepted. The maps already found in the SPD clearly show the area that the SPD applies to is the whole of the county of Cumbria.	No action required
45	60	References to the current situation in Cumbria should only appear once in the document.	References to Cumbria's context and the nature of scheme are set out following each other in section 1 of Part 1. The only other reference to recent experience refers specifically to cumulative issues. This was set out in section 4 of Part 1. It will be moved as part of the restructuring to section 3 of Part 1. It is accepted that the text provides a baseline of information for 2007, but this is considered useful information and context setting. It is not accepted that it will be less easy to update.	No action required
46	60	Footnotes or endnotes should be used consistently. Part 1 refers to footnotes and Part 2 and 3 refer to endnotes.	This is acknowledged and one set of notes will be applied for consistency sake.	Amend end notes to become footnotes in revised Part 2.
47	13, 14, 17, 28, 32, 49, 57, 111, 141, 149	Turbines should be developed in urban/industrial areas not countryside	It is not accepted that the SPD should guide development to urban/industrial areas. This would be contrary to PPS22 which states that a sequential approach should not be made when dealing with renewable energy schemes (for example, by giving priority to the re-use of previously developed land) and that many types of renewable energy development are capable of being accommodated in urban as well as rural areas. PPS7 also states that local planning authorities should provide for the sensitive exploitation of renewable energy sources in the countryside. The SPD seeks to provide general guidance on siting and design and highlights the need to be aware of the relationship with manmade structures and the scale of buildings and landscape characteristics. It also includes a landscape capacity assessment of urban and urban fringe areas as well as rural areas.	No action required

ID	Consultee ID	Comments	Response	Action
48	130	A section on 'why wind farms are needed' should highlight why they are needed in the countryside more than in cities	It is accepted that text should be added setting out why wind energy development is needed. However it is not accepted that this section should include a debate on why development is needed in the countryside more than cities. The SPD recognises guidance in PPS22 that states many types of renewable energy development are capable of being accommodated in urban as well as rural areas, and guidance in PPS7 that states that local planning authorities should provide for the sensitive exploitation of renewable energy sources in the countryside. The SPD provides guidance on the general principles of good design, siting and cumulative effects for the full range of planning issues identified in current structure plan policy. It highlights the need to be aware of the relationship with manmade structures and the scale of buildings and landscape characteristics. It includes a landscape capacity assessment of urban and urban fringe areas as well as rural areas.	Introduce new paragraphs to Section 1 "The environmental benefits of wind energy are mainly linked to the contribution it has towards reducing the harmful impacts of climate change, without action climate change will jeopardise the landscape, biodiversity and human activities across Cumbria. Wind energy can also bring about social and economic benefits through job creation in the manufacturing, construction and maintenance industry. The off shore wind schemes around the coast of Cumbria have already contributed to new work for Cumbrian companies. It can also support rural diversification providing an opportunity for farmers to sell or rent land to commercial wind energy companies or support community owned projects. It can also provide opportunities to power homes, buildings and businesses off the grid and provide educational opportunities. The environmental, economic and social benefits of renewable energy schemes are material considerations when dealing with planning applications. However, careful consideration also needs to be given to any effects that may arise from renewable energy schemes. Wind energy schemes are no exception to this. Schemes need to be well designed, reflect local circumstances and demonstrate how any environmental, social and economic impacts have been minimised through careful site selection, design and other measures. These are also material planning considerations and as such, these issues will need to be addressed on a site by site basis to determine the most acceptable scheme for a site." Under the new structure these become paragraphs 1.7 and 1.8 Part 1.
49	14, 52, 84	Consider small groups of turbines on brownfield industrial, commercial and residential estates to supply them directly.	The SPD applies to schemes such as this and the full range of planning issues would be considered against proposals for such schemes. However, it is not accepted that a preference should be made to such schemes. This would be contrary to PPS22 which states that a sequential approach should not be made when dealing with renewable energy schemes (for example, by giving priority to the re-use of previously developed land) and that many types of renewable energy development are capable of being accommodated in urban as well as rural areas. PPS7 also states that local planning authorities should provide for the sensitive exploitation of renewable energy sources in the countryside. The SPD seeks to provide general guidance on siting and design and highlights the need to be aware of the relationship with manmade structures and the scale of buildings and landscape characteristics. It also includes a landscape capacity assessment of urban and urban fringe areas as well as rural areas.	No action required

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ID	Consultee ID	Comments	Response	Action
50	84	Consider turbines along transport corridors to minimise extra infrastructure required	The SPD applies equally to locations such as this as any other schemes. The characteristics of transport corridors are taken into account through the landscape capacity assessment. It is not accepted that a preference should be made to such locations. The SPD seeks to provide general guidance on siting and design and highlights the need to be aware of the relationship with manmade structures and the scale of buildings and landscape characteristics.	No action required
51	10, 28, 92, 118, 124, 131, 132, 134, 138, 143, 154	Opposed to large scale wind development, particularly in the countryside.	It is not accepted that it is the role of the SPD to determine whether or not wind energy development should be built in Cumbria. The SPD provides advice to help implement local planning policies on wind energy development. National and regional targets have been set to encourage renewable energy development in support of national policy to mitigate climate change.	No action required
52	124, 31, 149	A referendum is needed to establish community views on whether or not wind energy development should happen in Cumbria.	These comment are noted. However, it is not accepted that it is the role of the SPD to determine whether or not wind energy development should be built in Cumbria. The SPD provides advice to help implement local planning policies on wind energy development. National and regional targets have been set to encourage renewable energy development in support of national policy to mitigate climate change. When an application is submitted for a wind energy scheme the views of the local community are sought by the local planning authority and taken into account along with the effects of a scheme on local amenity and other planning issues, when making a decision .	No action required
53	8, 14, 17, 32, 34, 51, 88, 92, 100, 107, 109, 121, 122, 126, 132, 134, 145, 147, 151	Wind development causes unacceptable visual intrusion.	Visual effects will vary with the size and number of turbines and the landscape characteristics of an area. The SPD acknowledges that visual effects can sometimes be great, and in accordance with PPS22, provides guidance on the design and siting of wind energy development to ensure developers consider the visual effects at the planning stage.	No action required
54	4, 8, 10, 29, 34, 37, 49, 55, 62, 101, 107, 121, 123, 126, 132, 134, 141, 146	Turbines are inefficient, intermittent and unreliable energy source. Consideration should be given to storage of power.	It is not accepted that the SPD is inappropriate on the grounds that turbines are inefficient, intermittent and unreliable, or that it should consider the storage implications of renewable power. In accordance with PPS22 the SPD does not seek to make assumptions about the technical or commercial feasibility of renewable energy development. This is not a relevant planning issue and should not be considered by the SPD.	No action required
55	123	Concerns that power is lost in transmission and that attention is given to only harvesting one form of renewables per site.	It is not accepted that the SPD should address issues of power lost in transmission. This is something that applies to any energy production and is linked to the national distribution network/grid. The SPD does not preclude development that includes renewable energy from a variety of sources. Planning policies exists and are being developed through the Local Development Frameworks to encourage a range of renewable energy sources to be exploited in Cumbria.	No action required
56	33, 84, 111	Detailed analysis of the output and performance of existing turbines essential in order to understand reasons for inefficiency	It is not accepted that the SPD should provide guidance on these issues. In accordance with PPS22 the SPD does not seek to make assumptions about the technical or commercial feasibility of renewable energy development. This is not a relevant planning issue and should not be considered by the SPD. However for the purpose of clarity text on this point will be added to the general section on site selection and design in Part 1.	Add to new paragraph in section 4, Part 1 "However, economic and technical issues associated with wind energy development, such as the wind resource in the area and the cost of developing a project, are not material planning considerations and would not be taken into account when making a decision." Under the new structure this becomes paragraph 4.2 Part 1.

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ID	Consultee ID	Comments	Response	Action
57	4, 10, 29, 49, 89, 97, 107, 124, 132	Nuclear energy could be a better solution,	<p>It is not accepted that the SPD is inappropriate on the grounds of nuclear energy being a better solution. The Government is committed to taking action to mitigate against climate change. It acknowledges that the continuing production of carbon dioxide is contributing to the increasing rate of climate change and its approach includes a combination of strategies including reducing the need to use energy, using it more efficiently, increasing the proportion of energy from renewable sources and supporting energy production with low/no carbon emissions. Wind energy development in Cumbria does and will contribute towards the proportion of energy produced by renewable energy technology in the UK and will form part of a package of solutions to reducing carbon emissions and securing secure energy supplies.</p>	No action required
58	8, 17, 28, 32, 34, 101, 107, 109, 141	Challenge role of government subsidies for wind/economic case and need for elected member to consider the economic case for wind in Cumbria.	<p>It is not accepted that the SPD is inappropriate on the grounds of government subsidies. In accordance with PPS22 the SPD does not seek to make assumptions about the technical or commercial feasibility of renewable energy development. The funding of wind energy development is not a relevant planning issue and should not be considered by the SPD.</p>	No action required
59	43, 60, 93, 97, 101, 107, 124, 146	Challenge government policy on wind energy.	<p>It is not accepted that the SPD is inappropriate on the grounds of challenging government policy. The SPD accords with PPS 22 which seeks to provide government guidance on planning for renewable energy and help implement the Government's Energy Policy stance.</p>	No action required
60	86	Planning applications that may affect neighbouring authorities should be forwarded to them for consultation.	This is standard development control practice and does not need to be reflected in the SPD.	No action required
61	8, 99	Consider introducing a presumption against development in areas recognised as sensitive but not designated.	This is not accepted and would be contrary to PPS22. Development needs to be considered favourably unless significant harm to certain issues is demonstrated.	No action required
62	23, 103, 130	Disappointing that Barrow BC is not part of consultation and need for clear statement on status of document in Barrow area.	Barrow Borough Council supports the production of the SPD and it remains included in its Local Development Scheme. It is accepted that a note on the status of the SPD in relation to BBC should be added.	Add to the existing sentence on the status regarding BBC on inside front cover. "Until then this document will be a material planning document as it provides guidance to strategic renewable energy policy in the Joint Structure Plan."
63	7, 12, 36, 86, 89, 125, 117, 140, 152	No comments on SPD	Comments noted	No action required

ID	Consultee ID	Comments	Response	Action
64	74	Integrate information on nature conservation, technical issues and historic environment better	<p>It is accepted that the guidance could be strengthened by dealing with such issues in a more balanced way. However, the guidance will not be reviewed to contain an equal amount of information and capacity type assessments on these issues. It is considered that such an approach would result in a very cumbersome document and that more detailed information is already available from other sources. This information is either objective in nature, technically based and difficult to dispute or statutorily required. However, an objective study on landscape capacity is not available for Cumbria outside of this guidance. It continues to be considered appropriate to provide this formally as part of the guidance. PPS22 recognises that of all renewable technologies wind turbines are likely to have the greatest visual and landscape effects. It also highlights the need for these to be assessed using objective descriptive material and analysis wherever possible, and for policies to address the minimisation of visual effects, such as siting, layout, design and colour etc. The SPD seeks to provide objective material and analysis of the landscape and visual effects through the landscape capacity assessment in Part 2 and guidance on siting and design to ensure a consistent approach is taken on each wind proposal across the county. It does not seek to support development at the expense of other interests.</p>	<p>Revise text and presentation of information to ensure all issues affected by wind energy development are stated at the outset of the guidance.</p>
65	22, 45, 81, 83	Add more on technical issues and market conditions	<p>It is not accepted that the guidance should include details on the technical issues and market conditions relating to developing a wind energy scheme. It would be contrary to PPS22 for the guidance to make assumptions about the technical and commercial feasibility of wind proposals. As a result of PPS22 the Axis technical study was only used to inform the development of policy, and was not adopted as part of the Joint Structure Plan. The SPD will take precedence over this study as it accords with guidance set out in PPS22. Although it is recognised that technical issues, such as maximising production potential, are key drivers for wind developers when selecting a site, the full range of issues identified in the SPD must be taken into account when determining the design and layout and acceptability of a proposal. It is accepted that references should be added on maximising energy production potential and the importance of ensuring that the site also fits well with other planning issues at the same time. The guidance already reflects the fact that turbine sizes change as technology improves and reference is made to the need for site characteristics to determine the size of machinery used.</p>	<p>Add the following to new paragraph 4.4 Part 1 Site Selection and Initial Sizing When appraising a potential site's suitability and to help determine the most appropriate size and number of turbines it could accommodate the following issues will be considered by a developer at the outset:</p> <ul style="list-style-type: none"> Can the site fit sufficient wind turbines to optimise energy production? Is the site windy enough? Is there grid infrastructure near the site? Will large delivery vehicles be able to gain access to the site? Is there enough distance between a site and dwellings, rights of way, roads? Are aircraft, radar and telecommunications issues likely? Are there archaeological designations/sensitivities associated with the site? Are there ecological designations/sensitivities associated with the site? Are there landscape designations/sensitivities associated with the site and what is the landscape capacity? <p>The first three issues listed above are important technical issues that the developer will need to consider when determining the viability of a site. However, they are not relevant planning issues and will not be considered by the planning authority when it assesses an application. The effect of the development on the other issues will be considered fully by the planning authority.</p>

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ID	Consultee ID	Comments	Response	Action
66	1	Add a definition of the term landscape	The Guidelines for Landscape and Visual Impact Assessment (The Landscape Institute and Institute for Environmental Management & Assessment define landscape as "Human perception of the land conditioned by knowledge and identity with a place." It is accepted that this definition could be added to the Glossary of Part 1 for the purpose of clarity.	Add "Landscape - Human perception of the land conditioned by knowledge and identity with a place." to the Glossary in Part 1
67	60	Challenge the use of LCA as an abbreviation for landscape capacity assessment. It is usually used as an abbreviation of landscape character assessment.	It is not accepted that the abbreviation should be changed. It is only used in the SPD when referring to the landscape capacity assessment and this is clearly stated.	No action required
68	60	Add fact sheet on what a wind development includes.	It is accepted that information setting out the characteristics of a 'typical' wind energy development could be introduced as part of an annex to Part One.	Add text and a diagram setting out the general characteristics of a wind proposal as an appendix to Part One.

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ID	Consultee ID	Comments	Response	Action
69	53, 60, 66, 78, 77, 83, 87, 103, 104	Add more on climate change, acknowledge it as a reality and highlight the benefits of renewable energy.	It is accepted that text should be amended to ensure the guidance clearly sets out the role wind energy has to play with regard to climate change and the UK Energy Policy and energy mix. It is important for the guidance to demonstrate how it is supporting such objectives.	Amend the beginning of section 1 "Climate Change The need to tackle climate change is firmly on the UK's agenda. There is a body of scientific evidence that demonstrates that human activities are contributing towards global warming and climate change through rising carbon dioxide (CO2) and other green house gas emissions. The consequences of climate change will be profound with rising costs for global and national prosperity, people's health and the natural environment. Action is needed now to reduce CO2 and other harmful emissions and mitigate against the effects of climate change. The Government has developed a strategy for tackling climate change that takes a comprehensive approach to a. minimising the demand for energy b. increasing energy efficiency c. developing renewable energy sources d. developing cleaner energy sources Renewable energy is an integral part of the Government's Energy Strategy. It is committed to produce 10% of the UK's electricity from renewable sources by 2010, and is aiming to produce 20% by 2020. In 2004 3.6% of our electricity was from a renewable source. In order to achieve this regional and local Government need to take action to support renewable energy schemes. This guide is one approach that Cumbria is taking on this. As wind energy development will continue to have such a major role in delivering national and regional renewable energy targets this guidance will focus exclusively on this type of renewable technology.

ID	Consultee ID	Comments	Response	Action
70	28, 67	Paragraph 1.1 should be revised as it over states changes to the climate and fails to recognise that CO2 is not the root cause of climate change but exacerbates it.	This is accepted in part. Climate change is an accepted phenomenon and it is accepted that there are complexities associated with it. It is accepted that human activity and CO2 production contribute to climate change and the text will be revised to acknowledge this. The UK government is committed to tackling this through a range of ways. One way is through the production of clean and renewable energy. It would be inappropriate for guidance seeking to help meet government targets on renewable energy to underplay the policy stance behind this. Due to other comments received on the need for the SPD to set the context on the need for renewable energy this paragraph will be revised.	Amend the beginning of section 1 "Climate Change" The need to tackle climate change is firmly on the UK's agenda. There is a body of scientific evidence that demonstrates that human activities are contributing towards global warming and climate change through rising carbon dioxide (CO2) and other greenhouse gas emissions. The consequences of climate change will be profound with rising costs for global and national prosperity, people's health and the natural environment. Action is needed now to reduce CO2 and other harmful emissions and mitigate against the effects of climate change. The Government has developed a strategy for tackling climate change that takes a comprehensive approach to a. minimising the demand for energy b. increasing energy efficiency c. developing renewable energy sources d. developing cleaner energy sources Renewable energy is an integral part of the Government's Energy Strategy. It is committed to produce 10% of the UK's electricity from renewable sources by 2010, and is aiming to produce 20% by 2020. In 2004 3.6% of our electricity was from a renewable source. In order to achieve this regional and local Government need to take action to support renewable energy schemes. This guide is one approach that Cumbria is taking on this. As wind energy development will continue to have such a major role in delivering national and regional renewable energy targets this guidance will focus exclusively on this type of renewable technology.
71	4, 8, 10, 17, 43, 49, 62, 92, 97, 101	Turbines won't prevent climate change.	It is not accepted that the SPD is inappropriate on the grounds that wind turbines won't prevent climate change. The Government is committed to take action to mitigate against climate change. It is widely accepted that carbon dioxide is the main gas contributing towards global warming and subsequent climate change. The Government acknowledges that the continuing production of carbon dioxide is contributing to the increasing rate of climate change. Its approach to tackling this includes a combination of action including reducing the need to use energy, using it more efficiently and increasing the proportion of energy from renewable sources. Wind energy development in Cumbria does and will contribute towards renewable energy production in the UK and the Government's aim to reduce carbon dioxide emissions and mitigate climate change.	No action required

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ID	Consultee ID	Comments	Response	Action
72	28, 83, 84	Paragraphs 1.1 and 1.2 should reflect Government energy hierarchy and regional strategies and seek to reduce energy consumption and increase energy efficiency.	It is accepted that the text could better reflect the Government's energy hierarchy with the additional reference to renewable energy. However the reference to cleaner energy sources will remain as this is clearly part of the Government's energy strategy.	Amend paragraph 1.2 "The Government has developed a strategy for tackling climate change that takes a comprehensive approach to a) minimising the demand for energy b) increasing energy efficiency c) developing renewable energy sources d) developing cleaner energy sources."
73	77	Paragraph 1.2 should refer to sub regional targets as well as national.	It is accepted that a reference to regional and local action could be added to the section that aims to set out the global and national drivers behind the need for more renewable energy. Further reference to the importance of meeting sub regional targets is addressed later in this section also.	Add to paragraph 1.2 "...Renewable energy is an integral part of the Government's Energy Strategy. It is committed to produce 10% of the UK's electricity from renewable sources by 2010, and is aiming to produce 20% by 2020. In 2004 3.6% of our electricity was from a renewable source. In order to achieve this target regional and local Government are taking action to support renewable energy schemes. This guide is one approach that Cumbria is taking on this. As wind energy development will continue to have a major role in delivering national and regional renewable energy targets this guidance will focus exclusively on this type of renewable technology." Under the new structure this becomes paragraph 1.4 Part 1.
74	77, 83	Paragraph 1.2 should set out why wind energy is the preferred renewable option.	It is accepted that the text could more positively explain the role of wind energy in delivering national and regional targets.	Add new text to paragraph 1.4 an 1.5 "Renewable energy has an important role to play as an alternative to the increased use of fossil fuels and nuclear energy generation. There are a range of renewable energy technologies that are being exploited and developed to help deliver more renewable energy supplies. The UK is the windiest place in Europe and the Government see wind energy as playing a major role in delivering renewable energy over the next decade and beyond. Wind energy development is a proven, viable and rapidly developing renewable energy technology. It continues to offer significant potential in the region and across Cumbria, particularly in meeting targets set for 2010 (10% of energy from renewable sources). In 2004 it provided 4.4% of the national renewable energy production, with large scale hydroelectric contributing 10.5% and bio fuels contributing 83.8%. Through the development of up to date policies and advice we can help facilitate more wind energy development and assist in tackling climate change."

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ID	Consultee ID	Comments	Response	Action
75	54	In paragraph 1.3 should the third bullet refer to land use?	No, Part 3 of the guidance provides detailed guidance on preparing a landscape and visual impact assessment for wind energy development.	No action required
76	44, 83	Delete/change reference to noise and damage to wildlife as they are negative in tone.	It is accepted that this paragraph was unduly negative and should be amended. In line with other comments received it has been deleted and replaced with new text to present a more balanced approach to the benefits of wind energy and the issues that need to be carefully addressed so no harm is caused.	Introduce new paragraphs "The environmental benefits of wind energy are mainly linked to the contribution it has towards reducing the harmful impacts of climate change, without action climate change will jeopardise the landscape, biodiversity and human activities across Cumbria. Wind energy can also bring about social and economic benefits through job creation in the manufacturing, construction and maintenance industry. The off shore wind schemes around the coast of Cumbria have already contributed to new work for Cumbrian companies. It can also support rural diversification providing an opportunity for farmers to sell or rent land to commercial wind energy companies or support community owned projects. It can also provide opportunities to power homes, buildings and businesses off the grid and provide educational opportunities. The environmental, economic and social benefits of renewable energy schemes are material considerations when dealing with planning applications and significant weight will be attached to them. However, careful consideration also needs to be given to any effects that may arise from renewable energy schemes. Wind energy schemes are no exception to this. Schemes need to be well designed, reflect local circumstances and demonstrate how any environmental, social and economic impacts have been minimised through careful site selection, design and other measures. These are also material planning considerations and as such, these issues will need to be addressed on a site by site basis to determine the most acceptable scheme for a site." Under the new structure these become paragraphs 1.7 and 1.8 Part 1.

ID	Consultee ID	Comments	Response	Action
77	60, 78	Amend paragraph 1.6 to refer to effects on wildlife and remove spurious reference to noise.	it is accepted that this paragraph could be revised to be more balanced in its approach and to reflect issues that are dealt with through the planning system.	Replace paragraph 1.6 with "It is important that we look favourably on wind energy development that does not cause unacceptable harm to our built and natural environment. When preparing wind energy proposals a range of environmental, social and economic effects need to be considered. The guidance provides general advice on range of issues that must be dealt with for planning reasons. This includes aircraft and radar, biodiversity, cultural heritage, landscape and visual, local amenity, local economy, soils and hydrology and telecommunications." Under the new structure this becomes paragraph 1.22, Part 1.
78	49, 60, 70, 71, 77	Add references to the social, environmental and economic benefits of wind schemes to paragraph 1.6 and in the community section and the consequences of doing nothing.	It is accepted that the SPD could be strengthened to include more information on the need for developers to set out the social, economic and environmental benefits arising from any specific development and some of the consequences if no action is taken. This will be provided in Part One of the guidance and reiterated in the section on Community Benefits and Local Economy.	Add "The environmental benefits of wind energy are mainly linked to the contribution it has towards reducing the harmful impacts of climate change, without action climate change will jeopardise the landscape, biodiversity and human activities across Cumbria. Wind energy can also bring about social and economic benefits through job creation in the manufacturing, construction and maintenance industry. The off shore wind schemes around the coast of Cumbria have already contributed to new work for Cumbrian companies. It can also support rural diversification providing an opportunity for farmers to sell or rent land to commercial wind energy companies or support community owned projects. It can also provide opportunities to power homes, buildings and businesses off the grid and provide educational opportunities. The environmental, economic and social benefits of renewable energy schemes are material considerations when dealing with planning applications." Under the new structure this becomes paragraph 1.7 Part 1.
80	67	Support paragraph 1.7.	Comment noted	No action required

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ID	Consultee ID	Comments	Response	Action
81	70, 83, 87	Add more on national and regional context/plans/strategies	It is accepted that text should be amended to ensure the guidance clearly sets out the role wind energy has to play with regard to climate change and the UK Energy Policy and energy mix and the regional context. It is important for the guidance to demonstrate how it is supporting such objectives.	Add text to paragraph 1.1 "Regional Guidance The North West Sustainable Energy Strategy, July 2006, sets out the action needed to tackle climate change for the North West. This suggests that the greatest cross cutting impact in our region is likely to be increased risks of flooding. Other issues will include sea level rise and an increase in annual temperatures. This could lead to heat waves, moorland fires and a change in biodiversity as some species fail to evolve to the new climate conditions and habitats. It sets out a hierarchy for action that reflects the Government's approach above. Under the new structure this becomes paragraph 1.11 Part 1.

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ID	Consultee ID	Comments	Response	Action
82	45, 66, 71, 83, 84, 87	Add more on role of wind in meeting government targets/UK energy mix	<p>It is accepted that text should be amended to ensure the guidance clearly sets out the role wind energy has to play with regard to climate change and the UK Energy Policy and energy mix and the regional context. It is important for the guidance to demonstrate how it is supporting such objectives.</p>	<p>Add to the start of section 1, Part 1 "Renewable energy is an integral part of the Government's Energy Strategy. It is committed to produce 10% of the UK's electricity from renewable sources by 2010, and is aiming to produce 20% by 2020. In 2004 3.6% of our electricity was from a renewable source. In order to achieve this target regional and local Government are taking action to support renewable energy schemes. This guide is one approach that Cumbria is taking on this. As wind energy development will continue to have a major role in delivering national and regional renewable energy targets this guidance will focus exclusively on this type of renewable technology. The role of wind energy developments Renewable energy has an important role to play as an alternative to the increased use of fossil fuels and nuclear energy generation. There are a range of renewable energy technologies that are being exploited and developed to help deliver more renewable energy supplies. The UK is the windiest place in Europe and the Government see wind energy as playing a major role in delivering renewable energy over the next decade and beyond. Wind energy development is a proven, viable and rapidly developing renewable energy technology. It continues to offer significant potential in the region and across Cumbria, particularly in meeting targets set for 2010 (10% of energy from renewable sources). In 2004 it provided 4.4% of the national renewable energy production, with large scale hydroelectric contributing 10.5% and bio fuels contributing 83.8%. Through the development of up to date policies and advice we can help facilitate more wind energy development and assist in tackling climate change." Under the new structure this becomes paragraph 1.6 Part 1.</p>
83	16	The consultation should have considered issues of energy supply infrastructure and different energy sources.	<p>The consultation was carried out as part of the statutory process for developing a Supplementary Planning Document. As the SPD focuses solely on wind energy it would not have been appropriate to specifically obtain views on a wider energy debate. The Government is currently carrying out further consultation on its energy policy providing an opportunity for such issues to be raised by individuals at a national level.</p>	No action required

ID	Consultee ID	Comments	Response	Action	
84		9, 13, 16, 31, 34, 42, 47, 52, 55, 84, 88, 89, 90, 93, 96, 97, 100, 101, 107, 123, 126, 124, 132, 141, 146, 147, 151	Add more on other energy sources - both renewable and non renewable.	It is accepted that text should be amended to ensure the guidance clearly sets out the role wind energy has to play with regard to the UK Energy Policy and energy mix. However it is not considered appropriate to add detailed guidance on other energy sources for several reasons. The recommendation of the Examination in Public to the Joint Structure Plan sought for existing guidance on wind energy to be updated. The targets in the Draft Regional Spatial Strategy focus on wind energy as having the greatest potential to deliver renewable energy targets in the region, and in particular for Cumbria. The greatest interest from developers is for wind energy development and it is considered important to progress the SPD with the current scope to provide guidance for future development. It is likely that other renewable development would either be offshore (wave or tidal) and would not be determined by the local planning authorities, be of a small scale (micro generation, biomass and hydroelectric) or be of such a large scale that it would be a one off scheme (large scale hydro) and would not be determined by the local planning authorities. Allerdale Borough Council will be producing a SPD on micro renewable generation as part of its Local Development Framework.	
85	103		Onshore infrastructure of offshore wind schemes should be considered here.	This is not accepted. The SPD provides guidance for onshore wind schemes only. It takes a holistic approach to all the elements associated with the construction and operation of a scheme. As a result it includes advice on the infrastructure associated with the turbines. However, if the case arises for ancillary infrastructure associated with offshore or other renewable energy development to be built within Cumbria any proposal would be considered under the relevant policies of the local development framework. Text will be added to clarify this position.	Add new text to the start of the SPD "The spatial planning system can help minimise the demand for energy and increase energy efficiency through planning new homes, jobs and infrastructure. It also has a role to play in supporting new renewable energy production. This could be wind, biomass, photovoltaics, geothermal and hydroelectric, both at a commercial and micro scale." "There are a range of renewable energy technologies that are being exploited and developed to help deliver more renewable energy supplies. The UK is the windiest place in Europe and the Government see wind energy as playing a major role in delivering renewable energy over the next decade and beyond. Wind energy development is a proven, viable and rapidly developing renewable energy technology. It continues to offer significant potential in the region and across Cumbria, particularly in meeting targets set for 2010 (10% of energy from renewable sources). In 2004 it provided 4.4% of the national renewable energy production, with large scale hydroelectric contributing 10.5% and bio fuels contributing 83.8%. Through the development of up to date policies and advice we can help facilitate more wind energy development and assist in tackling climate change." Under the new structure these become paragraphs 1.3 and 1.6 Part 1 respectively.

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ID	Consultee ID	Comments	Response	Action
86	71, 144	Paragraph 1.9 should clarify whether the height is to hub or tip height and should be raised to 25m to hub height in line with policy in the Joint Structure Plan.	The guidance currently refers to turbines with hub heights of 15m and 25m. The reference to 25m is linked to the Joint Structure Plan policy R45 that seeks to support turbines with a hub height of less than 25m. The reference to 15m relates to requirements of the Environmental Impact Assessment Regulations. An EIA is required for one or more turbines above 15m. It is accepted that such references should clearly state what they apply to and the text will be amended accordingly. The guidance is aimed to provide a strategic approach to wind energy schemes. Although it does not apply to microgeneration, it could apply to schemes involving a range of heights and number of turbines. In order to judge the appropriateness of schemes on a case by case basis the SPD will not stipulate a hub height but instead identify that it does not apply to microgeneration schemes.	Amend paragraph 1.9 "It applies to schemes of less than 50MW which are normally determined by local planning authorities where one or more turbines provide energy either directly to an individual or a group of buildings or for the sole purpose of producing electricity to support the national energy network. It applies to new schemes and extensions to, and re-powering of, existing schemes." Under the new structure this becomes paragraph 1.19 Part 1.
87	103	Support reference to micro generation in paragraph 1.9.	Comments noted	No action required
88	83	Paragraph 1.9 should refer to off site energy potential for micro generation.	This is accepted and text will be added to reflect this potential.	Amend paragraph 1.9 "Micro-generation wind turbines, which are sited on buildings or within their proximity, provide electricity to be used on site with the potential to export any surplus, are becoming more popular..." Under the new structure this becomes paragraph 1.25 Part 1.
89	83	Amend paragraph 1.9 as electricity is not exported to the national grid but moved via the Distribution Network.	It is accepted to amend the terminology to better reflect what happens to the electricity generated. However it is recognised that most people refer to the national grid with this regard, including information to the public on the British Wind Energy Association's website.	Amend paragraph 1.9 "...for the sole purpose of producing electricity to support the national energy network. ..." Under the new structure this becomes paragraph 1.19 Part 1.
90	5, 34, 70, 90, 102, 132, 135	Add more on renewable micro generation	It is not accepted that detailed guidance on micro generation should be provided. The guidance seeks to provide guidance on wind schemes of a single turbine or more that are greater in scale than a standard microgeneration scheme. Due to the small scale nature of micro generation it is not considered to need strategic guidance focused at a county level. In addition, the Government is currently reviewing permitted development rights for householders. This could result in some forms of micro generation not requiring planning permission. The local planning authorities are also developing policies in their Local Development Frameworks to support the provision of micro renewables. Allerdale Borough Council will be producing a SPD on micro renewable generation as part of its Local Development Framework. Text will be added to clarify this point.	Amend paragraph 1.9 "This document does not provide guidance on other renewable energy development, off shore renewable schemes or micro generation. The nature of other renewable schemes is likely to be small with few strategic consequences, such as small scale hydroelectric schemes, or likely to be large and unique, such as large scale hydro electric or a biomass plant. Local planning authorities will deal with such schemes on their own merits in relation to the relevant policy. Off shore schemes are not covered by the land use planning system and it is therefore inappropriate to provide guidance on this. However, where associated infrastructure is proposed on land, this guidance would apply." Under the new structure this becomes paragraph 1.24 Part 1.

ID	Consultee ID	Comments	Response	Action
91	123, 138, 154	The SPD should support locally generated locally used renewable energy.	<p>The SPD provides advice for development of this type that is not considered to be microgeneration. It is not accepted that detailed guidance on microgeneration should be provided. Due to the small scale nature of micro generation it is not considered to need strategic guidance focused at a county level. In addition, the Government is currently reviewing permitted development rights for householders. This could result in some forms of micro generation not requiring planning permission. The local planning authorities are also developing policies in their Local Development Frameworks to support the provision of micro renewables. Allerdale Borough Council will be producing a SPD on micro renewable generation as part of its Local Development Framework. Text will be added to clarify this point.</p>	<p>Amend paragraph 1.9 "This document does not provide guidance on other renewable energy development, off shore renewable schemes or micro generation. The nature of other renewable schemes is likely to be small with few strategic consequences, such as small scale hydroelectric schemes, or likely to be large and unique, such as large scale hydro electric or a biomass plant. Local planning authorities will deal with such schemes on their own merits in relation to the relevant policy. Off shore schemes are not covered by the land use planning system and it is therefore inappropriate to provide guidance on this. However, where associated infrastructure is proposed on land, this guidance would apply." Under the new structure this becomes paragraph 1.24 Part 1.</p>
92	22, 44, 70, 77, 78	Paragraph 1.10 should refer to PPS22 as the primary source of planning guidance and should reflect the importance and need to encourage, rather than restrict, development. It should reflect that it applies throughout the country.	<p>It is accepted that reference to PPS22 should be clear and expanded to more fully reflect it.</p>	<p>Amend paragraph 1.10 "Planning Policy Statement 22: Renewable Energy (PPS22), 2004 sets out the Government's planning policy on renewable energy. The guidance advises that policies in regional spatial strategies and local development documents should promote and encourage, rather than restrict, such development. It encourages renewable energy development across England where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily. PPS22 acknowledges that of all the renewable energy technologies, "wind turbines are likely to have the greatest visual and landscape effects" and that consideration should be given to cumulative impact of wind energy schemes. This Guidance seeks to highlight the range of effects likely with regard to wind energy development, indicates the potential scale of wind development in relation to landscape character and sets out detailed guidance to assist in assessing landscape, visual and cumulative effects." Under the new structure this becomes paragraph 1.9 Part 1.</p>

ID	Consultee ID	Comments	Response	Action
93	77, 83	Should demonstrate how RSS indicative renewable energy targets can be met	It is not accepted that it is the role of the guidance to demonstrate how regional targets can be met. The SPD, in accordance with the recommendations of the Examination in Public of the Cumbria Joint Structure Plan, seeks to provide broad guidance on the landscape capacity of Cumbria and encourage new development to meet/exceed RSS targets. The SPD states that that landscape capacity assessment is indicative and additional references will be added to refer to the need for individual site assessments to be carried out to determine the appropriateness of any scheme, taking account of the environmental, economic and social benefits and/or impacts. This will recognise that, in addition to landscape and visual effects, a range of planning and technical considerations have to be assessed on a site by site basis before the best size and number of turbines acceptable can be established. All of these factors will affect the ability of any locality in the region to meet RSS targets. The JSP dropped reference to the AXIS study targets because the technical basis for the targets was considered inconsistent with PPS22. Instead it was considered more appropriate to include specific indicators for the contribution made to renewable energy development within the overall monitoring framework of the JSP. The new Wind Energy SPD supports the criteria/indicator approach in the JSP.	Add new paragraph to section 1 "However, careful consideration also needs to be given to any effects that may arise from renewable energy schemes. Wind energy schemes are no exception to this. Schemes need to be well designed, reflect local circumstances and demonstrate how any environmental, social and economic impacts have been minimised through careful site selection, design and other measures. These issues will need to be addressed on a site by site basis to determine the most acceptable scheme for a site." Under the new structure this becomes paragraph 1.8 Part 1.
94	84	The scale of development required in order to meet targets should be identified	It is not accepted that it is the role of the guidance to demonstrate how regional targets can be met. The guidance, in accordance with the recommendations of the Examination in Public of the Cumbria Joint Structure Plan, seeks to provide broad guidance on the landscape capacity of Cumbria and the issues that need to be addressed to encourage new development to meet/exceed RSS targets. The landscape capacity sets out the indicative scale of development that could be acceptable in landscape terms only, but does not seek to justify the targets set. However, it is accepted that additional references should be added to refer to the need for individual site assessments to be carried out to determine the most appropriate scale of development, taking account of the environmental, economic and social benefits and/or impacts.	Add new paragraph to section 1 "However, careful consideration also needs to be given to any effects that may arise from renewable energy schemes. Wind energy schemes are no exception to this. Schemes need to be well designed, reflect local circumstances and demonstrate how any environmental, social and economic impacts have been minimised through careful site selection, design and other measures. These are also material planning considerations and as such, these issues will need to be addressed on a site by site basis to determine the most acceptable scheme for a site." Under the new structure this becomes paragraph 1.8 Part 1."
95	77, 87	The emphasis on meeting renewable energy targets should be strengthened.	It is accepted that the guidance should be reviewed to ensure it clearly sets out the role it has in helping facilitating wind development in Cumbria that will contribute to regional targets. When dealing with applications weight will be attached accordingly to the targets identified in the RSS in accordance with PPS22.	Amend paragraph 1.11 "The Regional Spatial Strategy (RSS) for the North West of England contains planning policy and targets for delivering renewable energy and the NW Sustainable Energy Strategy. The indicative capacity break down of the targets for the total generating capacity demonstrate the importance of wind energy development in meeting such targets. For up to date information on the targets consult the RSS. This guidance aims to support the development of wind energy schemes in Cumbria, which will contribute towards meeting the regional targets established in RSS."

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96	44,	Should state that significant weight will be attached to meeting RSS targets	It is accepted that the guidance should be reviewed to ensure it clearly sets out the role it has in helping facilitating wind development in Cumbria that will contribute to regional targets. When dealing with applications weight will be attached accordingly to the targets identified in the RSS in accordance with PPS22.	Amend paragraph 1.11 "The Regional Spatial Strategy (RSS) for the North West of England contains planning policy and targets for delivering renewable energy and the NW Sustainable Energy Strategy. The indicative capacity break down of the targets for the total generating capacity demonstrate the importance of wind energy development in meeting such targets. For up to date information on the targets consult the RSS. This guidance aims to support the development of wind energy schemes in Cumbria, which will contribute towards meeting the regional targets established in RSS."
97	32, 67	Paragraph 1.11 should include reference to the percentage of land that is currently designated. This will restrict meeting the RSS targets that appear to have been set without due regard to such designations.	The SPD refers to the national landscape designations at various points. However it is accepted that a sentence could be added in the section on Cumbria's Context to highlight the restrictions to wind development in national landscape designations and the role of their settings. The SPD acknowledges that parts of Cumbria have more restrictions on them than others through reference to the current policy framework. It is not accepted that the percentage of land with landscape designations should be highlighted in the SPD. Such designations are only one consideration that needs to be taken into account along with other designations and planning issues. However, the SPD does provide an indication of the landscape capacity outside the National Parks taking into account landscape designations and the effect other designations have in shaping landscape character. This identifies that there is potential, in landscape terms only, for further development of wind energy schemes. Any proposals will be judged against a number of criteria set out in the SPD on a case by case basis.	Add text below paragraph 1.17 "Many of the windiest parts of Cumbria fall within national landscape designations. The Lake District National Park, Yorkshire Dales National Park and Arnside and Silverdale, North Pennines and Solway Coast Areas of Outstanding Natural Beauty have been designated as the areas with the highest value landscape in Cumbria. Policies have been put in place to protect the landscape value of these areas and their settings and restrict the level of wind energy development that is likely to take place " Under the new structure this becomes paragraph 1.27 Part 1.
98	22, 32, 77, 104	The SPD doesn't recognise that much of Cumbria has national landscape designations that limit the potential for wind energy schemes.	The SPD refers to the national landscape designations at various points. However it is accepted that a sentence could be added in the section on Cumbria's Context to highlight the restrictions to wind development in national landscape designations and the role of their settings. The SPD acknowledges that parts of Cumbria have more restrictions on them than others through reference to the current policy framework. It is not accepted that the percentage of land with landscape designations should be highlighted in the SPD. Such designations are only one consideration that needs to be taken into account along with other designations and planning issues. However, the SPD does provide an indication of the landscape capacity outside the National Parks taking into account landscape designations and the effect other designations have in shaping landscape character. This identifies that there is potential, in landscape terms only, for further development of wind energy schemes. Any proposals will be judged against a number of criteria set out in the SPD on a case by case basis.	Add text below paragraph 1.17 "Many of the windiest parts of Cumbria fall within national landscape designations. The Lake District National Park, Yorkshire Dales National Park and Arnside and Silverdale, North Pennines and Solway Coast Areas of Outstanding Natural Beauty have been designated as the areas with the highest value landscape in Cumbria. Policies have been put in place to protect the landscape value of these areas and their settings and restrict the level of wind energy development that is likely to take place " Under the new structure this becomes paragraph 1.27 Part 1.

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ID	Consultee ID	Comments	Response	Action
99	22, 24, 70, 77, 81	Should not move away from Axis Study and Areas of Search or should clarify the position of the guide in relation to this study.	<p>It is accepted that the guidance should be reviewed to clearly set out the relationship between it and the Axis study that formed Technical Paper 6 to the Joint Structure Plan (JSP). In this regard, the AXIS study derived indicative targets for a range of renewable energy technologies within each District in Cumbria over the plan period to 2016. The study took account of technical/viability factors as well as planning and environmental issues and enabled the formation of policy criteria in the JSP. These are used to judge applications for different renewable energy technologies. PPS22 states that planning policies that rule out or place constraints on the development of all, or specific types of, renewable energy technologies should not be included in RSS or LDFs without sufficient reasoned justification. Local Planning Authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects (e.g. identifying generalised locations of development based on mean wind speeds, accessibility to electricity network etc). PPS22 advises that technological change can mean that sites currently excluded as locations for particular types of renewable energy development may in future be suitable. It is for this reason that the AXIS study and the Areas of Search were not taken forward into the adopted JSP. To do so, would have been contrary to advice contained in PPS22. The policy criteria/indicator approach now adopted in JSP Policies R44 and R45, supported by the SPD guidance is considered to be a more appropriate expression of the guidance in PPS22. The landscape capacity assessment has been carried out to provide strategic guidance on landscape and did not seek to further refine the 'Areas of Search' contained in Technical Paper 6 for the above reasons.</p>	<p>Amend paragraph 1.15 "...This study was used to inform the development of policy in the JSP. It was not adopted as part of the JSP, nor used to set targets for renewable energy or identify locations for development as PPS22 advises against making assumptions on technical and commercial feasibility of renewable energy projects, and having planning policies that rule out or place constraints on the development of all, or specific types of, renewable energy technologies. As a result this Guidance moves away from broad Areas of Search. It does not identify specific locations where development will be acceptable, however it does provide an indication of landscape capacity at a county wide level. This is obviously only one factor that will be considered by developers as they consider the characteristics and potential effects of appropriate sites for future development." Under the new structure this becomes paragraph 1.17 Part 1.</p>
100	44, 45, 49, 77	Landscape capacity assessment could be restrictive and hinder RSS target delivery	<p>The landscape capacity assessment seeks to facilitate new wind development in Cumbria. The effects on landscape and visual amenity are only two issues that need to be considered when developing a wind energy scheme. There could be other designations or issues that constrain or support development in the future. If targets are difficult to meet due to the high number of designations in the county then the principles of such designations may need reviewing. If this was to be the case then it would be an issue for central government and the local planning authorities. As the findings of the assessment only identify a few areas where it may be inappropriate to site wind turbines it is not accepted that the findings of the assessment will hinder the RSS target delivery. PPS22 acknowledges that the landscape and visual effects of particular renewable energy developments will vary on a case by case basis, according to the type of development, its location and the landscape setting of the proposed development. Proposed development should be assessed using objective descriptive material and analysis wherever possible even though the final decision on the visual and landscape effects will be, to some extent, one made by professional judgment. Policies in local development documents should address the minimisation of visual effects.</p>	<p>No action required.</p>
101	22	Support the recognition that wind energy will be the largest contributor to meeting RSS renewable energy targets.	<p>Comment noted</p>	<p>No action required</p>

ID	Consultee ID	Comments	Response	Action
102	70, 78	Paragraph 1.11 should refer to 'the indicative capacity breakdown of the total generating capacity for onshore wind'.	It is accepted that a reference be made to the indicative capacity being demonstrated through RSS. However as the targets could change over time a reference will be added to consult the RSS for the up to date figures.	Add "The indicative capacity break down of the targets demonstrate the importance of wind energy development in meeting such targets. For up to date information on the targets consult the RSS. This guidance aims to support the development of wind energy schemes in Cumbria, which will contribute towards meeting the regional targets established in RSS." to paragraph 1.12 Part 1 under the new structure.
103	71, 83	Paragraph 1.11 should refer to targets being revised upwards when met and that meeting targets is not a valid reason to refuse further applications.	It is acknowledged that any targets are not considered to be an absolute maximum and that they are indicative only. RSS targets are expressed as minima and could be exceeded. Paragraph 1.11 does not state that further development will not be supported once targets are met. It is not accepted that a statement should be added to say that targets will be revised upwards once they are met. The text will be revised to ensure that the SPD supports targets set in the Regional Spatial Strategy as these are a minima and reflect national targets.	Add "The indicative capacity break down of the targets demonstrate the importance of wind energy development in meeting such targets. For up to date information on the targets consult the RSS. This guidance aims to support the development of wind energy schemes in Cumbria, which will contribute towards meeting the regional targets established in RSS." to paragraph 1.12 Part 1 under the new structure.
104	83	Revise paragraph 1.12 in line with JSP policy R44 to favourably consider wind proposals.	This is accepted and the text should be revised in line with JSP policy R44 for the purpose of continuity.	Amend paragraph 1.12 "Under Policy R44, renewable energy developments will be favourably considered if a number of requirements are met." Under the new structure this becomes paragraph 1.15 Part 1.
105	72	In paragraph 1.12 refer to JSP policy E37 but do not lean too heavily on JSP policy as it will be superseded in due course.	The JSP policies will be valid until they are replaced by RSS, or if saved, Local Development Framework policies. Paragraph 1.12 should be revised to reflect this. It is not considered appropriate to refer to all relevant policies in the JSP beyond those on renewable energy. Many policies apply due to the range of planning related issues that need to be considered, as set out in Part 1. However, it is necessary to include specific information on the renewable energy policies as the SPD will be adopted against these.	Amend paragraph 1.12 "The Cumbria and Lake District Joint Structure Plan 2001-2016 (JSP) supports the increasing use of renewable energy and the need to encourage greater energy efficiency and energy conservation. The policies of the JSP are valid until the Regional Spatial Strategy is adopted. This will then set the strategic policy for renewable energy production. However, it is anticipated that the following policies from the JSP will be saved beyond this period by the Regional Assembly and Government Office of the North West as a transitional arrangement until policies in the Local Development Frameworks are developed. This guidance will then be adopted as part of the Local Development Frameworks." Under the new structure this becomes paragraph 1.13 Part 1. Add to the end of paragraph 1.12 " In addition to these several other policies of the JSP apply and proposals will be judged against these also." Under the new structure this becomes paragraph 1.14.

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106	78	Paragraph 1.14 does not accord with PPS22 and shouldn't state development might be unacceptable.	Paragraph 1.14 refers directly to the adopted policy in the JSP. This policy states that development exceeding a certain size proposed in the national landscape designations is unlikely to be acceptable. As this is still adopted policy it is acceptable to maintain the reference.	No action required
107	82	The SPD doesn't refer to local plan policies and is contrary to PPS12.	The SPD referred to Local Plans and Local Development Frameworks in paragraph 1.16. It is accepted that the reference is short and that this could be strengthened.	Amend paragraph 1.16 "This document provides detailed guidance and interpretation for several existing and saved policies and the emerging policies of the Local Development Frameworks for the Cumbrian Local Planning Authorities. These are set out in appendix 1. It is adopted as a Supplementary Planning Document for the Local Planning Authorities listed on the inside of the front cover. This guidance will be given significant weight when dealing with planning applications." Under the new structure this becomes paragraph 1.18 Part 1.
108	78	Amend paragraph 1.18 as evidence suggests that the rate of growth in the size of turbines will not continue at the same pace as in the past.	The reference to past trends and the expectation that turbines sizes will continue to increase does not state at what rate this is expected. However, it is accepted that this sentence could be deleted without weakening the paragraph.	Delete "Based on past trends these figures are expected to continue to increase" from paragraph 1.18.
109	78	Add the output potential to Table 1 so readers can see that larger turbines have a greater energy producing potential.	It is accepted that this would be useful information to add to the table even though it is already included in paragraph 1.18.	Add a final row to Table 1 labelled Installed Capacity. Add the following figures to the row - 1991 -93 700kw 1994-99 1MW 2000-04 2-2.5MW. Amend corresponding text in paragraph 1.18 accordingly.
110	20, 77, 78	All schemes that are currently in the planning process should be mentioned at 1.19 and shown on map 2	It is accepted that the maps should show the most up to date situation with regard to the current wind energy schemes in Cumbria. It needs to be accepted that this is likely to be out of date by the time the SPD is published, but not irrelevant. The text will be revised to remove the reference to the number schemes found in Cumbria and Map 2 will be revised to reflect the most up to date information prior to adoption (July 2007).	Amend paragraph 4.14 "In the last decade the number of sites that are operational or have permission for non-domestic wind turbine developments has increased significantly outside the Lake District National Park, with a few small scale schemes being developed within the National Park. These are identified in Map 2. The map also shows proposals that have been submitted as planning applications and those that have been refused or dismissed at appeal. The map shows a clustering of schemes in areas where there is the highest wind resource i.e. along the coast of West Cumbria, along the northern fringes of the Lake District National Park, in the Furness area and in the uplands to the north and east of Kendal." Under the new structure this becomes paragraph 1.29 Part 1. Amend Map 2 to reflect the position at July 2007.

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111	60, 81	Support paragraph 1.21 and the fact that the SPD doesn't seek to pre-empt a boundary review.	Comments noted	No action required
112	81	It is incongruous to refer to an out dated policy in paragraph 1.22	Paragraph 1.22 refers to JSP policy R45. This will remain the adopted policy for national landscape designations until it is replaced by RSS, or if saved, Local Development Framework policies. It is considered to be still relevant and to accord with PPS22. This states it is appropriate to refer to the types and sizes of renewable energy development that would be acceptable in national landscape designations. Policy R45 does this and also the flexibility for larger schemes to be judged against other criteria based policies. However due to the deletion of paragraphs 1.23 and 1.24 paragraph 1.22 will be revised.	Amend paragraph 1.22 "If the review process results in the designation of new areas of land as National Park or Area of Outstanding Natural Beauty work changes would be made to the SPD to reflect this. The relevant planning policies will apply to any new additions to nationally recognised landscape designations." Under the new structure this become paragraph 1.32 Part 1.
113	67	Revise paragraph 1.21 and 1.23 to remove contradictions.	It is accepted that these paragraphs should be revised to ensure the SPD does not pre-empt any consultation process and decision on the review of national landscape boundaries.	Delete paragraph 1.23 and 1.24 and amend paragraph 1.22 "If the review process results in the designation of new areas of land as National Park or Area of Outstanding Natural Beauty changes would be made to the SPD to reflect this. The relevant planning policies would apply to any new additions to nationally recognised landscape designations." Under the new structure this become paragraph 1.31 Part 1.
114	20, 28, 64, 71, 79, 85,101, 103, 129	Support/strengthen paragraphs 1.21 - 1.24 on national park boundary review and reference to the Whinash decision and the sites contribution to the wider landscape.	It is not accepted that text on the potential review of national landscape boundaries should be extended or strengthened to discourage development until a decision is made. The SPD should not pre-empt the conclusions of a full review of the boundaries and preclude development in such areas. However if, following a full review and public consultation, the boundaries of the National Parks and Areas of Outstanding Natural Beauty are extended then national policy will apply to such newly designated areas. It is also considered inappropriate to retain paragraph 1.24 which refers to the Whinash Inquiry. Such comments are site specific and considered to be too detailed for such a strategic document. It is also not accepted that the landscape capacity assessment should be amended to reduce the landscape capacity in this area.	Delete paragraph 1.23 and 1.24 and amend paragraph 1.22 "If the review process results in the designation of new areas of land as National Park or Area of Outstanding Natural Beauty changes would be made to the SPD to reflect this. The relevant planning policies would apply to any new additions to nationally recognised landscape designations." Under the new structure this become paragraph 1.32 Part 1.
115	53, 60, 71, 77, 78, 79, 81, 85,103,	Challenge national park boundary review text in paragraphs 1.23 - 1.24 – pre-empts review process and not helpful	It is accepted that the text should not pre-empt a full review process of the national landscape designations. Although paragraphs 1.23 and 1.24 do not set out to pre-empt the review process it is accepted that they could be misinterpreted. It is agreed that they should be deleted to ensure the SPD does not pre-empt the boundary review process. However a new paragraph will be added to say how the SPD would apply if any new designations are made.	Delete paragraph 1.23 and 1.24 and amend paragraph 1.22 "If the review process results in the designation of new areas of land as National Park or Area of Outstanding Natural Beauty work changes would be made to the SPD to reflect this. The relevant planning policies would apply to any new additions to nationally recognised landscape designations." Under the new structure this become paragraph 1.32 Part 1.

ID	Consultee ID	Comments	Response	Action
116	54	The statutory purpose of national landscape designations should be highlighted in paragraphs 1.21 - 1.24	It is accepted that the document should briefly highlight the purpose of the national landscape designations for the purpose of clarity. However the statement will be added to paragraph 1.17 under Cumbria's Context to reflect other comments on landscape designations and the restrictions they have on wind energy development.	Add the following below paragraph 1.17 "Many of the windiest parts of Cumbria fall within national landscape designations. The Lake District National Park and Yorkshire Dales National Park, Arnside and Silverdale, North Pennines and Solway Coast Areas of Outstanding Natural Beauty have the highest value landscapes in Cumbria. Policies have been put in place to protect the landscape value of these areas and their settings, which limits the level of wind energy development that is likely to take place there." Under the new structure this becomes paragraph 1.27 Part 1.
117	17, 56, 129, 150, 151, 154	Turbines should not be located in the Lake District National Park, the Yorkshire Dales National Park, places visible from it or in areas that might become national park in the future.	The SPD refers to the national landscape designations at various points and current policy in the Cumbria Joint Structure plan that only supports wind energy development in the National Park for a single turbine with a hub height of less than 25m. This policy has been developed to recognise the highly valued landscape character of the national landscape designations. The SPD also refers to the need to consider the effects of any future development on the landscape settings of national landscape designations and that development should not cause significant harm to the character of the settings. It would be contrary to national and local planning policy to prevent wind development completely within or outside national landscape designations. However the role of national landscape designations and the limiting effect they might have on future wind energy development will be highlighted in the 'Cumbria's Context' section of the SPD. The SPD acknowledges that parts of Cumbria have more restrictions on them than others through reference to the current policy framework. Any proposals will be judged against a number of criteria set out in the SPD on a case by case basis.	Add text below paragraph 1.17 "Many of the windiest parts of Cumbria fall within national landscape designations. The Lake District National Park, Yorkshire Dales National Park and Arnside and Silverdale, North Pennines and Solway Coast Areas of Outstanding Natural Beauty have been designated as the areas with the highest value landscape in Cumbria. Policies have been put in place to protect the landscape value of these areas and their settings and restrict the level of wind energy development that is likely to take place " Under the new structure this becomes paragraph 1.27 Part 1.
118	131	Vital to preserve the landscape of the Lake District National Park	The SPD refers to the national landscape designations at various points and current policy in the Cumbria Joint Structure plan that only supports wind energy development in the National Park for a single turbine with a hub height of less than 25m. This policy has been developed to recognise the highly valued landscape character of the national landscape designations. The SPD also refers to the need to consider the effects of any future development on the landscape settings of national landscape designations and that development should not cause significant harm to the character of the settings. It would be contrary to national and local planning policy to prevent wind development completely within or outside national landscape designations. However the role of national landscape designations and the limiting effect they might have on future wind energy development will be highlighted in the 'Cumbria's Context' section of the SPD. The SPD acknowledges that parts of Cumbria have more restrictions on them than others through reference to the current policy framework. Any proposals will be judged against a number of criteria set out in the SPD on a case by case basis.	Add text below paragraph 1.17 "Many of the windiest parts of Cumbria fall within national landscape designations. The Lake District National Park, Yorkshire Dales National Park and Arnside and Silverdale, North Pennines and Solway Coast Areas of Outstanding Natural Beauty have been designated as the areas with the highest value landscape in Cumbria. Policies have been put in place to protect the landscape value of these areas and their settings and restrict the level of wind energy development that is likely to take place " Under the new structure this becomes paragraph 1.27 Part 1.

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119	142	The Solway Coast AONB is particularly sensitive to wind turbines and has a role to play in future tourism.	The landscape capacity assessment considers the sensitivity and value of the landscape types for the Solway Coast AONB area. It identifies that they have a low capacity and that it would be generally inappropriate to locate one or more turbines with a hub height of 25m or more there. It also identifies sensitivities associated with the setting of the AONB in adjacent landscape types. The SPD identifies the need for developers to consider the effects of their proposals on the local economy, which for many parts of Cumbria will involve consideration of effects on tourism.	No action required
120	1, 8, 54, 64,	Add more on offshore wind development/seascapes	It is not accepted that the guidance should extend to offshore developments as such projects are not covered by the land use planning system. The SPD currently covers the issue of seascapes in relation to the effects of wind energy development on the character of the coast. As offshore wind energy and other development forms part of the seascapes the SPD highlights the need for consideration to be had on their effects with coastal proposals. It is accepted that additional text could be added to the cumulative effects section to ensure offshore wind schemes are taken into account by assessments of onshore schemes.	Amend text in the cumulative effects text in Part 1 "The combined effect of onshore schemes with offshore schemes also need to be considered in coastal areas." Under the new structure this becomes paragraph 3.2 Part 1. Amend text in Part 2 "Cumulative landscape effects concern the degree to which onshore and offshore wind energy development change the:" Under the new structure this becomes paragraph 1.25 Part 2.
121	34, 57, 67, 74, 75, 84, 87, 99, 102, 103, 128, 129	Support/expand community issues section	Comment noted on support. It is not proposed to expand the section on community issues significantly, but reference will be made to the new Toolkit and Protocol on delivering community benefits issues by DTI and Renewables Advisory Board.	Add to the end of paragraph 2.6 "More details on these are contained in the Protocol for public engagement with wind energy development in England, produced on behalf of the Renewables Advisory Board and DTI. Developers should follow this protocol when dealing with schemes in Cumbria." Under the new structure this becomes paragraph 2.39 Part 1.
122	137	Invite people who have lived near windfarms to advise communities where farms are in planning as to realities of living near them	It is accepted that benefits could be derived from involving people living near wind energy developments when developers are engaging with the local community. A reference to this should be added to paragraph 2.4.	Add to paragraph 2.4 "...As part of this process, developers might consider inviting people who live near wind energy development to meet with local communities to discuss the realities of living near them." Under the new structure this becomes paragraph 2.36 Part 1.
123	78	Support paragraph 2.5 and reference to using a range of communication tools.	Comment noted	No action required
124	67	Amend the last bullet under paragraph 2.7 to provide a more balanced example of local groups that could be used.	It is accepted that the range of groups available across Cumbria that have a view on wind energy development is wide and that this bullet should be amended to reflect this.	Amend the final bullet of paragraph 2.7 "local environmental, interest or other groups could also assist in disseminating information to the local community." Under the new structure this becomes paragraph 2.40 Part 1 last bullet.

ID	Consultee ID	Comments	Response	Action
125	77	Refer to DTI sponsored Delivering Community Benefits Toolkit and Protocol and the fact that the industry is already an exemplar in the extent and variety of community benefits.	It is accepted that a reference should be made to 'The Protocol for Public Engagement with Proposed Wind Energy Developments in England' and the associated 'Toolkit for delivering community benefits'. These have been produced by the Centre for Sustainable Energy on behalf of the government's Renewables Advisory Board and DTI.	Add to the end of paragraph 2.6 "More details on these are contained in the Protocol for public engagement with wind energy development in England, produced on behalf of the Renewables Advisory Board and DTI. Developers should follow this protocol when dealing with schemes in Cumbria." Under the new structure this becomes paragraph 2.39 Part 1. Add to the end of paragraph 2.9 "The Centre for Sustainable Development has recently published a good practice toolkit on benefits for communities, on behalf of the Renewables Advisory Board and DTI. Developers should follow the guidance in this toolkit when developing schemes in Cumbria. This builds on experience elsewhere in Europe where the provision of significant local benefits is built into the heart of wind energy developments..." Under the new structure this becomes paragraph 2.43 Part 1.
126	34, 66, 71, 77, 87	Add more on LPA role with community and raising awareness.	It is accepted that the local planning authorities have a role in raising awareness on wind energy schemes and encouraging community led renewable energy initiatives. Local planning authorities provide planning advice and policy on wind energy schemes at all scales including micro generation, community and commercial. In addition they provide support to several organisations promoting renewable energy and energy efficiency with communities across Cumbria. These include Eden LA21 and local Energy Efficiency Advice Centres. It is accepted that text should be added to the SPD to highlight this role.	Add to paragraph 2.4 "Local planning authorities also have a role in raising awareness of the potential for renewable energy through guidance such as this, training events with councillors and professionals, and supporting a range of community projects promoting renewable energy, such as Eden LA21 and local energy efficiency advice centres. Each planning authorities Statement of Community Involvement sets out how they will engage with communities affected by proposals for major development." Under the new structure this becomes paragraph 2.37 Part 1.
127	66, 71, 87, 102, 104	Add text to require/ensure community ownership in new commercial schemes	The Companion Guide to PPS22, paragraphs 4.9-4.32 highlight the benefits of community led renewable energy schemes. However, it would be contrary to government guidance to require community ownership to be part of the proposal in order for a commercial scheme to go ahead. It is accepted that local planning authorities have a role in encouraging community led renewable energy initiatives. Local planning authorities in Cumbria until recently supported CLAREN which was actively engaging with local communities, providing advice, support and help in accessing funding for community renewable schemes. It is hoped that further support will be provided in the future. Communities could also be eligible for support towards small scale renewable energy schemes through the Sustainable Development Funds managed by the AONBs and National Parks. In the meantime national and local projects are providing advice. Additional text will be added to the SPD to highlight this support.	Add to paragraph 2.4 "...This concept is supported and was pioneered in Cumbria. Experience should be taken from the Baywind scheme and its investment model..." Under the new structure this becomes paragraph 2.43 Part 1.

ID	Consultee ID	Comments	Response	Action
128	53, 66, 78, 81, 83	Paragraph 2.2 should be revised to reflect the fact there is no evidence to demonstrate that wind turbines have a negative effect on shadow flicker, tourism or house prices and that noise is not an issue.	It is accepted that paragraph 2.2 should be revised to distinguish between the range of concerns that might be raised by local communities and the planning issues that need to be addressed. These are further expanded upon in the sections on local amenity and local economy.	Amend paragraph 2.2 "Wind energy developments could have a range of positive or negative effects on nearby communities. They could provide landowners with the opportunity for rural diversification, provide local jobs, and opportunities for community based schemes and educational resources. However, a range of planning related issues are often raised as concerns by the local community. These include landscape and visual effects, noise, shadow flicker and effects to the local economy. Although it is recognised that the concerns raised will often not be significant, and that negative effects may be localised in nature or could be mitigated against, in every case, developers need to consider if wind schemes will have a positive, negative or neutral effect on such issues. More guidance on what is expected is set out in throughout the guidance. In addition to this local communities often raise concerns relating to a reduction in house value, however this is not a relevant planning issue and is not addressed by this guidance." Under the new structure this becomes paragraph 2.34 Part 1.
129	71, 83	Paragraph 2.2 contrary to PPS22 as it does not assess the validity of community causes listed.	It is accepted that the text refers to negative issues only and doesn't identify relevant planning issues from those issues that can't be considered when dealing with a planning application. The text should be revised to be more positive and state which issues will be addressed by a planning application.	Amend paragraph 2.2 "Wind energy developments can have a range of positive or negative effects on nearby communities. They could provide landowners with the opportunity for rural diversification, provide opportunities for community based schemes and educational resources. On the other hand planning related issues that are often raised as concerns by the local community include landscape and visual effects, noise, shadow flicker and effects to the local economy. Developers need to consider if wind schemes will have a positive, negative or neutral effect on such issues. More guidance is given on this in the rest of the section. In addition to this local communities often raise concerns relating to a reduction in house value. This is not a relevant planning issue." Under the new structure this becomes paragraph 2.34 Part 1.
130	75	Support paragraphs 2.3 - 2.4	Comments noted	No action required

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ID	Consultee ID	Comments	Response	Action
131	19	Clarify 'local' at paragraph 2.3	It is not accepted that a definition of local should be included in the SPD. The location and characteristics of a scheme will influence the range of effects it might have, and indicate how far reaching consultation might need to be. For example a scheme of 3 turbines in a small valley might focus on a smaller 'local' community than a scheme of 15 turbines in a broad moorland area.	No action required
132	75	Support paragraphs 2.6- 2.8	Comments noted	No action required
133	78	Delete 'possibly even' from paragraph 2.6 as it prejudices the statement.	This is accepted.	Delete "possibly even" from paragraph 2.6.
134	75	Introduce a reference in 2.5 to link with 2.10 and the role that community benefits can play in creating the feeling of community ownership.	It is accepted that the text could be strengthened to refer to the potential role that community benefits could have in creating a sense of ownership to a project.	Add the following to the end of paragraph 2.6 "...Approaches such as this could help reduce the feeling that communities have no ownership of a scheme, which may be the case if they are presented with a finalised scheme at an exhibition or meeting. Recent studies have also suggested that lack of information or awareness on renewable energy can result in people feeling unable to give positive support." Under the new structure this becomes paragraph 2.38 Part 1.
135	75	Support paragraphs 2.9 - 2.10	Comments noted	No action required
136	56, 135	The economic/financial benefits to residents should be explained and there should be a reference to the number of households that could be supported by a wind turbine.	Section 2 of the SPD sets out the need for developers to engage with communities and includes a reference to community funds. It is common for such funds to provide/improve community facilities. It is not usual for them to directly provide money to individual residents. The amount of energy generated by a turbine will vary with the overall size of the turbine. It is not accepted that the SPD should include information on energy output. This level of detail would be provided on a case by case basis by developers.	No action required

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ID	Consultee ID	Comments	Response	Action
137	83	In paragraphs 2.9 and 2.10 a distinction should be made between community benefit from community funds and relevant planning related requirements.	This is accepted for the purpose of clarity.	Amend paragraph 2.9 "When developing a wind energy scheme developers, should explore the potential for community benefits when engaging with the community. Although benefits that are not required directly as a result of a planning consent are not a material planning consideration, developers in Cumbria are encouraged to work more closely with local communities to explore how wind energy schemes can enhance community interests. However, it should be noted that such benefits will not outweigh any significant environmental harm that might be identified when considering an application. The Centre for Sustainable Development has recently published a good practice toolkit on benefits for communities, on behalf of the Renewables Advisory Board and DTI. Developers should follow the guidance in this toolkit when developing schemes in Cumbria. This builds on experience elsewhere in Europe where the provision of significant local benefits is built into the heart of wind energy developments." Add to the end of paragraph 2.10 "It should be noted that some of the above could be sought as part of a planning permission if they are considered relevant to the proposed development." Under the new structure these become paragraphs 2.42 and 2.43 Part 1.
138	84	Require developers to invest in local energy saving and conservation measures	It is not accepted that it is the role of the guidance to require this. Instead the SPD encourages developers to consider any community benefits that could arise from a scheme and sets out possible approaches that could be taken.	No action required
139	77	Delete the reference to community compensation in paragraph 2.10. This implies communities will be compensated for some losses or disbenefits.	This is accepted and the reference will be deleted.	Amend paragraph 2.10 to refer to community benefits instead of community compensation.
140	67, 78	Delete the reference to amounts of money in paragraph 2.10. This is not helpful and will date the document.	It is accepted that this reference should be deleted and such issues should be negotiated on a case by case basis.	Delete "such contributions have been in the region of £700-1000 per MW installed per year of operation" from paragraph 2.10.

ID	Consultee ID	Comments	Response	Action
141	34, 63	Concept of community funds supported. However emphasis needed on the fact that a package of community benefits will not outweigh significant environmental detriment.	It is accepted that although community benefits should be identified in a planning application that it is unlikely that they would not outweigh other significant environmental effects. It is accepted that paragraph 2.9 should be revised to reflect this.	Amend paragraph 2.9 "When developing a wind energy scheme developers, should explore the potential for community benefits when engaging with the community. Although benefits that are not required directly as a result of a planning consent are not a material planning consideration, developers in Cumbria are encouraged to work more closely with local communities to explore how wind energy schemes can enhance community interests. However, it should be noted that such benefits will not outweigh any significant environmental harm that might be identified when considering an application." "The Centre for Sustainable Development has recently published a good practice toolkit on benefits for communities, on behalf of the Renewables Advisory Board and DTI. Developers should follow the guidance in this toolkit when developing schemes in Cumbria. This builds on experience elsewhere in Europe where the provision of significant local benefits is built into the heart of wind energy developments..." Under the new structure these become paragraphs 2.42 and 2.43 Part 1 respectively.
142	103	Paragraphs 3.1 and 3.5 are inaccurate as the capacity assessment does not include the Lake District National Park.	It is accepted that the existing text setting out the limitations of the SPD with regard to the LDNPA could be referred to earlier on in the section on landscape in the SPD. The landscape character classification of the landscape of the national park is being carried out during the summer of 2007. Once this is finalised the LDNPA will consider whether or not it is appropriate to amend the SPD in the light of it and to carry out a detailed landscape capacity assessment within the park. This is currently reflected in paragraph 3.5. Under the new structure section 3, Part 1 will be removed from Part 1, revised and integrated with a new Part 2.	Revise the introductory text to Part 2 with regard to the landscape capacity assessment and LDNPA.
143	114	Amend paragraphs 3.2 and 3.6 to highlight it refers to landscape issues only.	It is accepted that clarification is needed on guidance that applies to landscape and visual issues to ensure developers are aware all other issues also need to be considered. The SPD will be revised to provide general guidance on environmental issues in part 1 and move all guidance on landscape and visual issues to part 2. This paragraph will be deleted from Part 1 and be moved and reviewed in Part 2.	Move section 3 to Part 2.
144	77	The SPD should not prescribe the size of development appropriate in paragraph 3.2.	It is not accepted that the landscape capacity approach is unacceptable nor that when considering landscape capacity a reference to the scale of development shouldn't be made. However, it is accepted that the text in section 3 should be moved to Part 2 as part of a restructure of the SPD. This will see Part 1 providing general advice on planning issues and Part 2 providing specific advice on landscape and visual issues. Moving section 3 will ensure it is read in accordance with the full landscape capacity methodology and reduce misinterpretation and misunderstanding.	No action required
145	67	Support the reference in paragraph 3.3 that every site is unique.	Comment noted	No action required

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146	45, 72, 79	Support the reference in paragraph 3.3 that guidance shouldn't be used in a definitive sense or negate the need for individual site assessment.	Comments noted	No action required
147	77	Paragraph 3.3 should be amended as it is considered the SPD will be used in a definitive sense.	It is not accepted that the SPD will be used as suggested by the consultee. However it is accepted that the current reference is negative and should be more balanced, recognising that site specifics will influence whether or not a scheme is acceptable or unacceptable. As part the overall review of the structure of the SPD this section and paragraph will be moved to Part 2. This will focus on landscape and visual guidance only. Part 1 will provide guidance on all other planning issues.	Move paragraph 3.3 to Part 2 and amend "However, it only provides an indication of the relative capacity of different landscapes. It should not be used in a definitive sense, ie to mean that a particular proposal would be acceptable or unacceptable on any given site. Every site is unique, and any proposal involving wind turbines must be accompanied by an Environmental Impact Assessment or planning statement (depending on its size) that includes a detailed landscape and visual impact assessment following to the guidance set out in section 3, Part 2." Under the new structure this becomes paragraph 1.7 Part 2.
148	60	Paragraph 3.3 should also reflect that the SPD will be used to determine the acceptability of proposals and not just the unacceptability of them.	This is accepted and is clearly the purpose behind the SPD and landscape capacity assessment. The paragraph will be amended to reflect this. As part the overall review of the structure of the SPD this section and paragraph will be moved to Part 2. This will focus on landscape and visual guidance only. Part 1 will provide guidance on all other planning issues.	Move paragraph 3.3 to Part 2 and amend "...It should not be used in a definitive sense, ie to mean that a particular proposal would be acceptable or unacceptable on any given site..." Under the new structure this becomes paragraph 1.7 Part 2.
149	103	Paragraph 3.3 should require developers to carry out their own detailed capacity assessment within the NP or where schemes would be visible from it.	This is not accepted. However, in line with government guidance developers are expected to consider the effect of a proposal on the landscape character of an area. In doing this they will consider whether or not their scheme can be accommodated by the receiving landscape without causing unacceptable harm. As a result of this process they will be considering the landscape capacity of the area.	No action required
150	6, 45	Amend paragraph 3.3 to reflect the fact that proposals may be appropriate in areas with a high sensitivity and equally inappropriate in areas with a low sensitivity. This will only be determined on a site by site case.	This is accepted. The Landscape Capacity Assessment provides a broad strategic view of the potential capacity of a landscape character type. It does not set out the capacity of each sub type or more local scale areas. Therefore it is perfectly feasible that the particular characteristics of a proposal, its site and local landscape character may show a higher or lower capacity. In order to establish this detailed work would need to be carried out by the developer.	Move paragraph 3.3 to Part 2 and amend "However, it only provides an indication of the relative capacity of different landscapes. It should not be used in a definitive sense, ie to mean that a particular proposal would be acceptable or unacceptable on any given site. Every site is unique, and any proposal involving wind turbines must be accompanied by an Environmental Impact Assessment or planning statement (depending on its size) that includes a detailed landscape and visual impact assessment following to the guidance set out in section 3, Part 2." Under the new structure this becomes paragraph 1.7 Part 2.

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ID	Consultee ID	Comments	Response	Action
151	16	The visual effect of development outside the National Park (Lake District) and offshore should not prevent new development.	The SPD does not seek to prevent development outside the National Parks or Areas of Outstanding Natural Beauty. In accordance with PPS22 it reflects the need for developers to consider the effect of any proposal on the landscape setting of nationally designated landscapes.	No action required
152	64, 72	Add 'Public access' as an extra bullet under paragraph 3.10	This paragraph refers to the detailed landscape capacity assessment methodology set out in Part 2. It would not be appropriate to add a reference to public access as it did not form part of the overall methodology used to determine value. It was not used in the overall methodology as details, number and uncertainties about popularity of such areas makes its inclusion as part of a strategic capacity assessment impractical.	No action required
153	81	Support the 6 typologies in paragraph 3.12	Comments noted	No action required
154	82	In paragraph 3.12 clarify the definition of small/medium and large scale wind developments.	Paragraph 3.12 defines the six scales of development that are referred to in the landscape capacity assessment. It is not accepted that this requires further clarification.	No action required
155	77	Paragraph 3.12 does not appear to distinguish between the low/moderate and moderate scales of development.	The table in paragraph 3.12 is an extract from the landscape capacity methodology text in Part 2. For the purpose of clarity this table and section 3 text will be deleted from Part 1 and only included in Part 2.	Delete section 3 text and tables from Part 1 and include in revised part 2 only.
156	22, 66, 77, 83	Paragraph 3.14 should recognise turbine size is dictated by market availability.	It is accepted that wind energy manufacturers may only be producing turbines of certain sizes. However when selecting a site developers need to ensure that the size of turbine available will be acceptable on that particular site, taking into account the landscape characteristics associated with it. The text will be revised and included at the beginning of the design and siting section in Part 1. Section 3 is being deleted from Part 1 as it is landscape specific and relevant text will be moved to Part 2. This will focus specifically on landscape issues as part of the revised structure to the SPD.	Add to new paragraph 4.2 Part 1 "The process of site selection, design and mitigation should be an iterative process informed by and responding to an ongoing environmental assessment. The full range of planning issues set out in section 2 should be set alongside economic and technical requirements from the outset of a project and throughout all stages of its development. However, economic and technical issues associated with wind energy development, such as the wind resource in the area and the cost of developing a project, are not material planning considerations and would not be taken into account when making a decision."

ID	Consultee ID	Comments	Response	Action
157	78	Delete 'would not generally be appropriate' from the table under paragraph 3.15 as gains of a scheme might outweigh any environmental impacts.	It is not accepted that the table should be changed. The table is an extract from Part 2 and relates to the methodology used for the landscape capacity assessment. It is recognised throughout the guidance that circumstances might arise where an adverse effect of a scheme is outweighed by other benefits of a scheme. However, as a result of the consultation the SPD is being restructured and this table and the text in section 3 will be deleted from Part 1, and where relevant moved to Part 2. This will focus specifically on landscape issues as part of the revised structure to the SPD.	It is not accepted that the table should be changed. The table is an extract from Part 2 and relates to the methodology used for the landscape capacity assessment. It is recognised throughout the guidance that circumstances might arise where an adverse effect of a scheme is outweighed by other benefits of a scheme. However, as a result of the consultation the SPD is being restructured and this table and the text in section 3 will be deleted from Part 1, and where relevant moved to Part 2. This will focus specifically on landscape issues as part of the revised structure to the SPD.
158	44, 45	Delete reference to schemes not being appropriate where there is a low landscape capacity in the table in paragraph 3.15. Appropriateness of a scheme is based on more than just landscape sensitivity.	It is not accepted that the table should be changed. The table is an extract from Part 2 and relates to the methodology used for the landscape capacity assessment. It is recognised throughout the guidance that circumstances might arise where an adverse effect of a scheme is outweighed by other benefits of a scheme. However, as a result of the consultation the SPD is being restructured and this table and the text in section 3 will be deleted from Part 1, and where relevant moved to Part 2. This will focus specifically on landscape issues as part of the revised structure to the SPD.	It is not accepted that the table should be changed. The table is an extract from Part 2 and relates to the methodology used for the landscape capacity assessment. It is recognised throughout the guidance that circumstances might arise where an adverse effect of a scheme is outweighed by other benefits of a scheme. However, as a result of the consultation the SPD is being restructured and this table and the text in section 3 will be deleted from Part 1, and where relevant moved to Part 2. This will focus specifically on landscape issues as part of the revised structure to the SPD.
159	67	Support Table 2 reference to the landscape assessment showing the potential of the landscape to accommodate a single wind energy development of a certain scale.	Comment noted. However this statement is intended to explain that the capacity expressed for each type and indicates its ability in principle to accommodate a certain scale of development. It also guards against interpretation that it in any way indicates cumulative capacity. As Part 1: Chapter 4 explains determining cumulative capacity can only be undertaken on a case by case basis at the time of any planning application. Spatial extent and geographical distribution of each type will also influence scope for multiple developments. Spatial extent determines capacity in a physical sense (space available) and is very different to rarity which is based on the relative sizes of landscape types or sub-types. The text should be revised to provide clarification on this matter.	Amend paragraph 3.18 "...This doesn't mean that only one more development would be acceptable in each landscape character type. It indicates the scale of development that might be suitable; however whether or not a scheme is acceptable on any given site would be determined by a full landscape and visual impact assessment and consideration of any cumulative effects. If cumulative effects are likely an assessment should follow the guidance set out in section 3 to determine if the proposal is acceptable..." Under the new structure this becomes paragraph 1.16 Part 2.
160	78	Table 2 should be reviewed completely.	Table 2 is an extract of Part 2 and refers to a detailed landscape capacity assessment findings. A more detailed analysis of consultation responses to Part 2 is covered elsewhere in this document. In order to reduce confusion and clarify the role of the landscape capacity assessment, its findings will only be referred to in Part 2. Section 3, including Table 2 will be deleted from Part 1. Relevant text will be moved to Part 2.	Delete Table 2 and section 3 text from Part 1 and move to Part 2, where relevant.

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161	103	Paragraph 3.18 should be redrafted to refer to the characteristics of some landscape types.	This is accepted in part.	Revise the 4th sentence of paragraph 3.18 “...The scale of development suggests, for some landscape types, that in exceptional circumstances the characteristics of an area might support a larger development...” Under the new structure this moves to Part 2 and becomes paragraph 1.16.
162	103	Paragraph 3.19 should not refer to 12km as this could limit the assessment of long range views across several landscape types.	It is accepted that the 12km could be seen as limiting the areas to be assessed. It is accepted that this can be deleted.	Delete (within 12km of a site) from paragraph 3.19.
163	71	Reference to 12km is overly restrictive in paragraph 3.19.	It is not accepted that this is overly restrictive, however it is accepted that it should be deleted and assessments should be carried out to reflect the topography and landscape types of an area.	Delete (within 12km of a site) from paragraph 3.19.
164	72	Support recognition of landscape effects traversing landscape types in paragraph 3.19. Potential to make this stronger.	Comment of support noted. It is considered that an appropriate level of reference is already made to this issue throughout the SPD.	No action required
165	78	Development should not be constrained by its neighbouring designations as referred to in paragraphs 3.20 and 3.22.	PPS22 specifically says that "local planning authorities should not create buffer zones around international or nationally designated areas. The SPD does not introduce buffer zones or seek to unnecessarily constrain development adjacent to national designations. Paragraph 3.22 sets out the need for an assessment of the effects of a scheme on the 'setting' of a national landscape designation, in accordance with guidance contained in PPS22. This highlights that the potential impact of renewable energy schemes close to the boundary of designated areas is a material consideration to be taken into account when determining planning applications. 'Settings' to national landscape designations are not physically defined, and the text highlights the need for a landscape and visual impact assessment to be carried out to determine whether or not a scheme has an effect on any 'setting'. A reference will be added to clarify the legitimacy of referring to 'settings' of landscape designations. Under the new structure this text will move to Part 2.	No action required

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166	23, 64	Paragraph 3.20 should acknowledge that two of the AONBs cross into other counties and should note that part of the Yorkshire Dales NP is in Cumbria.	This is accepted and the text should be amended.	Amend paragraph 3.20 "In Cumbria the Lake District National Park, a small part of the Yorkshire Dales National Park, the Arnside and Silverdale, North Pennines and Solway Coast Areas of Outstanding Natural Beauty account for the County's national landscape designations. Both Arnside and Silverdale and the North Pennines AONBs cross the border into other counties. The Forest of Bowland AONB, in Lancashire and the rest of the Yorkshire Dales National Park, situated in North Yorkshire, are national landscape designations that might also be affected by proposals in Cumbria." Under the new structure this moves to Part 2 and becomes paragraph 1.18.
167	23	Inherent problem with how proposals will be assessed within NPs and AONBs – approach of guidance more liberal than the Structure Plan	The SPD provides guidance for development within national landscape designations and accords with PPS22. It is not accepted that the SPD is more liberal than the JSP its main purpose is to provide guidance to help implement these policies. It is complementary to JSP policies. The landscape capacity assessment is the only part of the SPD that does not provide details on the Lake District NP, but does on the AONBs. It also provides advice on the settings of both the Lake District and Yorkshire Dales National Parks and AONBs.	No action required
168	60	The word harm in paragraph 3.21 and 3.22 should follow direct quotes from the JSP policies.	This is accepted and the paragraph will be revised and moved to Part 2.	Amend paragraph 3.21 by adding "...in order to be considered favourably must meet a range of criteria..." Amend reference to harm with effects in the second sentence of paragraph 3.22 and replace the reference to harm in the penultimate sentence with unacceptable adverse effects. Under the new structure these become paragraphs 1.19 and 1.20 Part 2.
169	64	In paragraph 3.22 for Arnside and Silverdale AONB a height of 15m is likely to be more appropriate.	It is not accepted that the SPD should state a lower level than adopted Joint Structure Plan policy. To do so would be contrary to PPS22. Any development coming forward in a landscape designation would need to demonstrate that no intrinsic harm would result on a case by case basis.	No action required
170	103	Support paragraph 3.22.	Comment noted. However due to other comments received this paragraph will be amended to strengthen the reference to settings.	Revise paragraph 3.22 "...A detailed assessment of any proposal must pay particular attention to the reason the landscape was designated, the qualities that they are now valued for and any effects on their settings. The settings to such areas are often highly valued by local communities and visitors alike..." Under the new structure this moves to paragraph 1.20 Part 2.

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171	44	Rigorous assessment needed in areas of high wind speed adjacent to landscape designations	The SPD identifies in paragraph 3.22 the need for an assessment of the effects of a scheme on the setting of a national landscape designation. This accords with guidance contained in PPS22. All assessments carried out are expected to be rigorous and it is accepted that the text could be strengthened to show that a detailed assessment would be expected.	Revise paragraph 3.22 "...A detailed assessment of any proposal must pay particular attention to the reason the landscape was designated, the qualities that they are now valued for and any effects on their settings. The settings to such areas are often highly valued by local communities and visitors alike..." Under the new structure this moves to paragraph 1.20 Part 2.
172	103	Delete text in paragraph 3.22 that essentially sets buffer zones/restricts development outside national landscape designations.	The SPD does not introduce buffer zones or seek to unnecessarily restrict development adjacent to national designations. Paragraph 3.22 sets out the need for an assessment of the effects of a scheme on the 'setting' of a national landscape designation, in accordance with guidance contained in PPS22. This highlights that the potential impact of renewable energy schemes close to the boundary of designated areas is a material consideration to be taken into account when determining planning applications. 'Settings' to national landscape designations are not physically defined, and the text highlights the need for a landscape and visual impact assessment to be carried out to determine whether or not a scheme has an effect on any 'setting'. A reference will be added to clarify the legitimacy of referring to 'settings' of landscape designations.	Revise paragraph 3.22 "In accordance with PPS22, settings of the national landscape designations also need to be taken into account. As these are not defined the extent and effect of such designations will need to be considered and evaluated on a site by site basis as part of the landscape and visual impact assessment. The potential effects of a proposal could have a greater significance to both designated areas and their settings. A detailed assessment of any proposal must pay particular attention to the reason the landscape was designated, the qualities that they are now valued for and any effects on their settings. The settings to such areas are often highly valued by local communities and visitors alike..." Under the new structure this moves to paragraph 1.20 Part 2.
173	67	Paragraph 3.22 should refer to English Heritage's 'Wind energy and the historic environment' document.	It is not accepted that a reference to this document should be made here. The SPD will be restructured to include in Part 1 information on the full range of issues that a wind energy development could effect, and Part 2 will include specific details on landscape and visual issues. As a result section 3, Part 1 will be revised and moved to Part 2. A reference is already made to this document in the cultural heritage section in Part 1 as a signpost additional guidance. This reference will remain in section 2, Part 1.	No action required
174	103	Don't adopt until LDNPA landscape work included.	It is not accepted that the SPD should not be adopted until corresponding work has been carried out by the Lake District National Park Authority. The current Structure Plan policy only supports wind energy development in the National Park for a single turbine with a hub height of less than 25m. If larger schemes than this come forward in the LDNPA they would be considered as a major development and an assessment of its effects on the landscape character would need to be carried out by the developer. The landscape character classification of the landscape of the national park is being carried out during the summer of 2007. Once this is finalised the LDNPA will consider whether or not it is appropriate to amend the SPD in the light of it and to carry out a detailed landscape capacity assessment within the park. This is currently reflected in paragraph 3.5. The text should be revised to highlight that further capacity work may be carried out if considered appropriate.	Revise paragraph 3.5 to reflect that further consideration will be given to carrying out a landscape capacity assessment of the national park following completion of the landscape character work.

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ID	Consultee ID	Comments	Response	Action
175	80	Include a map showing LDNPA landscape classification.	A map of the lake district landscape character will not be available until the end of 2007 as the work to classify the landscape character is currently being undertaken. It is not possible to include a map of the LDNPA's landscape character yet.	No action required
176	63, 79 74 103	Table 2 and map 4 in part 1 should include a caveat to ensure that if read in isolation people understand that there is not an automatic presumption in favour of development on landscape grounds. All issues need to be considered. Text in type 4 should be	It is accepted that a caveat should be added to the table and map to ensure they are not read isolation of the full capacity sheets and that landscape capacity isn't focused on at the expense of other relevant issues. However table 2 will move to Part 2 as part of the revised structure of the SPD and become Table 1. It is not accepted that the text in Type 4 should be more precise as it is a summary of the full capacity assessment sheets and should be read in conjunction with them. Although common land is not defined as part of the landscape capacity assessments open access land is and will be referred to in Part 3 and Appendix 1.	Add the following reference to table 2 and map 4 "A summary of the capacity of each of the County's landscape types to accommodate wind energy development is provided in Table 1 and illustrated in Map 8. An indication of the appropriate scale of development is also provided in the table. This information and Map 8 should not be used in isolation. They must be read in conjunction with the sensitivity and value assessment sheets set out in the next section and the rest of the guidance in Part 1 and Part 2." This will become Table 3, Part 2.
177	20, 28, 30, 42, 50, 57, 62, 67, 72, 99	Support cumulative effects text.	Comment noted	No action required
178	60	Siting and Design text should come before Cumulative Effects text.	This is not accepted as it is important to be aware of potential cumulative effects when considering the siting and design of a scheme, and therefore as logical to be aware of cumulative issues ahead of reading about design and siting details.	No action required
179	35, 61, 74, 106	Cumulative text should cover all relevant issues, not just landscape and visual.	It is accepted that cumulative issues are not isolated to landscape and visual effects. The SPD currently focuses only on the cumulative effects of these issues. It is accepted that the text should be added to identify the range of cumulative effects that need to be considered by any wind proposal, where another already exists/is proposed. Cumulative text on broader issues will be added to Part 1. However PPS22 recognises that cumulative landscape and visual effects need to be taken into account and should be assessed on a site by site basis. Therefore it is still considered acceptable to provide specific guidance on cumulative landscape and visual effects. As part of the restructure of the SPD the detailed information on landscape and visual issues will be moved to Part 2 of the SPD.	Revise text in section 4 Part 1 to highlight the range of cumulative effects that could be experienced. Under the new structure this becomes section 3, Part 1. More detailed advice relating only to landscape and visual effects will be moved to Part 2 under the new structure.
180	82	The document lacks guidance on identifying specific areas suitable for wind development and the maximum number of turbines likely to be approved at such sites.	The guidance provides detailed guidance on a range of issues that need to be considered when a developer is selecting a site. It contains details on landscape capacity, with indications of the appropriate scales of development and sets out some key considerations that need to be taken into account if wind development is already present or planned in an area. It is not accepted that the SPD should set thresholds or maximum numbers to prevent unacceptable cumulative effects. This can only practically be determined on a case by case basis once the site and landscape characteristics, and the nature of the scheme are known. It is up to the developer to demonstrate the cumulative effects, if any, for any given site taking into account the full range of issues associated with it. The local planning authority will then make a judgment as to whether or not the scheme is acceptable in cumulative terms.	No action required

ID	Consultee ID	Comments	Response	Action
181	139	Cumulative text should give greater emphasis to the density of wind turbines in any one area.	The guidance provides detailed guidance on a range of issues that need to be considered when a developer is selecting a site. It contains details on landscape capacity, with indications of the appropriate scales of development and sets out some key considerations that need to be taken into account if wind development is already present or planned in an area. It is not accepted that the SPD should set thresholds or density levels to prevent unacceptable cumulative effects. This can only practically be determined on a case by case basis once the site and landscape characteristics, and the nature of the scheme are known. It is up to the developer to demonstrate the cumulative effects, if any, for any given site taking into account the full range of issues associated with it. The local planning authority will then make a judgment as to whether or not the scheme is acceptable in cumulative terms.	
182	71, 77	SNH study may not be appropriate. It is dated, not peer reviewed and was designed for use in Scotland.	This is not accepted. Version 2 of the cumulative guidance referred to at paragraph 4.6 is only 2 years old. PPS 22 Companion Guide, which was subject to a consultation process, provides guidance on assessing cumulative effects (5.24). It refers to SNH's considerable experience in dealing with cumulative impact issues and the good practice guidance they have prepared for their own and wider use. It goes on to set out key points derived from this SNH cumulative guidance thereby affirming its credibility. It deals with concepts, definitions and assessment methodology and is therefore essentially generic.	No action required
183	63	Map 1 shows the Solway Plain as a potential focus for wind developments. This highlights the need to emphasise the rigorous assessment of landscape visual and cumulative effects in the area.	This comment of support for detailed guidance on landscape, visual and related cumulative effects is noted. The layout of the SPD will be revised to include detailed information on landscape, visual and related cumulative effects in Part 2. Part 1 will focus on more general advice on wind energy development.	No action required
184	72, 74	Support reference to seascape in paragraph 4.2	Comments noted	No action required
185	71	References to cumulative effects and offshore schemes is against the spirit of PPS22.	This is not accepted. When carrying out landscape character assessments of a development along the coast it is important that consideration is given to the full range of characteristics found in a coastal area. This will include both onshore and offshore characteristics. It is not considered appropriate to exclude offshore developments, such as wind, gas or oil infrastructure, if these are considered to contribute to the overall character of an area. The landscape capacity assessment and guidance currently covers the issue of seascape with regard to wind energy development along the coast and the effect it has when seen along the coast in relation to on and offshore schemes. In response to other comments, It is accepted that additional text could be added to the cumulative effects section to ensure offshore wind schemes are taken into account by assessments of onshore schemes.	Amend paragraph 4.2 "The combined effect of onshore schemes with offshore schemes also need to be considered in coastal areas." In Part 2 amend paragraph 1.23 "Cumulative landscape effects concern the degree to which onshore and offshore wind energy development change the:" Under the new structure these become paragraphs 3.2 Part 1 and 1.25 Part 2.
186	67	A reference to cumulative effects cutting planning authority boundaries outside the county should be made.	This is accepted and a sentence will be added for the purpose of clarity.	Add the following to paragraph 4.2 "Cumulative effects should also be considered with neighbouring areas outside Cumbria." Under the new structure this becomes paragraph 3.2 Part 1.

ID	Consultee ID	Comments	Response	Action
187	72	Include a landscape assessment of the Cumbria's offshore areas to establish the current impact of schemes.	It is not accepted that such an assessment should be carried out and form part of the SPD. The landscape capacity assessment and guidance currently covers the issue of seascape with regard to wind energy development along the coast and the effect it has when seen along the coast in relation to on and offshore schemes. The detailed cumulative effects of proposals along the coast would need to be assessed on a scheme by scheme basis.	No action required
188	72, 103	Expand the discussion on the setting of the National Park in paragraph 4.2.	It is not accepted that this should be strengthened as paragraph 3.22 already expands on the issue of settings to designated landscapes. Under the revised structure paragraph 3.22 (and the rest of section 3) will be moved from Part 1 to Part 2. Part 2 will provide specific advice on landscape and visual effects of wind energy development.	No action required
189	63, 103	Support the principle that unacceptable cumulative effect can, on its own, provide sufficient justification to refuse permission for a scheme that might be otherwise acceptable – paragraph 4.3.	Comment noted	No action required
190	78	Paragraph 4.3 should be revised so schemes are not rejected on the grounds of perceived cumulative effect.	This paragraph does not suggest schemes would be rejected on such grounds. However, it is accepted that text could be added to clarify the cumulative effects would need to be demonstrated by the development.	Add to the paragraph 4.3 following the italics "...Such effects would need to be demonstrated..." Under the new structure this becomes paragraph 3.3 Part 1.
191	77	The adoption of a strategic approach to wind in Cumbria should accept that there are likely to be cumulative effects due to a greater concentration of development in certain areas, but that these won't necessarily be unacceptable.	It is accepted that circumstances could arise where new development could be located in areas where there is existing development without causing harmful cumulative effects. The text should be revised to reflect this.	Amend paragraph 4.3 "...Such effects would need to be demonstrated. The case could arise where it can be demonstrated that cumulative effects are unacceptable and may, on its own, provide sufficient justification to refuse a scheme that is otherwise acceptable. Equally it could be demonstrated that new proposals could be located in proximity to other schemes without causing adverse cumulative effects." Under the new structure this becomes paragraph 3.3 Part 1.
192	85	Expand the term 'scale of landscape' at the end of paragraph 4.4 with regard the high altitudes of the Yorkshire Dales National Park.	This is not accepted. There have been several objections lodged against the second part of this paragraph. It is considered that it contradicts the first part of the paragraph and there are many varying factors that need to be taken into account on a site by site basis. This is accepted and as a result the rest of the paragraph from 'However,...' will be deleted.	Amend paragraph 4.3 "...Such effects would need to be demonstrated. The case could arise where it can be demonstrated that cumulative effects are unacceptable and may, on its own, provide sufficient justification to refuse a scheme that is otherwise acceptable. Equally it could be demonstrated that new proposals could be located in proximity to other schemes without causing adverse cumulative effects." Under the new structure this becomes paragraph 3.3 Part 1.

ID	Consultee ID	Comments	Response	Action
193	60, 61, 79, 81	Delete the second part of paragraph 4.4 as it contradicts the first part and the onus should be on the developer to prove the relevant separation distance. Distances might not be relevant for species.	It is accepted that reference to distances is contradictory and might not reflect non landscape cumulative effects. The text will be deleted.	Revise 4.4 "This Guidance does not stipulate separation distances or the number of schemes that might be accommodated in the County as these are likely to vary depending on the details of a scheme and the issue being considered, such as landscape character or nature conservation interest. The consideration of cumulative effects can only be undertaken on a case by case basis in the light of existing baseline conditions, accurate descriptions and visualisations of effects on key receptors, and relationships with other developments. These are impossible to predict at a broader level." Under the new structure this becomes paragraph 1.24 Part 2.
194	60	Paragraphs 4.6 - 4.13 and 4.27 and 4.35 are repetitive with Part 3. Suggest these should be combined with Part 3. 4.10-4.13 technical - move to Part 3 .	It was considered important to inform a wide audience about the general concepts and definitions pertaining to cumulative effects and set out broad guidance on requirements for assessment and acceptability judgements through Section 4. Part 3 goes a step further into specific guidance on assessment of effects and is primarily aimed at landscape architects. In that sense it mirrors the approach taken in the SNH cumulative guidance (2005) where requirements for assessment of cumulative landscape and visual effects under EIA regulations are separated out from the general guidance into an appendix. Under the new structure detailed text in section 4 will move to Part 2. Part 2 will include detailed information on landscape and visual effects comprising the landscape capacity assessment, details on cumulative effects, siting and design (taken from former sections 4 and 5 from Part 1) and the specific guidance formally contained in part 3.	Revise the structure to move details on landscape and visual effects from sections 4 and 5, Part 1, to an improved Part 2. Part 2 will focus on landscape and visual effects only and include the above, the landscape capacity assessment and be merged with the details contained in Part 3. General information on siting and design and cumulative effects that could apply to other issues associated with wind development will remain in Part 1.
195	23	The reference to physical fabric is irrelevant in paragraph 4.7 landscape character is more important.	This is not accepted. The references in the SPD are taken from advice developed in the companion guide to PPS22. The physical fabric of any landscape help define the overall landscape characteristics and would be intrinsic to determining any overall effects on landscape character.	No action required
196	78	Remove the underlining to paragraphs 4.7 and 4.9.	Accepted.	Remove the underlining to paragraphs 4.7 and 4.9.
197	71	Paragraph 4.12 unacceptable and cumulative assessments should only look at other wind farms not all vertical structures.	It is not accepted that cumulative assessments should be restricted to other wind farms only. Recent experience of proposals in Cumbria has highlighted that combined effects with other types of manmade verticals such as masts and pylons are increasingly pertinent. Cumulative considerations arise regarding the degree to which vertical features become a characteristic, visual confusion between different forms and patterns of verticals, the way they relate to the landscape and visual separation between vertical developments.	No action required
198	103	Support paragraphs 4.14 – 4.26	Comments noted	No action required.
199	60	Paragraphs 4.14 – 4.26 should be deleted as they will quickly become obsolete to the document, reducing its relevance and credibility.	It is not accepted that these paragraphs on Cumbria's context should be deleted. These provide a baseline of information for development to take account of and highlight some of the issues that are likely to be of relevance now and into the future.	No action required.

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200	23	Issues in paragraphs 4.15 – 4.25 should be generic rather than applying only to certain areas.	These paragraphs set out the baseline conditions in several broad areas of Cumbria. It is not accepted that they should be generic as each area has different characteristics and circumstances. These paragraphs reflect this.	No action required
201	23	Paragraph 4.14 should be more concise.	It is accepted that this paragraph could be made more concise.	Amend para 4.14 "During the last decade the wind resource in and around Cumbria has been tapped by over 20 on and offshore schemes. There has been a marked clustering of schemes in areas with the highest wind resource, but this may change in the future as technology enables schemes to be built in areas with lower wind speeds. The following text highlights the range of issues that might need to be assessed as new scheme come forwards in these areas." Under the new structure this becomes paragraph 3.8 Part 1.
202	71	Paragraph 4.17 unacceptably negative.	It is accepted that this paragraph could be seen to be negative.	Delete paragraph 4.17 and replace with "The high wind resource and proximity to the 33kv power lines provide good technical conditions for wind energy development along the coast. Developers will need to consider how best to design and site new schemes to be compatible with the characteristics of older schemes." Under the new structure this becomes paragraph 3.11 Part 1.
203	78	Amend paragraph 4.19 as there are 2 round 2 offshore schemes and the Ormond hybrid scheme, not 4.	It is accepted that the text should be revised to better reflect the full extent of offshore schemes around Morecambe Bay, Walney and the Duddon Estuary.	Amend paragraph 4.19 to include "A total of five onshore schemes (32 turbines), of up to small wind farm size, have been built. A 30 turbine scheme is operational 7km offshore from Barrow and another hybrid gas and wind scheme has consent 7km off Walney Island. Three more offshore schemes are under consideration around 14.5km offshore, and interest in onshore schemes is set to continue." Under the new structure this becomes paragraph 3.13 Part 1.
204	47, 50, 74	Support the need to consider the cumulative effects on the visual amenity of tourists and effects from sensitive receptors such as national trails and landscape designations.	Comments noted	No action required

ID	Consultee ID	Comments	Response	Action
205	85	Add reference to paragraph 4.22 westward views from Howgill Fells.	It is accepted that a reference to these views would strengthen the guidance.	Add to the end of paragraph 4.22 "This includes the views westwards from the Howgill Fells within the Yorkshire Dales National Park. This area also includes international and national nature conservation interests that should be considered." Under the new structure this becomes paragraph 3.16 Part 1.
206	72	Add 'potential designated area extension to the bullets under paragraph 4.23.	This is not accepted. Natural England has not yet carried out public consultation on the land and it is considered inappropriate to pre-empt any decisions it might make on the land that has been identified as meeting landscape designation criteria. However, in response to other comments additional bullets will be added here to reflect the need to consider cumulative effect on national and international landscape, wildlife and historical interests and the settings of national landscape designations.	Add the following bullets under paragraph 4.23 " <ul style="list-style-type: none"> • effects on international and national designations including landscape, nature and historic environment • settings of international and national designations"
207	88	Not durable for more wind around Greystoke as there are already visual problems with large masts.	Paragraph 4.24 seeks to set out the current issues associated with the Greystoke and Inglewood area and identifies that future development would need to consider its cumulative effects with regard to the existing vertical features. It is not accepted that this section should make a judgement on appropriateness. Further information on this area is included in the landscape capacity assessment for landscape character types 6 and 12 in Part 2.	No action required
208	81	Paragraph 4.24 not happy with reference to the need for an "adequate spatial buffer" in the Greystoke and Inglewood area due to pending planning applications in this area.	The approach is consistent with the reviews for other geographical areas and where planning applications are also pending. The character of the area has been considered against cumulative sensitivity criteria in Table 3 to identify potential cumulative issues. The appraisal is considered reasonably balanced recognising opportunity to correspond to the character and occurrence of other manmade verticals but on the other hand recognising the potential for visual confusion where elements appear to overlap. As explained in SNH guidance (2001) and PAN 45 (paragraph 79) separation from other features will help create a simple image and derives from basic design principles. It is also reflected in design guidance G8. It is accepted that the basis of these reviews and the wording of this paragraph needs to be expanded to improve justification and clarity and also acknowledge the presence of other vertical features. However, it is accepted that additional text should be added to the section for the purpose of clarity.	Expand 4.24 as follows "In the Inglewood area there may be some opportunity to complement repetitive patterns of geometric fields and shelterbelts. Developments might also correspond to character and occasional occurrence of other manmade verticals, such as the Skelton masts and electricity pylons, provided adequate separation ensures they have a simple image and visual conflicts of form and pattern with of these existing verticals are avoided." Under the new structure this becomes paragraph 3.18 Part 1. Add to end of paragraph 4.13 "Criteria for gauging the sensitivity of different landscape types to cumulative development are presented in Table 2. These were developed by considering of the key characteristics sensitive to wind energy development previously established for landscape capacity judgements (Part 2: Table 1 and Appendix 1) and the nature of potential cumulative effects based on experience in Cumbria and issues identified in the Companion Guide to PPS 22 and SNH guidance. They are intended as a tool for site specific assessment and informed the review of cumulative issues experienced in specific parts of Cumbria. The details of this are set out in Part 1." Under the new structure this becomes paragraph 1.32 Part 2.

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ID	Consultee ID	Comments	Response	Action
209	67	Support distance references in paragraph 4.27.	Comment noted	No action required
210	60	Delete distance references in paragraph 4.27	This is not accepted. They act as an essential benchmark for considering schemes both individually and cumulatively and have been accepted by a number of developers currently submitting applications. In terms of cumulative effects, and as stated at 4.29, they assist in envisaging how the effects of multiple schemes might accumulate. They have been carefully considered through analysis of credible existing guidance and research. Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. Paragraph 4.28 highlights that the distance bands assume an open landscape but it is accepted that the caveats and the reference to modifying factors need strengthening and clarifying and the paragraph will be amended accordingly.	Amendment to 4.28 as follows "This assumes an open landscape and should not be used mechanistically, in practice visual interruption by a variety of screening features can limit visibility and likely appearance can be affected by a variety of modifying factors, as discussed in section 3, Part 1 above and Appendix 1, Part 2." Under the new structure this becomes paragraph 1.38 Part 2.
211	81	Distance references in 4.27 are misleading as an extract from part 3, Appendix 1. A disclaimer should be added 'This guidance assumes an open landscape and should not be used mechanistically as a large number of modifying factors can affect likely appear	This is not accepted. They act as an essential benchmark for considering schemes both individually and cumulatively and have been accepted by a number of developers currently submitting applications. In terms of cumulative effects, and as stated at 4.29, they assist in envisaging how the effects of multiple schemes might accumulate. They have been carefully considered through analysis of credible existing guidance and research. Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. Paragraph 4.28 highlights that the distance bands assume an open landscape but it is accepted that the caveats and the reference to modifying factors need strengthening and clarifying and the paragraph will be amended accordingly.	Amendment to 4.28 as follows "This assumes an open landscape and should not be used mechanistically, in practice visual interruption by a variety of screening features can limit visibility and likely appearance can be affected by a variety of modifying factors, as discussed in section 3, Part 1 above and Appendix 1, Part 2." Under the new structure this becomes paragraph 1.38 Part 2.
212	139	The SPD should make it clear that turbines should not be located within 2.4km of a dwelling.	This is not accepted. A range of issues need to be considered to determine the best location of turbines in relation to dwellings. It would be contrary to national guidance to rule out development within 2.4km of dwellings. Careful consideration is needed for local amenity issues, including visual, noise, shadow flicker etc. The landscape characteristics and specific details of a scheme all play an important part in determining the best location for development in relation to dwellings.	No action required
213	103	Paragraph 4.29 - challenge that visibility of the human eye is reached beyond 30km. Jodrell Bank, Heysham Power Station and Blackpool Tower, for example are perceptible over distances up to twice this.	Paragraph 4.49 is not saying that developments would not be visible beyond 30km, however they are likely to appear faint as this is nearing the limit of acuity of the human eye and only then in very good to excellent visibility conditions. Hence effects are likely to be negligible. At 3.4.2 the University of Newcastle study suggests that the outer limit of human visibility in clear conditions for a 5m diameter tower (representative of third generation wind turbines) will be in the order of 50km and the absolute limit of visibility for a 100m structure imposed by the limit of the horizon viewed across a flat plain is similar at approximately 46km. As stated in paragraph 4.31 the 30km cumulative study area is a minimum and the starting point for assessment is a 60km radius allowing for exceptional circumstances. Hence there would be flexibility to address exceptional visibility beyond 30km due say to elevated view points and/or extensive breadth of development, as presented by many offshore schemes.	No action required

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ID	Consultee ID	Comments	Response	Action
214	78	Why is the radius for cumulative effects assessment 30km?	The guidance follows advice of the Companion Guide to PPS22, paragraph 5.24 and guidance from Scottish Natural Heritage (SNH) on Cumulative Effects. In line with the above documents, the SPD highlights that operational, consented and schemes under consideration by the local planning authority, within a 30km radius of a proposal should be included in a detailed assessment of landscape and visual effects. The SNH guidance provides the 30km radius and this is considered appropriate for application in Cumbria. 30km is generally accepted as the limit for potential significant effects but there maybe exceptional circumstances warranting an extension as explained in paragraph 4.31 and the starting point for assessment is a 60km radius base plan. The Companion Guide acknowledges that the SNH guidance has been developed to reflect the considerable experience SNH has in dealing with such issues. It also recognises that this guidance has a wider use than just by SNH.	No action required.
215	74, 83	Support paragraph 4.30 on cumulative assessment.	Comment noted	No action required

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ID	Consultee ID	Comments	Response	Action
216	74,83	Support the need to refer to schemes at the scoping stage and where an anemometer is erected when considering cumulative effects.	Comments noted. However due to comments from other consultees this section will be changed to align it better with other guidance. The reference to anemometer masts will be deleted but a reference to schemes at the scoping stage will remain.	Amend paragraph 4.30 "Cumulative assessment will normally be required where there is another development, proposed, approved or operational, within 30km of a scheme. A proposed development should be taken to mean those that are being dealt with as planning applications, either being formally registered or where an appeal has been lodged. These should include both on and offshore wind energy schemes. When carrying out a cumulative impact assessment, developers should also be aware of other prospective schemes in the area that may be at the scoping stage or development stage as these may also become registered planning applications by the time an application is submitted. In such cases the planning authority may require such schemes to be included in the cumulative impact assessment. The local planning authority would be able to provide advice on this. The 30km minimum radius follows SNH guidance . In some circumstances the Planning Authority may request an extension of the assessment area or inclusion of additional developments in order to address specific issues. For instance where an exceptionally important landscape or visual receptor is located midway between proposals but 18km from each (requiring an extension to 36km) or issues extend beyond a particular locale and where wind energy developments are sequentially seen from key routes across a broader geographical area. As part of the cumulative assessment developers are advised to produce a 60km base plan showing the location of any constructed, consented or proposed schemes. The local planning authority might also request for other relevant prospective development to be mapped . This base plan should be produced at the scoping stage and taken to early meetings with the Planning Authority so that relevant issues can be identified. A full assessment will be required on schemes within 30km of the site, as set out above. " Under the new structure these become paragraphs 1.34 - 1.36 Part 2.

ID	Consultee ID	Comments	Response	Action
217	60, 78, 77, 78, 81, 83	Challenge the need in paragraph 4.30 for schemes not yet formally in the planning system to be included in a cumulative effects assessment and clarify link with G1.	<p>It is accepted that current guidance from both SNH (Cumulative Effects of Windfarms Guidance, April 2005) and PPS22 suggest that a formal assessment should include those schemes that have been submitted as planning applications, been given consent or are operational. However, SNH note that in some cases scheme that have been formally scoped for the EIA, or are in the public domain due to developer publicity and are well articulated in terms of location and scale could be considered material considerations and be requested to form part of a cumulative effects assessment. It also highlights that developers should take account of any schemes that might be in the public realm that could be submitted as a planning application by the time their proposal is submitted. It is accepted that the text setting out the definition of a prospective scheme is misleading and the text should be revised to clarify this point.</p>	<p>Amend paragraph 4.30 "Cumulative assessment will normally be required where there is another development, proposed, approved or operational, within 30km of a scheme. A proposed development should be taken to mean those that are being dealt with as planning applications, either being formally registered or where an appeal has been lodged. These should include both on and offshore wind energy schemes. When carrying out a cumulative impact assessment, developers should also be aware of other prospective schemes in the area that may be at the scoping stage or development stage as these may also become registered planning applications by the time an application is submitted. In such cases the planning authority may require such schemes to be included in the cumulative impact assessment. The local planning authority would be able to provide advice on this. The 30km minimum radius follows SNH guidance . In some circumstances the Planning Authority may request an extension of the assessment area or inclusion of additional developments in order to address specific issues. For instance where an exceptionally important landscape or visual receptor is located midway between proposals but 18km from each (requiring an extension to 36km) or issues extend beyond a particular locale and where wind energy developments are sequentially seen from key routes across a broader geographical area.</p> <p>As part of the cumulative assessment developers are advised to produce a 60km base plan showing the location of any constructed, consented or proposed schemes. The local planning authority might also request for other relevant prospective development to be mapped . This base plan should be produced at the scoping stage and taken to early meetings with the Planning Authority so that relevant issues can be identified. A full assessment will be required on schemes within 30km of the site, as set out above. " Under the new structure these become paragraphs 1.34 - 1.36 Part 2.</p>

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ID	Consultee ID	Comments	Response	Action
218	58, 60	Amend paragraph 4.31 to include a reference to seascapes, ensure LPA act reasonably and to clarify the use of a 60km map.	It is accepted that cumulative assessments should consider on and offshore wind schemes and the text should be revised accordingly. The LPA seek to act reasonably and have provided the guidance in accordance with the Companion Guide to PPS22 and guidance on cumulative effects published by Scottish National Heritage. It is considered appropriate, in some circumstances, for the LPA to request that wind schemes are mapped for a wider area than 30km. This would be identified at the scoping stage and a reasoned justification would be given for this. It is accepted that the text should be revised to reflect this process more clearly.	Revise paragraph 4.30 "...These should include both on and offshore wind energy schemes..." Amend paragraph 4.31 "As part of the cumulative assessment developers are advised to produce a 60km base plan showing the location of any constructed, consented or proposed schemes. The local planning authority might also request for other relevant prospective development to be mapped . This base plan should be produced at the scoping stage and taken to early meetings with the Planning Authority so that relevant issues can be identified. A full assessment will be required on schemes within 30km of the site, as set out above." Under the new structure these become paragraphs 1.34 - 1.36 Part 2.
219	23	Is reference to 60km at 4.29 correct?	Yes, this reference reflects guidance set out by Scottish Natural Heritage on cumulative effects of windfarms. In theory a 60km radius around a site would enable the consideration of a receptor midway between proposal A and proposal B at 30km from each. The guidance seeks for all developments to map operational, consented and submitted schemes within this area, but to carry out a full cumulative effects assessment for those within 30km radius of the site.	No action required
220	23	Guidance could include a 'general pointer scheme' for planners as to whether a cumulative impacts assessment should be carried out (series of yes/no questions)	Paragraphs 4.30 and 4.31 set out where a cumulative impacts assessment will be expected. For the purpose of clarity these will be moved to the start of the section on carrying out cumulative effects assessment. However, they will not be amended to a series of yes/no questions. Under the new structure this section moves to Part 2.	Move paragraphs 4.30 and 4.31 to the start of the section to move section on cumulative landscape and visual effects to Part 2.
221	23	Areas of potential cumulative effect should be mapped.	This is not accepted. The SPD does not seek to set thresholds for development, in accordance with PPS22. The cumulative effects of any scheme can only be determined once the site location and details and its relationship and proximity to other developments are known. The section on cumulative effects highlights key issues and broad locational characteristics to assist with future decision making.	No action required
222	35	G1 should include the requirement to carry out a cumulative assessment for biodiversity	It is accepted that reference should be made to the possible cumulative effects of broader planning issues.	Add a new G1 to the revised structure in part 1 "The cumulative effects should be assessed for all relevant planning issues set out in section 2: • Within an area already containing one or more operational or approved developments • As an extension to an operational or approved development • At the same time as one or more other developments are being proposed through a planning application within an area."

ID	Consultee ID	Comments	Response	Action
223	58	Local Planning Authority should take account of prospective schemes when considering cumulative effects, not developers.	It is accepted that paragraph 4.30 could be amended for clarity. In practice, the Local Planning Authorities would review the assessment provided by the developer to determine if any prospective schemes need to be considered. However, the information needs to be provided by the developer in order the LPA to consider it. The LPA would identify the schemes it required assessing, and if it was deemed appropriate, the developer might be asked to carry out further work if necessary by the Local Planning Authority. A sentence should be added to reflect this.	Amend paragraph 4.30 "Cumulative assessment will normally be required where there is another development, proposed, approved or operational, within 30km of a scheme. A proposed development should be taken to mean those that are being dealt with as planning applications, either being formally registered or where an appeal has been lodged. These should include both on and offshore wind energy schemes. When carrying out a cumulative impact assessment, developers should also be aware of other prospective schemes in the area that may be at the scoping stage or development stage as these may also become registered planning applications by the time an application is submitted. In such cases the planning authority may require such schemes to be included in the cumulative impact assessment. The local planning authority would be able to provide advice on this." Under the new structure this becomes paragraph 1.34 Part 2.
224	60	Paragraph 4.32 should not refer to the predevelopment landscape when dealing with extensions etc.	It is accepted that the guidance should be closer to the conclusion in Box 7.1 item 3 of the GLVIA.	Revise paragraph 4.32 "In the case of enlargements, extensions and siting new wind energy development adjacent to an existing development changes in scale need to be taken into account. The potential for the receiving landscape to accommodate the larger composite feature ¹⁶ and any extended visual influence need to be considered. It will usually be necessary to provide a cumulative ZVI comparing the existing scheme and the extension or adjacent scheme. G2: Where proposals are extensions or adjacent, the assessment of cumulative effects should include a consideration of both developments as a larger composite feature. "

ID	Consultee ID	Comments	Response	Action
225	58	Who will be deemed competent to make cumulative effects judgements in paragraph 4.33 and G3?	An informed decision is usually taken by the landscape expert working on the development team. A sentence should be added to clarify this position. However, it will be the role of the Local Planning Authority to make the final judgment having reviewed the judgements made as part of an application against the relevant policy framework. Where necessary, the local planning authority may employ expert landscape advice to determine whether or not the judgement put forward by the applicant is well founded and assist with the final decision. The text should be revised to clarify this position.	<p>"Amend paragraph 4.33 for Part 1 "This guidance does not seek to set thresholds that determine when cumulative impacts are unacceptable. The local planning authority will need to make a judgement for each individual scheme following careful consideration of the information provided by a developer. When judging acceptability of a new proposal it is crucial to determine the "threshold" beyond which wind energy developments in a particular area become unacceptable. In other words, although the effect of a single scheme is limited, when added to the effect of other schemes in the area, operational, approved or proposed, it creates unacceptable cumulative impacts . This information should be included as part of the Environment Impact Assessment, where relevant, or be set out in a planning statement." Under the new structure this becomes paragraph 3.21 Part 1.</p> <p>Amend paragraph 4.33 for Part 2 "As set out above this guidance does not seek to set thresholds that determine when cumulative impacts are unacceptable. A judgement needs to be made for each individual scheme. It is usual for a landscape specialist to be employed by an applicant to identify the significance of effects and judge the acceptability of a scheme in relation to this. It is then up to the local planning authority to make a judgement on the effects against the policy framework." Under the new structure this becomes paragraph 1.41 in Part 2</p>

ID	Consultee ID	Comments	Response	Action
226	60	Paragraph 4.33 should refer to the significance of effects and be made clearer.	This is not accepted. G3 goes on to encompass significance of effects through the requirement to consider the magnitude and landscape value. This combined with a requirement to consider landscape change and planning objectives will determine a judgement on acceptability. This broad guidance, which is intended for a wide audience, is developed in Part 3 into specific guidance on assessment of effects under EIA regulations. It is accepted that document navigation and relationship between the parts needs to be strengthened. Under the new structure Part 2 will include detailed information on landscape and visual effects comprising the landscape capacity assessment, details such as this on cumulative effects, siting and design and the specific guidance formally contained in part 3.	Revise the structure to move details on landscape and visual effects from chapter 4 and 5, part 1, to an improved Part 2. Part 2 will focus on landscape and visual effects only and include the above, the landscape capacity assessment and be merged with the details contained in Part 3. General information on siting and design and cumulative effects that could apply to other issues associated with wind development will remain in Part 1. Amend paragraph 4.33 in new Part 2 "As set out in Part 1 reasons are likely to arise where multiple schemes may have to be accepted as a defining characteristic in some of Cumbria's landscapes. However a consistent and coherent approach to the siting, design, spacing and scale of schemes in relation to the receiving landscape type will be required to ensure that they make a positive contribution to the overall image. A succession of schemes with different designs and relationships to the landscape can appear confusing as well as raise questions about the visual rationale and suitability of each development. In order to demonstrate clearly where such circumstances might arise the cumulative landscape and visual assessment should refer to the criteria set out in Table 3 above when considering landscape value and change considerations. Such information is necessary if the local planning authority is to judge whether or not a scheme is acceptable." Under the new structure this becomes paragraph 1.42, Part 2.
227	63	Support the principle of assessing thresholds of when cumulative effects become unacceptable for every proposal – paragraph 4.33.	Comment noted	No action required

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ID	Consultee ID	Comments	Response	Action
228	79	Delete 1st two sentences of paragraph 4.34 – they weaken the SPD.	It is not accepted that the sentences should be removed because they weaken the SPD. PPS22 and local policy state that development could go ahead where significant harm is identified due to overriding social, economic and environmental benefits. The text should be revised to reflect better the need to meet targets to reduce climate change, and to flag up some sensitivities that might need careful consideration.	Revise paragraph 4.34 "In order to meet government targets for renewable energy and help reduce negative climate change impacts multiple schemes may need to be accepted as a defining characteristic in some of Cumbria's landscapes. However, landscape and visual effects, effects on certain bird populations, such as Hen Harriers, and other planning issues might limit the amount of wind energy development that can take place in some parts of Cumbria, unless overriding social, economic or environmental benefits are demonstrated." Under the new structure this becomes paragraph 3.22 Part 1.
229	67	Qualify the reference to 'multiple schemes may have to be accepted as a defining characteristic in some of Cumbria's landscapes' in paragraph 4.34	Climate change is an accepted phenomenon and the UK government is committed to tackling this through a range of ways. One way is through the production of clean and renewable energy. Therefore, it may be necessary to accept wind development as a defining feature to reflect PPS22 and local planning policy. These state that development could go ahead where significant harm is identified due to overriding social, economic and environmental benefits. Overriding environmental benefits could be the contribution a scheme has to reducing climate change. The text should be revised to reflect better the need to meet targets to reduce climate change, some sensitivities that might need careful consideration, and to acknowledge that overriding benefits might outweigh adverse effects.	Revise paragraph 4.34 "In order to meet government targets for renewable energy and help reduce negative climate change impacts multiple schemes may need to be accepted as a defining characteristic in some of Cumbria's landscapes. However, landscape and visual effects, effects on certain bird populations, such as Hen Harriers, and other planning issues might limit the amount of wind energy development that can take place in some parts of Cumbria, unless overriding social, economic or environmental benefits are demonstrated." Under the new structure this becomes paragraph 3.22 Part 1.

ID	Consultee ID	Comments	Response	Action
230	83	The guidance should clarify how paragraph 4.34 and the acknowledgement that 'multiple schemes may have to be accepted as a defining characteristic in some of Cumbria's landscapes' fits with the landscape capacity approach of the guidance.	It is accepted that text should be added to paragraph 4.34 to clarify the position with this. It is expected that developers will consider whether or not the cumulative effects result in a new defining characteristic and the local planning authority will judge whether or not the effect of this is overridden by the need to provide renewable energy in the County. It would be contrary to PPS22 for the guidance to identify broad areas where wind turbines might be acceptable defining features. Under the revised structure reference to landscape and visual effects in the second part of this paragraph will move to the cumulative effects of landscape and visual effects section in Part 2. The first part of the paragraph will remain in part 1 and be amended to cover other planning issues too.	Amend paragraph 4.34. "In order to meet government targets for renewable energy and help reduce negative climate change impacts multiple schemes may need to be accepted as a defining characteristic in some of Cumbria's landscapes. However, landscape and visual effects, effects on certain bird populations, such as Hen Harriers, and other planning issues might limit the amount of wind energy development that can take place in some parts of Cumbria. However, landscape and visual effects, effects on certain bird populations, such as Hen Harriers, and other planning issues might limit the amount of wind energy development that can take place in some parts of Cumbria, unless overriding social, economic or environmental benefits are demonstrated." Add the following to Part 2 "As set out in Part 1 reasons are likely to arise where multiple schemes may have to be accepted as a defining characteristic in some of Cumbria's landscapes. However a consistent and coherent approach to the siting, design, spacing and scale of schemes in relation to the receiving landscape type will be required to ensure that they make a positive contribution to the overall image. A succession of schemes with different designs and relationships to the landscape can appear confusing as well as raise questions about the visual rationale and suitability of each development. In order to demonstrate clearly where such circumstances might arise the cumulative landscape and visual assessment should refer to the criteria set out in Table ** above when considering landscape value and change considerations. Such information is necessary if the local planning authority is to judge whether or not a scheme is acceptable.
231	61	G3 should include thresholds for birds.	It is accepted that this section should reflect more issues than landscape and visual issues and will be revised accordingly in Part 1.	Amend G3 "The limiting threshold for cumulative effects and wind energy developments should be based on a well-considered judgement informed by analysis of: Degree or magnitude of change to an area, feature or species Nature of the potential change reflecting the inherent sensitivity of the effected area, feature or species.

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ID	Consultee ID	Comments	Response	Action
232	60	Reword G3 to refer to cumulative effects.	This is accepted for the purpose of clarity.	Amend beginning of G3 "The limiting threshold for cumulative effects wind energy developments should be based on a well-considered judgement informed by analysis of:"
233	60, 81	Criteria in table 3 not coherent and contradictory	This mirrors comments on Part 2: Table 1. The reason for the apparent contradictions is that the physical elements or features can be relevant to more than one sensitivity. Landscape and visual impact assessments for specific schemes involve identifying a range of potential issues or effects (that might on face value appear contradictory) and weighing these against one another. Expert professional input is essential as acknowledged throughout this guidance. Appropriately experienced landscape architects are best placed to understand the subtleties and complexities entailed in the potential cumulative effects arising from multiple wind energy developments and reflected in the sensitivity criteria in Table 3. However an explanation of the basis and purpose of this table is required to assist understanding by a wider audience. The criteria will be reordered to distinguish between landscape character and visual criteria.	Add the following below Table 3 Part " The criteria in this table were developed by considering of the key characteristics sensitive to wind energy development previously established for landscape capacity judgements (Part 2: Table 1 and Appendix 1) and the nature of potential cumulative effects based on experience in Cumbria and issues identified in the Companion Guide to PPS 22 and SNH guidance.
234	103	Support cumulative sensitivity criteria in Table 3	Comments noted	No action required
235	60	Move Table 3 to Part 2	This is accepted and will be moved as part of the new structure of the SPD. Under the new structure Part 2 will include detailed information on landscape and visual effects comprising the landscape capacity assessment, details such as this on cumulative effects, siting and design and the specific guidance formally contained in part 3.	Revise the structure to move details on landscape and visual effects from chapter 4 and 5, part 1, to an improved Part 2. Part 2 will focus on landscape and visual effects only and include the above, the landscape capacity assessment and be merged with the details contained in Part 3. General information on siting and design and cumulative effects that could apply to other issues associated with wind development will remain in Part 1.
236	72 Discuss	Add illustrations to design chapter	It is accepted that illustrations may help to aid understanding of certain sections of the SPD, and in particular guidance on landscape issues for siting and design. Cross references to documents with illustrations have been provided and further consideration will be given to the provision of illustrations in the final publication..	The final publication will consider the best way to illustrate points put forward in the document.
237	28, 63, 74, 129	Support design and siting section	Comment noted	No action required

ID	Consultee ID	Comments	Response	Action
238	77	Challenge SNH policy use – it is out of date, not peer reviewed and applies to Scotland not England.	This is not accepted. The SNH guidance referred to in this section is 'Guidelines on the Environmental Impacts of Windfarms and Small Scale Hydroelectric Schemes' published in 2001 which appears to be based on experience of turbines up to a blade tip height of 90m ie second generation machines. Whilst acknowledging the pace of technology change and that details (such as turbine size) become out of date the introduction notes that "the general principles, however, should have longer application...". The principles on siting and design in this SNH document are essentially generic, based on basic design principles which are summarised in an Appendix 3. The Companion Guide to PPS22 recognises that wind farms have been concentrated in Scotland and Wales and the considerable experience of SNH. It refers to the several volumes of good practice guidance for their own and wider use thereby affirming its credibility of SNH guidance. Notwithstanding this Section 5 is also based on considerable experience of recent third generation developments in Cumbria some of which is noted in Section 1. Hence changes in the turbine size, proportions and separation distances and infrastructure requirements have been taken account of.	No action required
239	66, 77, 78	Section 5 reiterates already stated concerns on visual impacts, is overly complex, prescriptive and unnecessary.	This is not accepted. Section 5 seeks to provide guidance to assist developing schemes that are sited and designed to reduce any harmful landscape and visual effects. However, due to other comments received the specific details relating to landscape and visual effects will be moved to Part 2 of the guide. This will contain detailed information on landscape and visual effects and complement Part 1 that provides general guidance on all other planning related issues.	No action required.

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240	35, 44, 61, 77, 78	The design and siting section and G4 should refer to all key factors used in site selection such as electricity generating potential and wind speeds, biodiversity and other issues. It shouldn't only focus on landscape issues.	<p>It is accepted that text on site selection and design should apply to all relevant planning issues, and not just landscape and visual effects. The original section 5 focussed on landscape and visual effects only. This specific advice has been moved to Part 2 which will include all the information relevant to landscape and visual issues as part of the restructure of the SPD. A more fuller set of planning considerations is now included in Part 1. This also reflects other technical and economic issue such as wind speed and electricity potential as they are recognised as being important site selection criteria for developers. However, these are identified as not being relevant planning considerations and, as such, would not be taken into account by the LPA when determining a planning application.</p>	<p>Add new introductory text to the section on Siting and Good Design and the following text on site selection and initial sizing in Part 1 "When appraising a potential site's suitability and to help determine the most appropriate size and number of turbines it could accommodate the following issues will be considered by a developer at the outset:</p> <ul style="list-style-type: none"> a. Can the site fit sufficient wind turbines to optimise energy production? b. Is the site windy enough? c. Is there grid infrastructure near the site? d. Will large delivery vehicles be able to gain access to the site? e. Is there enough distance between a site and dwellings, rights of way, roads? f. Are aircraft, radar and telecommunications issues likely? g. Are there archaeological designations/sensitivities associated with the site? h. Are there ecological designations/sensitivities associated with the site? i. Are there landscape designations/sensitivities associated with the site and what is the landscape capacity? <p>G14 Developers should confirm the acceptability of a specific site and the appropriate size and number of turbines through a preliminary analysis of technical, environmental and local amenity issues. Move paragraph 5.7 to the section dealing with site selection and initial sizing in Part 2.</p>
241	60	Clarify reference to paragraphs 4.16 - 4.23 in paragraph 5.5.	This was a typing error that was not corrected before publication. It will be revised in the new structure and form part of Part 2.	Amend cross referencing in line with new structure.
242	114	Move paragraph 5.2 to front of section, reference landscape capacity assessment info. in paragraph 5.3.	Section 5 will be split to provide general advice on siting and design on non landscape/visual issues in Part 1. More specific advice on siting and design in relation to landscape and visual issues will be moved to Part 2. Paragraph 5.2 will be moved to the start of the section in Part 1, and paragraph 5.3 will move to Part 2. This should overcome the concerns raised here.	Revise section 5 to focus on non landscape/visual issues in part 1 and move landscape and visual references to Part 2.

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ID	Consultee ID	Comments	Response	Action
243	103	Support paragraph 5.2	Comments noted. Due to other comments raised seeking this section to consider issues other than landscape and visual ones, this paragraph will be revised.	Amend paragraph 5.2 "1.1 The process of site selection, design and mitigation should be an iterative process informed by and responding to an ongoing environmental assessment. The full range of planning issues set out in section 2 should be considered by a developer, alongside economic and technical requirements from the outset of a project and throughout each stage of its development. However, economic and technical issues associated with wind energy development, such as the wind resource in the area and the cost of developing a project, are not material planning considerations and would not be taken into account when making a decision." Under the new structure this becomes paragraph 4.2 Part 1.
244	60	Paragraph 5.3 should refer to both landscape character and visual issues.	This is accepted and the text should be revised accordingly. As part of the restructure of the SPD this text will be deleted from this section in Part 1 and will be moved to Part 2. Part 2 will provide all the specific advice on the landscape and visual effects and the landscape capacity assessment.	Move paragraph 5.3 to Part 2 and amend "At the project feasibility stage, when considering site selection and the initial number and size of turbines appropriate, the full range of technical and environment considerations listed in section 4, Part 1 should be considered. When considering the landscape and visual issues, the following approach should be taken: a identify the landscape capacity as set out in the assessment sheets in Section 2. b carry out assessments for each landscape character type, c carry out a preliminary survey, d analysis of the landscape character sensitivity and values, e carry out a visual effects assessment and, f carry out a cumulative effects assessment." Under the new structure this becomes paragraph 1.47 Part 2..
245	60	Paragraphs 5.3 - 5.5 should clarify the meaning of sizing.	This is accepted and the text should be revised accordingly.	Move paragraph 5.3 to Part 2 and amend "At the project feasibility stage, when considering site selection and the initial number and size of turbines appropriate, the full range of technical and environment considerations listed in section 4, Part 1 should be considered..." Under the new structure this becomes paragraph 1.47 Part 2.

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ID	Consultee ID	Comments	Response	Action
246	77, 78	G4 should not refer to Table 2, Part 1 as it is a stranglehold on development.	This is not accepted. Table 2 in Part 2 refers to the value criteria that was applied to the landscape capacity assessment. The consultees are more likely referring to Table 2 in Part 1. This summarises the findings of the landscape capacity assessment. A detailed review has been carried on the landscape capacity assessment to take into account the comments received as part of the consultation. This has concluded that the landscape capacity assessment was generally robust, although it has identified areas that could change. These changes are set out in full later on in this schedule. Both of the consultees that submitted this comment raised detailed comments on the landscape capacity assessment which have been dealt with later on too.	No action required
247	72, 103	Support G5	Comments noted	No action required
248	77	Paragraph 5.6 does not provide clear guidance and G5 is prescriptive and arbitrary.	It is not accepted that this is arbitrary or prescriptive. This guidance is based on specific development control experience in Cumbria. It is particularly pertinent given the variety, tight sequences and/or interwoven nature of landscape types and sub-types in the county. The guidance also refers to the SNH guidance where further explanation and illustration can be found. However it is accepted that an example might improve clarity.	Add to end of paragraph 5.2 "Links between assessment and the different stages of the siting and design process are identified in Figure 1 therein. More guidance on landscape and visual assessment is set out in section 3." Amend paragraph 5.6 to read "Cumbria enjoys a wide variety of scenery often occurring in tight sequences or in interwoven patterns. Locations within a tight sequence of contrasting landscape types or sub-types may make it difficult to design a development that appears logical and clearly related to a consistent set of key characteristics. For example a location on a narrow coastal plain which backed onto low hilly farmland of glacial origin. Here the large scale open character and simple rectilinear field patterns of the coastal plain would tend to assist integration and suggest a geometric layout of turbines. However in relation to the low hilly farmland they would be likely to appear over dominant and incongruous against an irregular and small scale pattern of small undulations, farm houses, frequent trees, scrubby hollows, tarns and winding roads. This issue is recognised by Scottish Natural..." Under the new structure these become paragraphs 1.46 and 1.51 Part 2 respectively.

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ID	Consultee ID	Comments	Response	Action
249	72	G5 could be difficult to implement. Additional text should be added to recognise that a number of proposals are likely to impact upon more than one character type and as such, all affected types should be taken into account in the assessment.	This section is about siting and design, it is already recognised elsewhere in the document that the assessment needs to consider effects on the variety of types in the study area and their inter-relationships (Part 1: 3.19, Part 2: Connections with Adjacent Landscapes sensitivity criteria and Part 3 p 8 & 11). However the iterative relationship between assessment and design is important. Part 3: Fig 1 already considers and it is accepted that this could be highlighted more strongly in the context of 5.2. The reference bracketed above will all move to Part 2 under the revised structure.	Add to end of paragraph 5.2 "More guidance on landscape and visual assessment is set out later in section 3. Links between assessment and the different stages of the siting and design process are identified in Figure 1 therein." Amend paragraph 5.6 to read "Cumbria enjoys a wide variety of scenery often occurring in tight sequences or in interwoven patterns. Locations within a tight sequence of contrasting landscape types or sub-types may make it difficult to design a development that appears logical and clearly related to a consistent set of key characteristics. For example a location on a narrow coastal plain which backed onto low hilly farmland of glacial origin. Here the large scale open character and simple rectilinear field patterns of the coastal plain would tend to assist integration and suggest a geometric layout of turbines. However in relation to the low hilly farmland they would be likely to appear over dominant and incongruous against an irregular and small scale pattern of small undulations, farm houses, frequent trees, scrubby hollows, tarns and winding roads. This issue is recognised by Scottish Natural..." Under the new structure these become paragraphs 1.46 and 1.51 Part 2 respectively.
250	103	Support G6	Comments noted	No action required
251	60, 77, 78, 83	Guidance in 5.7 should reflect other technical considerations that need to be accommodated when designing the overall composition of a site.	This is accepted and is reflected in amended text to Part 1, section 3. this provides general advice on site selection and sizing and includes reference to technical issues. A cross reference should be added to paragraph 5.7 which will be moved to Part 2 to ensure it reflects the above text in Part 1. As part of the restructure of the SPD Part 2 will contain specific advice on landscape and visual issues.	Amend paragraph 5.7 "After a site has been chosen and the issues set out in Part 1, section 4 considered, it is essential that landscape and visual considerations are primary in conceiving the overall form and composition of the development (much like designing and placing a piece of sculpture)." Under the new structure this becomes paragraph 1.53 Part 2.
252	78	Paragraph 5.8 should not refer to noise as it would not influence site layout.	This is not accepted as a noise assessment in accordance with guidance in PPS22 should be used to determine the best location for turbines in relation to sensitive development, such as housing. This will then influence the overall siting and design of a scheme. This reference should remain.	No action required.

ID	Consultee ID	Comments	Response	Action
253	84, 103	Paragraph 5.9-10 and G7 should refer to re powering of existing sites.	It is accepted that the guidance would be strengthened by adding a reference to re powering existing sites.	Add paragraph 5.9 to include "...Due to the increased height of turbines, the consequent increase in separation distance between turbines and the trend towards extensions of developments next to existing ones and the re powering of existing schemes with larger turbines, careful consideration is needed to ensure that the resulting scale and spread of development is contained and 'controlled' within the landscape..." Under the new structure this becomes paragraph 1.55 Part 2.
254	137	Replacement of existing turbines to upgrade sites should not be done without full planning consideration	Under planning regulations the replacement of existing turbines with larger ones, or extensions to existing schemes would require a planning application and full consideration of the relevant issues. However, for the purpose of clarity text will be added to the section setting out the scope of the guidance in Part 1.	Amend paragraphs 1.3 and 1.9 "This Guidance replaces previous supplementary planning guidance for wind energy development issued in 1997. It applies to schemes of less than 50MW, which are normally determined by local planning authorities, of one or more turbines provide energy either directly to an individual or a group of buildings or for the sole purpose of producing electricity to support the national energy network. It applies to new schemes and extensions to, and re-powering of, existing schemes." Under the new structure this becomes paragraph 1.19.

ID	Consultee ID	Comments	Response	Action
255	60	Paragraph 5.9 should make a distinction between the scale of a development and the proportion of turbines and development size and turbine size.	This is accepted for the purpose of clarity.	Amend paragraph 5.9 as follows "The increased size of third generation wind turbines raises major issues in terms of the scale and proportion of developments in relation to settlements and other landscape elements. To help reduce carbon emissions and generate more electricity from renewable sources the size of developments is increasingly driven by available technology and maximising output. In some circumstances this has resulted in schemes that seek to fill a site with turbines without due regard to landscape fit. This can result in schemes overwhelming the scale of existing landscape elements. Due to the increased height of turbines, the consequent increase in separation distance between turbines and the trend towards extensions of developments next to existing ones and the re powering of existing schemes with larger turbines, careful consideration is needed to ensure that the resulting scale and spread of development appears contained and 'controlled' within the landscape. The scale of turbines can be indiscernible..." Under the new structure this becomes paragraph 1.55 Part 2.

ID	Consultee ID	Comments	Response	Action
256	77	Paragraph 5.9 should not refer to 'sprawl'.	It is considered appropriate to refer to scale and proportion, but is accepted that the wording could be perceived as being negative. It is accepted that the text should be amended to be more positive.	Amend paragraph 5.9 as follows "The increased size of third generation wind turbines raises major issues in terms of the scale and proportion of developments in relation to settlements and other landscape elements. To help reduce carbon emissions and generate more electricity from renewable sources the size of developments is increasingly driven by available technology and maximising output. In some circumstances this has resulted in schemes that seek to fill a site with turbines without due regard to landscape fit. This can result in schemes overwhelming the scale of existing landscape elements. Due to the increased height of turbines, the consequent increase in separation distance between turbines and the trend towards extensions of developments next to existing ones and the re powering of existing schemes with larger turbines, careful consideration is needed to ensure that the resulting scale and spread of development appears contained and 'controlled' within the landscape. The scale of turbines can be indiscernible..." Under the new structure this becomes paragraph 1.55 Part 2.
257	20	Support paragraph 5.10	Comment noted	No action required
258	78	Paragraph 5.10 and G7 should recognise that developers priority is to optimise energy generation on the site.	This is accepted and is reflected in amended text to Part 1, section 3. This provides general advice on site selection and sizing and includes reference to technical issues. However it is considered acceptable to retain a reference to landscape compatibility and scheme size in paragraph 5.10 as development in some sites might only be acceptable using small turbines that reflect the scale of the landscape.	Amend paragraph 5.10 "Instances may arise where landscape characteristics and elements may only support a small number of turbines or turbines of a certain height without adverse effects. Such issues should be consider at the initial site selection phase. For more guidance on this see section 4, Part 1." Under the new structure this becomes paragraph 1.56 Part 2.
259	60	In G7 delete subservient text and end with woodland or settlements.	It is accepted to delete this section in order to remove subjective language. This will be replaced with more neutral language.	Replace "and appear subservient to these elements..." with "and achieve a sense of containment."
260	60	Paragraph 5.12 and G9 unclear	This is not accepted. Concepts of stability and balance founded in basic design principles and a project landscape architect would be best placed to interpret these. However an example and cross reference to SNH guidance where further explanation and illustration can be found would be beneficial.	Add to paragraph 5.12 "...compensating for each other. For instance if placed on upon a hill it should not seem top heavy or precarious, further explanation and illustration can be found in the SNH guidance". Under the new structure this becomes paragraph 1.58 Part 2.
261	20	Support paragraph 5.15	Comment noted	No action required

ID	Consultee ID	Comments	Response	Action
262	32, 60, 77	<p>Paragraph 5.16 -5.20 and G12 should be renamed and rewritten to reflect discussion on magnitude of change.</p> <p>Paragraph 5.17 reference to angles is unclear. Paragraph 5.19 is overly prescriptive.</p>	<p>These comments are partially accepted. The wording should adopt a more balanced approach and the clarity of discussion should be improved. However to get the points across it is considered necessary to use terms such as dominance and intrusion particularly as development control experience shows these can be significant adverse effects and the SPD seeks to avoid them. These terms are widely understood and used as descriptors of visual effects eg SNH guidance and GLVIA 7.49. The formula on dominance involving angles is a legacy from previous guidance and evidence to substantiate it is lacking. On other points references that substantiate points have been lost in the editing process. This section is not just about magnitude of change as suggested but its nature and significance. This section is primarily about composition including siting of turbines within the overall development site, there are of course overlaps with siting generally and this is brought out by cross referencing in 5.5, although this requires correction.</p>	<p>Correct cross referencing in 5.5 from "More information is provided in paragraphs 4.16-23" to "further explanation is provided 5.16 – 5.20" below" amend this wording for these paragraphs as follows: "Composition: Visual Amenity 5.16 Both the general development siting (see 5.5 above) and design should have regard to avoiding over dominance and visual intrusion. Dominance relates to the magnitude of change and intrusion concerns the nature of the effect involving two considerations: firstly how it appears as a basic visual element in terms of compatibility with landscape character and in terms of the aesthetic qualities of the development composition such as stability, balance and cohesion as discussed above; and secondly how it is viewed in relation to other landscape elements in the composition of a view. Computer modelling of alternative designs and analysis from key viewpoints as part of the design process is likely to assist in achieving the optimum solution. 5.17 The main physical parameter determining the apparent size is the proportion of the view occupied by the development which depends on the overall size of a scheme, distance from the viewpoint and breadth of existing view. Further information on the likely appearance in relation to distance can be found in Part 3: Appendix 1.5.18 The arrangement and orientation of turbines may be manipulated relative to key views as part of the design process to lessen the apparent size. Due to the UK's prevailing south westerly winds viewpoints in the south to west and north to east quadrants are most likely to see the blades in full plane and therefore greatest exposure to blade movement. (footnote ref Univ Newcastle as below). Sites with key views in these quadrants could be problematic but it may be possible to mitigate effects for example by narrowing the development profile relative to these views. 5.19 A large number factors in the composition of views can modify the apparent size and sometimes also the nature of visual effects. These include background contrast, proportional visibility over intermediate horizons, elevation, and framing. Many are documented in research carried out by the University of Newcastle (Footnote:</p>

ID	Consultee ID	Comments	Response	Action
				Visual Assessment of Wind Farms – Best Practice, University of Newcastle for SNH, 2002). 5.20 Turbine height and bulk will have most influence on the degree of dominance within close range views. The perceived sense of dominance will be influenced by skylining or by positioning turbines on a hilltop above the viewer which can make them feel more overbearing, as well as by the movement inherent in wind turbines. 5.21 The appearance of blades or the nacelle and blades above the horizon in close to mid range views tends to be eye catching and also disconcerting. Adjustment of turbine heights, positions and orientation may lessen such effects. 5.22 Turbines framed by other features such as buildings or trees close to the viewer can have a greater apparent size. This phenomenon is also known as 'netting' that is bringing the distant scene forward by drawing our attention to it (footnote ref: 'The Concise Townscape' Gordon Cullen 1983). On the other hand elements such as ridges or woodland within the development setting may offer screening potential from some aspects." Under the new structure these move to Part 2 and become paragraphs 1.67-1.69 respectively. G13 wording to remain as existing.
263	67	A reference to tranquillity should be included in paragraphs 5.16 - 5.20	it is not accepted that this section on the design of proposals and the dominance and visual intrusion issues relating to them should include a reference to tranquillity. Tranquillity and remoteness form part of the sensitivity analysis of the landscape capacity assessment and relate to landscape characteristics rather than the design of a scheme.	No action required
264	20, 32	Delete the subjective reference to unattractive designs in paragraph 5.21, this is subjective.	It is accepted that this could be perceived to be subjective and the reference will be deleted.	Delete "and some of latest designs are not unattractive as individual design elements" from the first sentence of paragraph 5.21.
265	77	Unrealistic to expect trees to screen development as they create turbulence.	The guidance is not suggesting that trees be used to screen the development at a local level, but that features such as woodlands seen in association with a development site could offer screening potential from certain areas.	No action required
266	78	G12 aims to prevent development	This is not accepted. This section seeks to provide guidance to developers to help design a development that will not cause significant landscape and visual effects.	No action required.

ID	Consultee ID	Comments	Response	Action
267	141	Why do turbines have to be white?	Turbines don't have to be painted white. Guidance is provided in paragraphs 5.23 - 5.25 on the most appropriate colours for wind turbines. It acknowledges that the circumstances around a site will help determine the most appropriate colour for each individual scheme. It is likely that this will come from a palette of colours from white to dark grey.	No action required
268	122	Use colour to camouflage wind turbines.	Guidance is provided in paragraphs 5.23 - 5.25 on the most appropriate colours for wind turbines. It acknowledges that the circumstances around a site will help determine the most appropriate colour for each individual scheme. It is likely that this will come from a palette of colours from white to dark grey.	No action required
269	83	G13 and G15 contain factors that can help reduce impacts on visual amenity, however they are better dealt with through the EIA and application process.	It is not accepted that these design details should be dealt with through the EIA and application process. However these comments highlight confusion regarding the relationship between design process and assessment of effects in Section 5. It is accepted that this needs to be clarified and the importance and intention of siting and design needs to be given greater emphasis in the introduction as it applies all the guidance in Section 5 not just G13 and G15. Reference to a squat appearance relates to the basic design principle of proportion, but it is accepted that G13 could be more positively worded. It is accepted that the final sentence in G15 should become standard text in paragraph 5.27 instead of being contained in the key guidance.	Amend paragraph 5.1 "As with any other form of development siting and design will be material planning consideration for wind energy development. The principle is underlined in PPS22 . This section examines the issues arising from the unique visual characteristics of wind energy development and provides generic guidance based on experience and basic design principles. It is considered important to focus on the landscape and... they will create distinctive features in the landscape. Their siting and design is therefore of primary importance and could avoid unnecessary adverse visual effects improve compatibility with landscape and help to create a positive image through attention to aesthetic qualities of development and turbines as entities in themselves. Amend 5.2 "The process of site selection and design is viewed as a primary mitigation measure and should be an iterative process informed by...throughout all stages of its development. More guidance on landscape and visual assessment is set out later in section 3. Links between assessment and the different stages of the siting and design process are identified in Figure 1 therein." Under the new structure these become paragraphs 1.44 and 1.46 Part 2 respectively. Amend G13 delete "so as to avoid a squat appearance" and substitute "with the aim of achieving elegant proportions. Under the new structure this becomes LG13. Move the final sentence of G15 to the end of paragraph 5.27 (LG 15 and paragraph 1.76 Part 2).
270	77	G15 shouldn't prescribe speed of rotors as it is beyond the control of developers.	G15 does not seek to prescribe the speed of blade but sets out a key consideration that should be taken into account when designing a scheme.	No action required

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ID	Consultee ID	Comments	Response	Action
271	30	Support G16 and G17	Comments noted. It should be noted that due to other comments raised during the consultation process G16 will be deleted as it partly duplicates the more detailed good practice principles set out in G18 and is covered in introductory text set out in paragraph 5.2.	No action required
272	72	Clarify whether infrastructure in G16 refers to roads?	It is accepted that clarification could be provided in 5.28 to set out what is meant by associated infrastructure and ancillary development.	Amend paragraph 5.28 "Infrastructure and ancillary development, including road access, foundations, transformers and substation buildings, fencing and electrical connections could effect a range of environmental issues." Under the new structure this becomes paragraph 1.77 Part 2.
273	83	G17 should acknowledge that issues may arise during the planning process after submission and the SPD should accept that this might be the case.	It is accepted that for any application issues may arise following the submission of a planning application, usually in response to consultations that are carried out. It is accepted that text should be added to acknowledge this.	Add text to paragraph 5.29 "If further issues arise during the planning process, for example in response to advice from the Highways Authority, landscape issues should still be taken into account as details are refined." Under the new structure this becomes paragraph 1.78 Part 2.
274	23	G17 should acknowledge the role of the Highway Authority.	The role of the Highway Authority and relevant considerations will be set out in Part 1. This was an omission in the consultation draft SPD. It is accepted that further clarification is added preceding G17 in paragraph 5.29. This will be moved to Part 2 that will deal with landscape and visual aspects only.	Add "If further issues arise during the planning process, for example in response to advice from the Highways Authority, landscape issues should still be taken into account as details are refined." to the end of paragraph 5.29. This becomes paragraph ** in Part 2 under the revised structure. Add a new section on Highways to Part 1.

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275	32, 69, 128	Due to the abnormal loads associated with wind development the whole route and access should be assessed for suitability with regard to highways and landscape effects.	This is accepted highway text will be added to section 2 in Part 1. This will ensure that all the planning related issues currently covered by Joint Structure Plan policy R44 and R45 are considered in this part of the guide.	A new section will be added to Part 1 on Highways issues. This will follow the text on cultural heritage in section 2. "The highways considerations associated with wind energy development are largely similar to those considered for other development. However, as stated in the design section later on in the guide, access to a site is an important consideration to ensure that the local network of roads can accommodate the large vehicles needed to transport the turbine components. Any scheme will need to satisfy the Highway Authority that it is acceptable. An assessment of the full route to be used, including the site access, needs to be carried out in order to ensure that the road network can accommodate the loads and, where necessary, identify any measures that might be required. When considering such measures from a highway point of view consideration should also be given to any nature conservation interest on the route and landscape and visual effects. Cumbria has an extensive network of roadside verges of special nature interest and any effects on these should be assessed. More information on the roadside verges can be obtained from Cumbria County Council. A formal transport assessment should be carried out for the route to a site and its access. When determining any improvement measure consideration should be given to biodiversity and landscape and visual effects." Under the new structure these become paragraphs 2.56-2.58.
276	60	Delete reference to distances and 'disturbing' in paragraph 5.26	This is not accepted as the distances and descriptors are based on credible research and guidance by SNH. However it is accepted that some qualification and references would assist in substantiating these points and sourcing further explanation.	Amend paragraph 5.26 insert after distances of about 10km " where blade movement is judged to be perceptible to the casual observer (Footnote: Visual Assessment of Wind Farms – Best Practice, University of Newcastle for SNH, 2002)" and at end "...are less disturbing especially in remote and tranquil surroundings". Under the new structure this becomes paragraph 1.75 Part 2.
277	103	Support paragraph 5.28 -5.35	Comments noted	No action required
278	30	Support G18 and the need to underground overhead wires.	Comments noted	No action required

ID	Consultee ID	Comments	Response	Action
279	77, 60	Paragraphs 5.28 -5.35 and G16, 17 and 18 over stated. Should be rationalised and condensed.	This is not accepted, these issues are based on extensive development control experience over the last 15 years. In recent years infrastructure effects have tended to increase in significance due to increases in the size of turbines. The technical issues and requirements are not considered to be overstated, they have been found to be frequently obscure in Environmental Statements and there is a need to raise awareness amongst planners, developers and others about them. They also justify the guidance that follows. They are intended to help prompt important primary mitigation measures as part of an iterative process informed by the assessment process. Therefore there is inevitably some overlap. However it is accepted that G16 is unnecessary as it is covered in the introduction at 5.2. It is also accepted that G17 should be more siting and design focused. The additional points/elements listed for inclusion in response ID 60 are generally covered in a more general way in the list of principles at G18 but it is accepted that there could be further refinement.	Delete G16. Delete last sentence of 5.29. Amend G17 "As part of site selection avoid long access routes along narrow, twisting or steep rural lanes, through villages and tightly built up areas. Minimise modifications and downgrade or reduce them at the end of the construction period, on decommissioning reinstate road alignments and boundary features." (under the new structure this becomes LG16, Part 2) Transfer assessment points to Part 3 page 6 and 11-12 (Under the new structure this becomes section 3, Part 2). Amend sub-title: "Transformers/... to "Meteorological Masts/Substations" Add after second sentence of paragraph 5.33: "The recent trend towards inclusion of lattice construction meteorological masts throughout the lifespan of the development similarly increases visual clutter." Amend list of principles under G18: "utilise existing buildings, landform and vegetative cover to house or screen ancillary structures" and "reinstate track verge and construction compounds with appropriate vegetation after the construction phase" "remove tracks and crane hard standings on decommissioning and reinstate with appropriate vegetation" add "locate borrow pits areas screened by existing landform or vegetation or within existing extraction areas" Under the new structure this becomes LG17, part 2.
280	77, 78	Paragraph 5.28 There is no evidence to suggest permanent harm to soils and vegetation from infrastructure and ancillary development.	Sensitive soils such as peat, once removed or damaged will take a significant amount of time to regenerate. The text should be amended to reflect this.	Amend paragraph 5.28 "Sensitive vegetation and soil types such as heather, semi-natural grassland or peat may not readily recover from construction disturbance and could be vulnerable in both ecological and landscape terms." Under the new structure this becomes paragraph 1.77 Part 2.
281	77,78	Paragraph 5.29 – access tracks required for construction are usually reinstated after construction.	This paragraph refers mostly to improvements needed to the local road network rather than tracks required on the site for access purposes. Paragraph 5.30 refers to internal access tracks. Cases have arisen where turbines have needed to be replaced and consideration is likely to be given during the design process to whether or not some access improvement works might be sought to be retained throughout the lifetime of the development. However, it is accepted that the text should change to clarify the position.	Anend the final part of paragraph 5.29 "These alterations may be left in place for the life span of the development or conditions may seek temporary remediation as there will be a requirement to reach the site for decommissioning, and possibly for repairs in the case of major component failure." Under the new structure this becomes paragraph 1.78 Part 2.

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282	79	Paragraph 5.34 should refer to the need to obtain consent for fencing on registered common land.	It is not considered appropriate to make a reference to this in the SPD. This section is referring to the effects that design could have on landscape character and not the need to seek permissions from relevant bodies.	No action required
283	77, 78	Paragraph 5.34 should not suggest that fencing can cause harm. Safety fencing used during construction is not left up.	It is accepted that safety fencing is usually temporary in nature. However paragraph 5.34 refers to permanent fencing that might be introduced to restrict grazing and support nature conservation enhancement.	No action required.
284	74	Support text on grid connection and undergrounding overhead lines in paragraph 5.35	Comment noted.	No action required
285				
286	79, 133	Undergrounding overhead wires should be strongly encouraged.	It is not accepted that text on this issue should be strengthened. It currently states that under grounding is the best option in landscape and visual terms and recommends that developers consider the effect of the electrical connection as part of the overall design principle.	No action required
287	65	A policy not to allow new overhead connections could increase costs which would need to be met by the developer.	It is not accepted that paragraph 5.35 seeks to set a policy to underground all overhead connections. It clearly states that under grounding is the best option in landscape and visual terms and recommends that developers consider the effect of the electrical connection as part of the overall design principle and with regard to other environmental considerations. The financial implications of developing a scheme are not relevant planning considerations. Minor amendments will be made to paragraph 5.35 to clarify this position.	Amend paragraph 5.35 to "Under grounding such power lines is preferable in landscape and visual impact terms, however, other environmental effects must also be considered when determining the best approach to take for a scheme." Delete the final sentence of paragraph 5.35. Under the new structure this becomes paragraph 1.84 part 2.
288	20, 28	Reference should be made to removing concrete bases/all traces of wind infrastructure as part of decommissioning in paragraph 5.32	It is general practice for concrete bases to be left in situ as part of the decommissioning process. It is usual to provide a soil/vegetation cap above the bases to ensure they are integrated with the surrounding landscape following decommissioning. The text suggests that it is likely that bases will be left in situ following decommissioning. This reflects current practice, but also enables negotiations to be held on a site by site basis to remove bases if it is considered appropriate. It is not accepted that the text should be amended.	No action required
289	77	Paragraph 5.35 - unacceptable to state that a scheme would be refused on the grounds of overhead wires.	This is accepted and the final sentence of paragraph 5.35 will be deleted.	Delete the final sentence of paragraph 5.35 and add to the new final sentence "when determining the best approach to take for a scheme." Under the new structure this becomes paragraph 1.84 Part 2.
290	103	Support paragraphs 5.36-5.37	Comments noted	No action required
291	114	Paragraph 5.36 should refer to locally native species for screen planting.	Detailed issues such as this would be dealt with on a site by site basis and take into account both landscape features and biodiversity opportunities in the area. It is not considered appropriate to include details in the SPD.	No action required

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292	66, 81	G18 refers to the removal of access roads as part of decommissioning. This is not usual practice and could result in greater damage than leaving in situ.	G18 seeks to provide good practice guidance on the siting and design of other infrastructure associated with wind proposals. As G18 seeks to highlight good practice it is considered flexible enough to enable the removal of access tracks that may be highly visible in the landscape and to enable those that are discrete to be left when decommissioning takes place. However, it is worth clarifying that the principles of G18 aim for good practice in recognition that other circumstances may arise where an alternative approach may be appropriate.	Amend the introduction to G18 "Infrastructure and ancillary developments should be carefully considered as part of the overall design of a scheme, using the following good practice principles:" Under the new structure this becomes the end of paragraph 4.10
293	103	Add reference to lighting and adverse effects on locations where dark skies are an asset to G18	It is not accepted that reference should be made to lighting as it is not a usual component of onshore wind energy development.	No action required
294	27, 99	Guidance point G18 should prevent development on peat.	It is not accepted that the SPD should prevent development on peat areas. This would be contrary to PPS22 and PPS9. However, it is appropriate to highlight that peat is an important landscape and nature conservation feature and that careful consideration of effects should be carried out at the detailed application stage. G18 seeks to do this.	No action required
295	78	Guidance point G18 is too restrictive	G18 seeks to provide guidance on the siting and design of other infrastructure associated with wind proposals and the full range of planning issues set out in the SPD. These issues will be set out in section 2, Part 1 and section 3, Part 2 under the new structure. G18 seeks to set good practice guidance and is not considered too restrictive.	No action required

ID	Consultee ID	Comments	Response	Action
296	74	Guidance point G18 should refer to all issues, not just landscape and visual and should relate to avoidance, mitigation and compensation.	It is accepted that infrastructure and ancillary development has a broader effect and the text in section 5 will be revised to reflect this. A new section will be added to expand the mitigation section as suggested. As part of the re structuring of the guidance the guidance relevant to landscape and visual effects only will be moved to Part 2.	Revise G18 and section 5, Part "Infrastructure and ancillary development, including road access, foundations, transformers and substation buildings, fencing and electrical connections could effect a range of environmental issues." Under the new structure this becomes paragraph 4.5 Part 1. Move landscape specific guidance to Part 2. Amend paragraph 5.36 "Mitigation will primarily be achieved through careful siting and an iterative design process following the guidance above. However, in some cases it may not be possible to mitigate on site, and secondary mitigations measures may be employed to address residual impacts. These could include off-site planting to screen specific receptors or provide compensatory habitats if a loss is likely as a result of a development. Experience has shown that wind energy developments present opportunities for enhancing both the development site and land outside the site, for example through restoration of hedgerows, stone walls and restoration/management of habitats such as heather moorland. When considering a planning application if appropriate mitigation, compensation or enhancement does not form part of the proposal, conditions may be attached to secure them and enable a development to go ahead. Consider environmental enhancement and compensation measures with reference to land management guidance set out in the Cumbria Landscape Strategy and the Cumbria Biodiversity Action Plan." Under the new structure these becomes paragraphs 4.12 and G19 Part 1.

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ID	Consultee ID	Comments	Response	Action
297	99	Restoration of landscape and habitats should be considered as part of any proposal.	It is accepted that the restoration of a site should be considered as part of the decommissioning phase. Text should be added after paragraph 5.37 to reflect this.	After paragraph 5.37 and key guidance, add in "Decommissioning and Site Restoration" "Planning consent will require sites to be decommissioned following cessation of energy production. Restoration of a site should be considered as part of the decommissioning process. Details should be included within a planning application and should consider the pre development characteristics of the site and the landscape and nature conservation aims and objectives of the area. Consider restoration measures with reference to land management guidance set out in the Cumbria Landscape Strategy, the Cumbria Biodiversity Action Plan and other relevant guidance." Under the new structure this becomes paragraph 4.12 and G19 Part 1.
298	114	Land management guidance referred to in G19 may be dated in the Cumbria Landscape Strategy.	It is accepted that this may be the case, but it is still considered a useful baseline for negotiations. However, it is recognised that the Cumbria Biodiversity Action Plan will be an important reference point to and a further reference will be added on this.	Amend G19 "Consider environmental enhancement and compensation measures with reference to land management guidance set out in the Cumbria Landscape Strategy and the Cumbria Biodiversity Action Plan."
299	103	Support paragraphs 5.38 – 5.39 and G20	Comments noted	No action required
300	60	Paragraph 5.38-39 and G20 should set out how development can be compatible if different size and speed turbines being used.	It is not considered appropriate for generic guidance such as this to be expanded further to set out details on how the design of extensions etc. can be made compatible with existing schemes. This will largely be dependant on the site specifics of a scheme. However, it is accepted that the compatibility parameters should be explored through visualisations from key viewpoints to investigate how apparent inconsistencies might be.	Add to end of paragraph 5.39 "These parameters should be explored through computer modelling and visualisations from key viewpoints to investigate how apparent any inconsistencies might be and to adjust the design accordingly." Under the new structure this becomes paragraph 1.89 Part 2.
301	81	G20 should emphasise that turbine proportion is more important for compatibility than turbine size.	This is not accepted. No evidence is provided to substantiate this comment. From experience relative importance will depend on site specifics ie the degree of difference and how they appear from key views. As a principle both need to be considered and explored through visualisations from key viewpoints.	Add to end of paragraph 5.39 "These parameters should be explored through computer modelling and visualisations from key viewpoints to investigate how apparent any inconsistencies might be and to adjust the design accordingly." Under the new structure this becomes paragraph 1.89 Part 2.
302	49	Guidance could be more specific and explicit on associated structures as they could become architectural landmarks through high quality design solutions.	It is accepted that any development could be designed and sited in such a way as to become a landmark. Paragraphs 5.30 – 5.35 seek to minimise effects of ancillary development based on the usual components associated with a wind energy development. It is likely that the turbines themselves will become a local landmark rather than the ancillary features. It is not accepted that the text should be amended to take into account these comments.	No action required

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ID	Consultee ID	Comments	Response	Action
303	77	Add more on design and guidance of associated structures	The SPD provides detailed guidance in section 5 on associated structures and infrastructure and their role in achieving an acceptable scheme. It is not accepted that further guidance should be provided.	No action required
304	23, 77	Move technical information to an appendix	It is accepted that the format of the SPD could be revised to provide clearer advice on the general issues effected by wind energy development and more technical information on issues relating to landscape and visual effects. This will assist users of the document in interpreting guidance. The technical landscape and visual information contained in sections 3, 4 and 5 of Part 1 will be moved to Part 2. As part of a restructure this will focus specifically on landscape and visual issues. General guidance on siting and design and cumulative effects on other planning issues will be included in Part 1.	Revise the presentation and format of the SPD to distinguish between general issues and more technical information on siting, design, landscape capacity and landscape and visual impact assessments. Integrate chapter 3 in Part 2, Landscape Capacity Assessment.
305	23, 63	Section 6 on other environmental issues should include formal guidelines as found in sections 4 and 5.	This is accepted. As a result of other comments on the need to ensure the full range of environmental issues are covered by the SPD section 6 will be expanded and key guidance highlighted throughout the section.	Highlight key guidance in former section 6. Under the new structure this becomes section 2, Part 1.
306	99, 113	Add more on site specific assessments at application stage	It is accepted that clearer guidance should be provided on the need to carry out detailed assessments on a range of issues at the site specific stage. Text will be added throughout the SPD to reflect this.	Revise text to include clear guidance on issues that may need more site specific assessment at the application stage.
307	42, 47	Support section on nature conservation	Comment noted	No action required
308	103	Nature conservation text should accord with PPS22.	It is accepted that the nature conservation text should accord with both PPS22 and PPS9. It should also accord with the requirements of a Habitats Regulations Assessment. This has been carried out for the SPD. The text will be amended accordingly.	Revise text to accord with PPS22, PPS9 and the Habitats Regulations Assessment.
309	61, 74, 106	Provide supporting evidence for nature conservation text.	It is not accepted that the SPD should contain a high level of evidence within the document to support the nature conservation text. This is available from a range of sources and these will be referred to in the document. It is accepted that maps should be added to identify international nature conservation sites. This will accord with the outcomes of the Habitats Regulations Assessment.	Add maps to Part 1 to identify SACs, SPAs and Ramsar sites associated with Cumbria to the end of Part 1.
310	67	A reference should be included on the Habitats Regulations Directive and ruling.	It is accepted that reference should be made to the requirements of the Habitats Regulations which interpret the Habitats Directive in British law. The Wind SPD is a relevant plan for the purpose of the application of the Habitats Directive. However, it is considered unnecessary to include a reference to the court rulings the SPD will identify the requirement for a Habitats Regulations Assessment to be carried out on any scheme that might cause likely significant effect on an European site. A Habitats Regulation Assessment has also been carried out on the SPD. The text will be revised to reflect the outcomes of this assessment.	Revise text in accordance with Habitats Regulation Assessment.
311	14, 21, 100	Development should not harm nature conservation interests.	There is a section included in the SPD to ensure that nature conservation issues are considered by any developer at the outset of the development process. This will be revised to accord with national, regional and local policy and the Habitats Regulations to protect sites and species from significant harm.	Revise text in accordance with Habitats Regulation Assessment.

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312	61, 126	The nature conservation section should refer to protected species outside of habitat designations, ie hen harriers.	It is accepted that references within the SPD could be amended to clarify the position on this. This was identified through the Habitats Regulations Assessment and the text has been revised accordingly.	Revise text in accordance with Habitats Regulation Assessment.
313	61,	Add reference to sensitive biodiversity areas in the nature conservation section.	It is accepted that a reference should be made to the fact that in Cumbria there are some areas that have a higher sensitivity due to the numbers of protected species that are found in an area. RSPB is developing an evidence base of this information and the SPD would benefit from signposting developers to this information.	Amend paragraph 6.15 "Assessments need to recognise that the species associated with such sites are often found elsewhere throughout Cumbria, particularly for over wintering. The RSPB is developing detailed information on areas such as these and developers should contact them early in the site selection process to determine if such species are likely to be associated with a site. For example information is available for moorland areas in the west of the Cumbria that provide an over wintering habitat for Hen Harriers." Under the new structure this becomes paragraph 2.26 Part 1.
314	25,	Nature conservation text is not given enough weight. It should have a section on its own.	The SPD includes a section on nature conservation, however, it is accepted that the format of the SPD could be revised to provide clearer advice on nature conservation and other planning related issues to ensure that readers are aware that equal weight should be attached to nature conservation as any other issue covered in the document.	Revise section on nature conservation, rename biodiversity and move as part of the section 6 to a new section 2, Part 1.
315	114	Add a reference to the need to carry out detailed field surveys when evaluating the nature conservation interests on a site. This is necessary and an assessment shouldn't just rely on records from other sources. Delete 'collaboration' and replace with '	This is accepted for the purposes of clarity.	Amend paragraph 6.19 "When carrying out assessment and evaluation information from local nature conservation bodies and Cumbria Wildlife Records Centre will help with data collection and interpretation. However this will not replace the need for detailed site surveys to be carried out at the appropriate time of year." Under the new structure this becomes paragraph 2.30 Part 1.
316	74	Refer to biodiversity targets in Draft Regional Planning Guidance.	It is accepted that the text on enhancement opportunities could be improved by reference to regional targets for biodiversity.	Add "New wind energy schemes may also provide the opportunity to enhance existing habitats and create new ones to support a range of species. These opportunities should be pursued where possible and be guided by biodiversity targets in the NW Regional Spatial Strategy and Cumbria BAP." to paragraph 6.5. Under the new structure this becomes paragraph 2.20 Part 1.
317	74	Identify the main constraints to biodiversity, the effect of wind on these and mitigation steps.	It is accepted that following this suggested structure would assist with the interpretation and understanding of the guidance.	Amend structure of the section on biodiversity to assist with interpretation.

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ID	Consultee ID	Comments	Response	Action
318	114	Support the use of the word 'must' in Paragraph 6.1 and change emphasis to 6.3.	These paragraphs have been deleted from the revised SPD and incorporated into a new introduction to a section that emphasises the need for equal consideration to be given to the full range of issues that need to be addressed by wind energy development.	See revised text in Paragraph 2.1, Part 1
319	114	Refer to Circular 06/05 Biodiversity and Geographical Conservation - Statutory Obligations and Their Impact Within the Planning System.	A reference will be inserted at the end of text on international and national designations to ensure developers are aware of the system they need to work within with regard to international and national designations. In addition a reference will be made at the end of the biodiversity section to the national guidance that developers need to work within.	Amend paragraph 6.5. "Any development that could have an adverse effect on the conservation objectives of a European or Ramsar wildlife site is not provided for in RSS Policy EM17, Policies 44 & 45, E34 and ST4 of the Joint Structure Plan 2001-2016 and policies in the emerging Local Development Frameworks and would not be in accordance with the development plan. It would not, therefore, have the benefit of S.38 of the 2004 Act at application stage. More guidance is contained in ODPM Circular 06/2005 , PPS9 and PPS22 on this. For national sites, wind energy schemes will need to demonstrate that they will not have an adverse effect on a SSSI. Strict measures would be taken to ensure that harmful effects on SSISI are avoided or mitigated against. Exceptions will only be made where the benefits clearly outweigh the impacts on the interests of the SSSI and its contribution to the national network of SSISI. More guidance is contained in ODPM Circular 06/2005 , PPS9 and PPS22." Under the new structure this becomes paragraph 2.11 Part 1. Add reference to PPS9, its good practice guide and circular 06/05 to the end of the section on biodiversity.
320	77	Paragraph 6.4 is misleading as it suggests all biodiversity interests could be harmed by wind energy development.	It is accepted that this paragraph could be better worded to reflect the opportunities that wind energy schemes could bring and that not all schemes are harmful.	Amend paragraph 6.4 "Wind energy schemes support the goal to reduce climate change and reduce potential changes to biodiversity globally and in the UK. They also have the potential to both enhance or adversely affect biodiversity and nature conservation interests. Cumbria is noted for a wealth of nature conservation interests. Some of these may be particularly rare or form part of wider biodiversity networks important on more than a local scale. It is crucial for any development to take these interests into account, reducing adverse effects and considering opportunities for enhancement." Under the new structure this becomes paragraph 2.8 Part 1.

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321	114	Paragraph 6.5 should be split to consider mitigation and enhancement issues separately.	Accepted to help clarify the distinction between mitigation necessary to reduce negative effects and enhancement that can be sought in accordance with PPS9.	Amend the last sentence of paragraph 6.5 "New wind energy schemes may also provide the opportunity to enhance existing habitats and create new ones to support a range of species. These opportunities should be pursued where possible and be guided by biodiversity targets in the NW Regional Spatial Strategy and Cumbria BAP.." Under the new structure this becomes a new paragraph 2.20 Part 1.
322	74	Support paragraph 6.5 and add text on 'in combination' assessment of Habitats Regulation and the need for an EIA to include a Habitats Regulation Assessment.	Accept. This reflects the need to carry out an assessment in accordance with the Habitats Regulations.	Amend paragraph 6.8 "...In accordance with the Habitats Regulations an assessment needs to be carried out for each new development to determine if it would have a likely significant effect, alone or in combination with other plans or projects, on sites or features associated with an international designation. If likely significant effect is determined developers are expected to provide relevant information to the Local Planning Authority to enable it to carry out an Appropriate Assessment." Under the new structure this becomes paragraph 2.10 Part 1.
323	114	In paragraph 6.5 amend 'may' to 'would'	Accept this change to accord with PPS7 and PPS22.	In paragraph 6.5 amend "Mitigation of such effects would be required but in some circumstances.." Under the new structure this becomes paragraph 2.19 Part 1.
324	77, 78, 83	Paragraph 6.6 should refer to benefits that wind energy can bring to a site and by reversing climate change.	It is accepted that wind energy schemes can provide the opportunity to enhance the biodiversity of a site, and to contribute towards mitigating the harmful effects of climate change. The introductory text to this section will be strengthened and made more positive.	Add to paragraph 6.4 "Wind energy schemes support the goal to reduce climate change and reduce potential changes to biodiversity globally and in the UK. They also have the potential to both enhance or adversely affect biodiversity and nature conservation interests. Cumbria is noted for a wealth of nature conservation interests. Some of these may be particularly rare or form part of wider biodiversity networks important on more than a local scale. It is crucial for any development to take these interests into account, reducing adverse effects and considering opportunities for enhancement." Under the new structure this becomes paragraph 2.8 Part 1.
325	21, 61	Paragraph 6.6 should stress collision of birds and development should take into account flight paths.	Accept for the purpose of clarity	Add "such as birds" to paragraph 6.6, 5th bullet. Under the new structure this becomes paragraph 2.21 Part 1.

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ID	Consultee ID	Comments	Response	Action
326	44, 114	Reword section 6.8 to distinguish between European and other sites.	This is accepted for the purposes of clarity and to accord with the Habitats Regulations Assessment.	Amend paragraph 6.8 "For international sites, and features that they support, new schemes need to demonstrate that they will not adversely affect their conservation value. Schemes should not cause harm to habitats and species outside a designated site that may adversely affect the integrity of a site, or cause a significant decline in the size, distribution, structure or function of a population of a species for which a site was designated. In accordance with the Habitats Regulations an assessment needs to be carried out for each new development to determine if it would have a likely significant effect, alone or in combination with other plans or projects, on sites or features associated with an international designation. If likely significant effect is determined developers are expected to provide relevant information to the Local Planning Authority to enable it to carry out an Appropriate Assessment. Any development that could have an adverse effect on the conservation objectives of a European or Ramsar wildlife site is not provided for in RSS Policy EM17, Policies 44 & 45, E34 and ST4 of the Joint Structure Plan 2001-2016 and policies in the emerging Local Development Frameworks and would not be in accordance with the development plan. It would not, therefore, have the benefit of S.38 of the 2004 Act at application stage. More guidance is contained in ODPM Circular 06/2005 , PPS9 and PPS22." Under the new structure these become paragraphs 2.10 and 2.11.
327	61	Paragraph 6.8 should refer to designated species.	It is not accepted that the SPD should refer to designated species aswell. The Habitats Regulations Assessment of the SPD identifies all the international sites and details the primary and qualifying features associated with them. In addition information on protected species is available form several sources within Cumbria which are referenced in the SPD.	Identify and assess the likely significant effect of the SPD on the international site and their features as part of the Habitats Regulations Assessment.

ID	Consultee ID	Comments	Response	Action
328	74	Support the principle of paragraph 6.8 but need to raise profile of European Sites and Features.	This is accepted and in accordance with the findings of the Habitats Regulation assessment revised text has been included.	Revise paragraph 6.8 "For international sites, and features that they support, new schemes need to demonstrate that they will not adversely affect their conservation value. Schemes should not cause harm to habitats and species outside a designated site that may adversely affect the integrity of a site, or cause a significant decline in the size, distribution, structure or function of a population of a species for which a site was designated. In accordance with the Habitats Regulations an assessment needs to be carried out for each new development to determine if it would have a likely significant effect, alone or in combination with other plans or projects, on sites or features associated with an international designation. If likely significant effect is determined developers are expected to provide relevant information to the Local Planning Authority to enable it to carry out an Appropriate Assessment." Under the new structure this becomes paragraph 2.10 Part 1.

ID	Consultee ID	Comments	Response	Action
329	44, 66 71,77, 78, 83	Amend or delete the reference to avoiding international sites in paragraph 6.8 as it is contrary to PPS22.	<p>It is accepted that PSS 22 states that exceptional circumstances may arise where a wind energy development could go ahead despite causing adverse effects to an internationally protected site. These circumstances are set out in a range of wildlife legislation and regulations. However, it is not necessary for the SPD to duplicate such national guidance. In accordance with the Habitats Regulations an assessment has been carried out to ensure the SPD would not cause likely significant effect, alone or in combination with other plans and projects, to international sites and features.</p> <p>Paragraph 6.8 has been revised on the advice of Natural England. It was agreed that the text would not refer to the exceptional circumstances as they are detailed and a clear reference is given to them in national guidance. If a scheme was to come forward that caused significant effect to an international site, it would be considered against national and local policy that acknowledge that exceptional circumstances may need to be considered. The text will cross reference to national guidance so developers are aware that the SPD seeks to accord with such guidance without duplicating it unnecessarily.</p>	<p>Amend paragraph 6.8 "For international sites, and features that they support, new schemes need to demonstrate that they will not adversely affect their conservation value. Schemes should not cause harm to habitats and species outside a designated site that may adversely affect the integrity of a site, or cause a significant decline in the size, distribution, structure or function of a population of a species for which a site was designated. In accordance with the Habitats Regulations an assessment needs to be carried out for each new development to determine if it would have a likely significant effect, alone or in combination with other plans or projects, on sites or features associated with an international designation. If likely significant effect is determined developers are expected to provide relevant information to the Local Planning Authority to enable it to carry out an Appropriate Assessment. Any development that could have an adverse effect on the conservation objectives of a European or Ramsar wildlife site is not provided for in RSS Policy EM17, Policies 44 & 45, E34 and ST4 of the Joint Structure Plan 2001-2016 and policies in the emerging Local Development Frameworks and would not be in accordance with the development plan. It would not, therefore, have the benefit of S.38 of the 2004 Act at application stage. More guidance is contained in ODPM Circular 06/2005 , PPS9 and PPS22." Under the new structure these become paragraphs 2.10 and 2.11.</p>
330	60	Paragraph 6.9 does not accord with PPS9 and should be amended.	It is accepted that the text should be revised to reflect PPS9 and the need for wind energy schemes to not significant harm to regional and local designations.	Add "significant" before harm in the final sentence of paragraph 6.9. Under the new structure this becomes paragraph 2.15 Part 1.
331	61	Add reference to non designated sites to reflect PPS22 and PSS9.	It is accepted that a reference should be included as all local planning authorities have a duty to consider the effects of development on biodiversity generally and seek opportunities to enhance and protect it.	Add the following paragraph to the start of paragraph 6.10 "It is also important for developers to consider the effects of development on non designated sites and species." Under the new structure this becomes paragraph 2.16 Part 1.
332	61	Support paragraph 6.11, 6.14	Comment noted	No action required

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333	114	What is afforded protection under the National Trusts Act.	The National Trust have a right to protect wildlife on land it owns under the National Trusts Act 1907. However, as many of the sites and species are afforded other international or national protection it is unnecessary to refer to the National Trusts Act also.	Delete the reference to the National Trusts Act in paragraph 6.9.
334	35	Support paragraph 6.10, 6.12 – 6.16.	Comments noted.	No action required.
335	103, 114	Amend English Nature to Natural England in paragraph 6.11.	Accepted.	Amend paragraph 6.11 as set out here. Under the new structure this becomes paragraph 2.18 Part 1.
336	114	Add 'all' before bats in paragraph 6.12 and delete second sentence.	Accepted for purposes of clarity.	Add 'All' to the start of paragraph 6.12.
337	77, 81	Add a reference to paragraph 6.13 'if bat activity is likely'. It would be unacceptable to expect a survey as part of an EIA if no bat activity was likely.	It is accepted that evidence of bats needs to be established in the vicinity of a development before more detailed work is carried out. A reference will be added to reflect this.	Add a reference to paragraph 6.13 'in an area where bat activity is likely'. Under the new structure this becomes paragraph 2.24 Part 1.
338	114	Add reference to Bat Mitigation and Bat Survey guidelines in paragraph 6.13.	Accepted for purposes of clarity and to signpost developers to further good practice guidance.	Amend paragraph 6.13 "For bats, in area where bat activity is likely, work will need to be carried out to establish roosts, flight lines, feeding areas, hibernation or swarming sites in the vicinity of a proposal as part of an EIA or planning statement. The results of such surveys should assist in identifying the appropriateness of the scheme, its design and layout. If a foraging habitat is likely to be affected by a scheme, then mitigation measures would be expected to ensure additional habitat is provided for within the locality and to reduce the potential for harm, however it take time to establish new habitat. Such work should be carried out in accordance with Bat Mitigation Guidelines, English Nature, 2005 and Bat Survey Guidelines, Bat Conservation Trust, April 2007." Under the new structure this becomes paragraph 2.24 Part 1.
339	78	Add reference to paragraph 6.14 on BWEA/RSPB dialogue.	The SPD currently signposts developers to good practice guidance developed by BWEA in association with others - 'Wind farm development and Nature Conservation, English Nature, RSPB, WWF and BWEA, 2001' However, as the other good practice guidance is generally referred to in the text a reference will be added on this also.	Add to the end of paragraph 6.7 "Further guidance on biodiversity issues can be found in 'Wind farm development and Nature Conservation, English Nature, RSPB, WWF and BWEA, 2001'." Under the new structure this becomes paragraph 2.22 Part 1.

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340	114	Amend paragraph 6.15 to reflect the need to protect protected species on and offsite	This is accepted as several types of protected species can be found off the designated site they are associated with throughout Cumbria. This also accords with the findings of the Habitats Regulations Assessment.	Amend paragraph 6.15 "...Careful consideration needs to be given to SPA, SAC, and RAMSAR sites and species which are often associated with coastal and moorland/upland areas. Birds such as whooper swans, pink footed geese and greylag geese could be affected by wind energy schemes. Species are often associated with areas off the site for feeding, roosting and over wintering. This is particularly the case for Hen Harriers from the Bewcastle Hills SPA that over winter on moorland in the west of Cumbria. Areas close to international sites have had the greatest interest from wind energy development in the past and steps need to be taken to ensure there is no harm to these interests." Under the new structure this becomes paragraph 2.26 Part 1.
341	30, 114	Support paragraph 6.18	Comment noted	No action required
342	114	Paragraph 6.18 bullets should refer to Cumbria BAP species	It is accepted that the guidance can be strengthened by adding a reference to locally important species.	Amend the second bullet in paragraph 6.18 "Identification of protected and priority habitats and species, including those of local importance." Under the new structure this becomes paragraph 2.29 Part 1 3rd bullet.
343	114	Move bullet point 3 up to the top of the list in paragraph 6.18.	Accepted for purpose of clarity.	Move bullet point 3 up to the top of the list in paragraph 6.18. Under the new structure this becomes paragraph 2.29 Part 1.
344	61, 35	Design and mitigation should be in the main design section and not isolated in the section on nature conservation.	It is accepted that a general design section should be developed to cover the full range of issues addressed by the SPD. The text will be deleted from this section and a general section that applies to all planning issues will be introduced in Part 1.	Delete paragraph 6.17. As part of the revised structure of the SPD introduce a new section covering design and mitigation for all issues in Part 1.
345	66	The importance of using professionals at the start of the EIA process should be highlighted earlier in the document.	It is accepted that the use of any specialist advisors should be at the start of the EIA process. Under the new structure the second section will highlight key planning issues and reference to the use of such advisors at the start of the EIA process should be added.	Add new paragraph to new section 2 "For schemes of two turbines or more, and those with a hub height that exceeds 15m, a full Environmental Impact Assessment is required in accordance with the Environmental Assessment Regulations. A range of specialist advisors may be needed at the start of this process to ensure the issues set out below are properly considered." Under the new structure this becomes paragraph 2.2 Part 1.

ID	Consultee ID	Comments	Response	Action
346	35	Paragraph 6.20 should distinguish between the guidance developers need to follow, ie PPS9 and the good practice the guide is advocating they follow.	Accepted, for the purposes of clarity.	Amend paragraph 6.20 to distinguish between the guidance developers need to follow, ie PPS9 and the good practice the guide is advocating they follow. Under the new structure this becomes paragraph 2.31 Part 1.
347	67, 103	Support paragraph 6.21	Comments noted. However due to comments from other consultees this section will be amended.	Amend paragraph 6.21 "Developers should consider the effect a scheme might have on the soils, hydrology and water quality of a site and its surrounding watercourses. Cumbria has areas of soils that can be easily harmed, be made unstable and that can take a long time to regenerate, such as peat. Disturbances to peat can releases CO2 into the atmosphere, however studies have shown that it is unlikely that this would be greater than the CO2 saved by renewable energy production . Proposals that are being developed in areas with sensitive soils would need to demonstrate any harmful impacts and should avoid areas with such soil if they are identified as being of principal importance for the conservation of biodiversity. It is important not to cause significant harm to the integrity of local watercourses as this could create harm to nature conservation interests in the vicinity of a proposal. G10 Consideration should be given to effects on soils, hydrology and water quality in and around a site. Development should avoid harming soils, hydrology and water quality that would negatively affect habitats of principal importance for the conservation of biodiversity, or other protected species or habitats." Under the new structure this becomes paragraph 2.71 - 2.72 Part 1.

ID	Consultee ID	Comments	Response	Action
348	42, 77, 78, 81	Delete references to peat and CO2 release and the need to avoid such soils in paragraph 6.21	Section 6 contains a small section on soils and hydrology to reflect the initial findings of the Sustainability Appraisal. It is appropriate to include a reference to peat in this section as it is a habitat that is listed as having a principle importance in PPS 9 and as such one that local planning authorities should be seeking to conserve. This section is supported by the Environment Agency. It is recognised that although the disturbance of peat can cause a release of carbon dioxide, the carbon dioxide saved through renewable energy production is likely to be greater. It is accepted that the text should be revised in this section to reflect this situation more accurately.	Amend paragraph 6.21 "Developers should consider the effect a scheme might have on the soils, hydrology and water quality of a site and its surrounding watercourses. Cumbria has areas of soils that can be easily harmed, be made unstable and that can take a long time to regenerate, such as peat. Disturbances to peat can releases CO2 into the atmosphere, however studies have shown that it is unlikely that this would be greater than the CO2 saved by renewable energy production . Proposals that are being developed in areas with sensitive soils would need to demonstrate any harmful impacts and should avoid areas with such soil if they are identified as being of principal importance for the conservation of biodiversity. It is important not to cause significant harm to the integrity of local watercourses as this could create harm to nature conservation interests in the vicinity of a proposal.
349	42	Protect Regionally Important Geological Sites (RIGS)	The SPD considers the contribution that RIGS make to the character of a landscape and its value as part of the landscape capacity assessment. In addition local planning policies seek to set out how development will be assessed for such sites. It is not accepted that the SPD should add further protection to RIGS or preclude development on them. To do so would be contrary to PPS22 and PPS9.	G10 Consideration should be given to effects on soils, hydrology and water quality in and around a site. Development should avoid harming soils, hydrology and water quality that could negatively effect habitats of principal importance for the conservation of biodiversity, or other protected species or habitats." Under the new structure these become paragraphs 2.71 - 2.72 Part 1.

ID	Consultee ID	Comments	Response	Action
350	42	Add more on soils and hydrology (incl. peat)	A small section exists on soils and hydrology to reflect the findings of the Sustainability Appraisal. It is not accepted that this should be extended significantly but should highlight the issues that developers need to be aware of.	Amend paragraph 6.21 "Developers should consider the effect a scheme might have on the soils, hydrology and water quality of a site and its surrounding watercourses. Cumbria has areas of soils that can be easily harmed, be made unstable and can take a long time to regenerate, such as peat. Disturbances to peat can release CO ₂ into the atmosphere, however studies have shown that it is unlikely that this would be greater than the CO ₂ saved by renewable energy production. Proposals that are being developed in areas with sensitive soils would need to demonstrate any harmful impacts and should avoid areas with such soil if they are identified as being of principal importance for the conservation of biodiversity. It is important not to harm the integrity of local watercourses as this may create harm to nature conservation interests in the vicinity of a proposal. Care needs to be taken when assessing such issues and should be included as part of the EIA or planning statement. G10 Consideration should be given to effects on soils, hydrology and water quality in and around a site. Development should avoid harming soils, hydrology and water quality that could negatively affect habitats of principal importance for the conservation of biodiversity, or other protected species or habitats." Under the new structure these become paragraph 2.71 - 2.72 Part 1.
351	100	Development should not pollute the water table	A section is included in the guidance on hydrology to ensure such issues are fully considered by any new wind energy development and to prevent significant harm arising.	Amend paragraph 6.21 "It is important not to harm the integrity of local watercourses as this may create harm to nature conservation interests in the vicinity of a proposal." Under the new structure this becomes paragraph 2.72 Part 1.
352	47	Support cultural heritage section. Comment noted		No action required

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353	103	Revise 6.22 to reflect the settings of cultural heritage.	It is accepted that consideration should be given to the settings of significant designated and undesignated sites.	Amend paragraph 6.22 "Experience suggests there is often flexibility in the design and siting of wind energy schemes which provides the opportunity to avoid direct damage to archaeological remains. However, when considering such issues, all other issues identified in this part of the guide also need to be taken into account. Any development should consider the effects it may have on the following aspects as part of the design and environmental assessment processes: Archaeological remains a. Historic structures and buildings b. Designed landscapes c. Historic character and associations with the wider landscape d. Designated and undesignated sites and areas e. Effects on settings of significant designated and undesignated sites and areas f. Effects on cultural landscapes such as Areas of Outstanding Natural Beauty and National Parks." Under the new structure this becomes paragraph 2.50 Part 1.
354	1	Recognise AONBs as cultural landscapes	The purpose of designation for National Parks and Areas of Outstanding Natural Beauty both include the need to conserve and enhance the natural beauty. It is recognised that landscape features, cultural heritage and wildlife features all contribute towards the natural beauty of an area. The landscape capacity assessment considers the effect of wind energy development on Areas of Outstanding Natural Beauty and National Parks. This assessment included the consideration of cultural associations when determining the value of a landscape. It is therefore accepted that national landscape designations should be recognised as cultural landscape.	Add to paragraph 6.23 "The Lake District is currently under consideration for nomination as a World Heritage site and the National Parks and Areas of Outstanding Natural Beauty have cultural associations also." Under the new structure this becomes paragraph 2.47 Part 1.
355	1	In paragraph 6.23 reference to The Hadrian's Wall World Heritage site needs to be changed to Frontiers of the Roman Empire: Hadrian's Wall.	This is accepted.	Text will be changed where necessary.

ID	Consultee ID	Comments	Response	Action
356	1	Include advice on working with the WHS Management Plan and reference to its setting/buffer zone.	A cross reference will be made in the signposting section to the Frontiers of the Roman Empire: Hadrian's Wall Management Plan. Text will be added to reflect its setting in relation to broader guidance from PPS22 that prevents setting general buffer zones around international designations.	Add "This guidance does not identify buffer zones around any international or national designations, but developments proposed close to the boundaries of these designations will need to assess their effects on the their settings, including views associated with registered historic parks and gardens. Although PPS22 prevents the identification of buffer zones around international and national designations, World Heritage Sites can be more formally defined than other designations. This is the case for Frontiers of the Roman Empire: Hadrian's Wall which has been mapped and is linked to the Site's inscription on the World Heritage List. The effects of any scheme must be considered against this defined setting." Under the new structure this becomes paragraph 2.49 Part 1. Add a reference to the FRE:HW Management Plan to the end of the section.
357	47, 79	Support paragraph 6.24	Comments noted	No action required
358	83	Paragraph 6.25 does not accord with PPS22 and should refer to designated sites only.	This is accepted and the text should be revised accordingly.	Amend paragraph 6.25 "The design and siting of a scheme should avoid internationally and nationally important historic sites." Under the new structure this becomes paragraph 2.53 Part 1.
359	1, 103	Add more on historic environment including sensitivity/significance/Historic Landscape Characterisation/toolkit for developers.	The landscape capacity assessment takes into account the historic environment when considering its value. The SPD currently refers to English Heritage guidance on wind development and it is not considered appropriate to extend this significantly to include sensitivity analysis of the historic environment. The Historic Landscape Characterisation work is not yet complete across Cumbria and could not be included in the landscape capacity assessment. However, it is accepted that more information could be provided on the process that developers would be expected to follow. Paragraph 6.2 already highlights the importance of assessing the effects of wind schemes on designated and undesignated site and their settings. However it is accepted that reference to settings should be included in paragraph 6.23 also. This would accord with PPG 15.	Revise text on Cultural Heritage in Part 1 to provide more information on significance and sensitivity and issues developers should address. See paragraphs 2.46 - 2.55 under the new structure.
360	47	Support noise section	Comment noted	No action required

ID	Consultee ID	Comments	Response	Action
361	103	The SPD should refer to the effect of noise on non residential activities.	This is accepted in part. The SPD refers to noise sensitive development. ETSU R-97 guidance on the Assessment of Rating of Noise from wind farms sets out that wind farm noise should be controlled by applying limits to noise sensitive properties. Noise limits should be applied to external locations and only to those areas frequently used for relaxation or activities for which a quiet environment is highly desirable. Noise limits set relative to background noise are more appropriate in the majority of cases. It is accepted that a reference could be added to indicate that quiet leisure based properties could also be considered sensitive.	Amend paragraph 6.29 "When considering a proposal developers should identify any noise sensitive development, such as residences, or quiet leisure based businesses, and carry out a noise assessment to determine whether or not there might be any potential impacts on them. In most cases, turbines can be sited at a suitable distance from such development so as not to cause undue harm. If this is not the case, developers should carry out design alterations to mitigate any unacceptable noise impacts. If necessary, the local planning authority may attach conditions to the consent for a scheme to ensure noise limits are not exceeded." Under the new structure this becomes paragraph 2.64 Part 1.
362	1, 53, 60, 77,78	Delete misleading references to noise being a negative effect in paragraph 6.27.	It is appropriate for the SPD to contain advice on noise. It is a relevant planning issue when assessing the effect of a scheme on local amenity and accords with local plan policies and Government guidance. It is accepted that the noise text should be reviewed to ensure it accords with current guidance in PPS22, its Companion Guide and ETSU-R-97. PPS22 highlights that wind turbines may generate small increases in noise levels and that LPAs should ensure that development is located and designed in such a way to minimise increases in ambient noise levels in such a way that noise levels are acceptable around noise sensitive developments. The SPD reflects the need for noise assessments to be carried out in accordance with ETSU – R- 97 which accords with the current UK guidance on assessing and rating noise arising from wind turbines. It is not accepted that more information should be added on the negative effects of noise beyond UK guidance, or that reference to noise should be deleted altogether. However, it is accepted that the text could be revised to clarify that although noise is a commonly perceived concern careful specification, design and siting can minimise increases in ambient noise levels with modern day turbines.	Amend paragraph 6.28 "Although it is commonly perceived that noise will cause an adverse impact on local amenity, well specified and designed schemes can be sited with sufficient distance from noise sensitive development to ensure increases in ambient noise levels are acceptable. Improvements in technology have significantly reduced the level of mechanical noise produced. The noise associated with most wind energy developments is usually low, and has been likened to the noise of wind in trees . It is also widely agreed that there will always be some background noise, even in rural areas, from farm machinery, local traffic, animals, the wind interacting with trees, and buildings etc. " Under the new structure this becomes paragraph 2.63 Part 1.

ID	Consultee ID	Comments	Response	Action
363	67	Add reference to European Parliament Directive 2002/49/EC on assessment and management of environmental noise. This takes precedence over ETSU-R-97.	<p>It is not accepted that a reference to the European Directive should be added to the document. The Environmental Noise (England) Regulations 2006 give effect to EU Directive 2002/49/E, relating to the assessment and management of environmental noise. The Government is committed to developing a National Noise Strategy by the end of 2007 and is working on defining 'Quiet Areas' urban areas during 2007. Following this it will work to define 'Quiet Areas' in open countryside. It will be developing Action Plans to support these quiet areas in the long term. As a result of the Environmental Noise Regulations, no changes to noise assessment, and in particular ETSU-R-97 have been proposed to date. However, it is accepted that guidance on noise might change as the Government implements the Regulations, and following a review that is being carried out on aerodynamic modulation. A report on current research on aerodynamic modulation in relation to wind farms is due to be published this summer and will seek for further research to be carried out before any recommendations are made. Therefore it is accepted that a reference could be added to the text on the need for developers to follow any subsequent guidance from UK government that may be issued.</p>	Delete final sentence of paragraph 6.30 and add "...If, in the future, revised guidance is issued by the UK government on the assessment of noise, any development will be expected accord with this." Under the new structure this becomes paragraph 2.65 Part 1.
364	139	Add more on noise to educate those that may have a development near them.	<p>It is accepted that the SPD should contain advice on noise. It is a relevant planning issue when assessing the effect of a scheme on local amenity and accords with local plan policies and Government guidance. It is accepted that the noise text should be reviewed to ensure it accords with current guidance in PPS22, its Companion Guide and ETSU-R-97. PPS22 highlights that wind turbines may generate small increases in noise levels and that LPAs should ensure that development is located and designed in such a way to minimise increases in ambient noise levels in such a way that noise levels are acceptable around noise sensitive developments. The SPD reflects the need for noise assessments to be carried out in accordance with ETSU – R- 97 which accords with the current UK guidance on assessing and rating noise arising from wind turbines. It is accepted that the text could be revised to clarify that although noise is a commonly perceived concern careful specification, design and siting can minimise increases in ambient noise levels with modern day turbines.</p>	Amend paragraph 6.28 "Although it is commonly perceived that noise will cause an adverse impact on local amenity, well specified and designed schemes can be sited with sufficient distance from noise sensitive development to ensure increases in ambient noise levels are acceptable. Improvements in technology have significantly reduced the level of mechanical noise produced. The noise associated with most wind energy developments is usually low, and has been likened to the noise of wind in trees . It is also widely agreed that there will always be some background noise, even in rural areas, from farm machinery, local traffic, animals, the wind interacting with trees, and buildings etc. " Under the new structure this becomes paragraph 2.63 Part 1.

ID	Consultee ID	Comments	Response	Action
365	1, 34, 43, 67, 87, 93, 91, 100, 110, 120	Add more on negative effects from noise, taking into account the recent Hayes McKenzie report and upcoming review of ETSU-R-97.	<p>It is accepted that the noise text should be reviewed to ensure it accords with current guidance in PPS22, its Companion Guide and ETSU-R-97. PPS22 highlights that wind turbines may generate small increases in noise levels and that LPAs should ensure that development is located and designed to in such a way to minimise increases in ambient noise levels in such a way that noise levels are acceptable around noise sensitive developments. The table contained in section 6 is taken from the Companion Guide. The SPD reflects the need for noise assessments to be carried out in accordance with ETSU-R-97 which accords with the current UK guidance on assessing and rating noise arising from wind turbines. It is not accepted that more information should be added on the negative effects of noise beyond published UK government guidance, or that reference to noise should be deleted altogether. It is not accepted that the SPD should change to reflect the findings of the Hayes McKenzie report. A statement from the DTI showed that this report concluded there is no evidence of health effects arising from infrasound or low frequency noise generated by wind turbines. It confirms that local planning authorities should continue to use advice in PPS22, its Companion Guide and ETSU-R-97 on the assessment and rating of noise from wind farms. It also confirms that further studies are being carried out to determine whether or not Aerodynamic Modulation (AM) is an issue that requires attention in the context of ETSU-R-97. An advisory group is working on this issue and if it is felt appropriate to reflect AM in the context of ETSU-R-97 further information will be issued. Any future information forthcoming on noise assessment would need to be considered by future proposals. It is accepted that a reference should be added to highlight the need for noise assessment to be in accordance with ETSU R 97 and any other UK guidance that may emerge in the future.</p>	<p>Delete final sentence of paragraph 6.30 and add "...If, in the future, revised guidance is issued by the UK government on the assessment of noise, any development will be expected accord with such guidance." Under the new structure this becomes paragraph 2.65 Part 1.</p>
366	67	Paragraph 6.27 should refer to compressive noise and low frequency noise also to prevent legal challenge by omission on health and safety grounds.	<p>It is not accepted that more information should be added on the negative effects of noise beyond published UK government guidance or refer to other types of noise or be changed to reflect the findings of the Hayes McKenzie report. A statement from the DTI showed that this report concluded there is no evidence of health effects arising from infrasound or low frequency noise generated by wind turbines. It also confirms that local planning authorities should continue to use advice in PPS22, its Companion Guide and ETSU-R-97 on the assessment and rating of noise from wind farms. It also confirms that further studies are being carried out to determine whether or not Aerodynamic Modulation (AM) is an issue that requires attention in the context of ETSU-R-97. An advisory group is working on this issue and if it is felt appropriate to reflect AM in the context of ETSU-R-97 further information will be issued. Any future information forthcoming on noise assessment would need to be considered by future proposals. It is accepted that a reference should be added to highlight the need for noise assessment to be in accordance with ETSU R 97 and any other UK guidance that may emerge as a result of the review of AM.</p>	<p>Delete final sentence of paragraph 6.30 and add "...If, in the future, revised guidance is issued by the UK government on the assessment of noise, any development will be expected accord with such guidance." Under the new structure this becomes paragraph 2.65 Part 1.</p>
367	60	Paragraph 6.30 should refer to the detail of ETSU-R-97 as this contains the acceptable limits for noise.	<p>This is accepted and reference is already made to ETSU guidance, as set out in PPS22 Companion guide in paragraph 6.30. However the reference to the decibels that might be acceptable does not reflect the guidance contained in ETSU-R-97 exactly and should be deleted along with paragraph 6.31 and the associated table. the reference to the table should also be deleted from paragraph 6.28.</p>	<p>Delete second sentence in paragraph 6.28, the final sentence to paragraph 6.30, and paragraph 6.31 and associated table below.</p>
368	77, 78	The entry for rural background noise should appear above quiet bedroom in the table. Clarify why table refers to 350m distances.	<p>The table was directly copied from the Technical Annex in PPS22 and follows its ordering and references to distances. However, as the reference to decibels is being deleted from paragraph 6.30, as it does not adequately represent the guidance in ETSU-R-97, the table will be deleted also.</p>	<p>Delete final sentence to paragraph 6.30, 6.31 and associated table below.</p>

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ID	Consultee ID	Comments	Response	Action
369	1, 34, 51, 67, 120, 128	Add min. distance limits between dwellings and turbines (noise/amenity), 350m is not acceptable and should be extended to 1- 1.5km.	It is not considered acceptable to introduce minimum distances between dwellings and turbines. Although PPS22 suggests that minimum separation distances can be identified between renewable energy development and existing development it is considered more appropriate to establish this on a site by site basis based on a detailed noise assessment and taking into account local landform and features, type of turbine and site characteristics. The reference to 350m is taken from the Companion Guide to PPS22 and it states that greater distances might be required to reduce unacceptable noise during the night. However, as the reference to decibels is being deleted from paragraph 6.30, as it does not adequately represent the guidance in ETSU-R-97, the table will be deleted also.	Delete final sentence to paragraph 6.30, 6.31 and associated table below.
370	16	It is not accepted that any claimed negative effects on noise, shadow flicker or electro magnetic radiation have any bearing on human health.	The SPD does not refer to any effects to human health with regard to these issues. However such issues are relevant planning issues that need to be considered and a reference to this will remain in the SPD.	No action required
371	32, 51, 137	Add more on shadow flicker.	Shadow flicker is referred to in several parts of the SPD, particularly with regard to local amenity. The SPD makes it clear, in accordance with PPS22 that developers will need to consider the effects of shadow flicker when preparing a development. However, the SPD does not refer to it in detail as it is only likely to occur in very few situations and can usually be mitigated against. It is not accepted that specific guidance should be included in the SPD as there is sufficient in PPS22's companion guide and developers will be expected to consider effects against this. A reference will be added to reflect this approach.	Add to the end of the introduction to local amenity "Other local amenity issues could include shadow flicker and electromagnetic radiation, but any effects arising from these are rare and developers are guided to PPS22 Companion Guide for more advice on dealing with such issues." Under the new structure this becomes paragraph 2.61, Part 1.
372	51, 87	Reference should be made to electro magnetic fields and radiation.	It is accepted that wind turbines, as they contain electrical machines that produce power, produce some electromagnetic radiation. However, this is at a very low level, and according to guidance in PPS22, presents no greater risk to human health than most domestic appliances. This goes on to state that only in very rare circumstances will electromagnetic signals be produced. It is not accepted that specific guidance should be included in the SPD as there is sufficient in PPS22's companion guide and developers will be expected to consider effects against this. A reference will be added to reflect this approach.	Add to the end of the introduction to local amenity "Other local amenity issues could include shadow flicker and electromagnetic radiation, but any effects arising from these are rare and developers are guided to PPS22 Companion Guide for more advice on dealing with such issues." Under the new structure this becomes paragraph 2.61, Part 1.
373	50	Support paragraph 6.33 and 6.34 Comment noted		No action required

ID	Consultee ID	Comments	Response	Action
374	2, 34, 50, 51, 62, 68, 94, 95, 107, 110	Strengthen paragraph 6.34 on the potential negative effects of wind energy development on local communities and the local economy, including tourism and house prices	It is accepted that the text on tourism and house prices should be reviewed. However, it is not accepted that it should state more strongly that wind energy development could cause harm to the local economy. It will instead reflect the fact that there are concerns amongst some members of the Cumbrian community, particularly with regard to the issue of house prices and tourism. The potential effect on house prices is not proven, nor is it a material planning issue. A range of research has taken place to consider the effects of wind schemes on the local economy. A recent study by the Small Business Association has identified that there could be a drop in tourist numbers in areas associated with wind energy development. This study was submitted to the Government post PPS22 publication but no changes were instigated to PPS22 as a result. Studies on this issue have been limited and it is accepted that paragraph 6.34 should be revised to clearly state that there is a common perception that wind schemes could bring disbenefits to the local economy, but that there is no clear evidence that this is the case. In fact, there appears to be nothing conclusive to suggest that existing wind development in Cumbria has caused a significant negative effect to the local tourist economy. It is accepted that a balance needs to be struck that recognises that effects on the local economy is a valid planning issue that developers need to consider and that these are often raised as concerns by the local community.	Amend paragraph 6.34-6.36 "However, concerns are often raised by the local community with regard to potential adverse impacts on the local economy, and in particular the tourist economy. This accounted for 18% of total employment in 2005 and reflects Cumbria's high quality environment, landscapes and natural beauty. Concerns are often cited that any adverse impact to landscape character and visual quality could result in less people visiting Cumbria. Research is available to suggest that wind development could bring positive and negative benefits to tourism, however there is currently no evidence to suggest that the existing wind energy schemes in Cumbria, some of which have been built for a decade, have had a significant adverse economic effect on the tourist industry. When drawing up a scheme developers should consider the potential advantages and disadvantages for the local economy. An evaluation of the value of landscape character to residents and visitors should form part of a landscape character assessment." Under the new structure this becomes paragraph 2.69 Part 1.
375	67	Disagree that there is no evidence to support or counter claims on negative effects to tourism in paragraph 6.34.	It is accepted that a range of research has been carried out on the effects of wind energy development and the economy. The text will be revised to take this into account, along with a recognition of concerns amongst some members of the Cumbrian community, particularly with regard to the issue of house prices and tourism. A recent study by the Small Business Association has identified that there could be a drop in tourist numbers in areas associated with wind energy development. This study was submitted to the Government post PPS22 publication but no changes were instigated to PPS22 as a result. Studies on this issue have been limited and it is accepted that paragraph 6.34 should be revised to clearly state that there is a common perception that wind schemes could bring disbenefits to the local economy, but that there is no clear evidence that this is the case. In fact, there appears to be nothing conclusive to suggest that existing wind development in Cumbria has caused a significant negative effect to the local tourist economy. It is accepted that a balance needs to be struck that recognises that effects on the local economy is a valid planning issue that developers need to consider and that these are often raised as concerns by the local community.	Add text to the end of paragraph 6.34 "Research is available to suggest that wind development could bring positive and negative benefits to tourism, however there is currently no evidence to suggest that the existing wind energy schemes in Cumbria, some of which have been built for a decade, have had a significant adverse economic effect on the tourist industry." Under the new structure this becomes paragraph 2.69 Part 1.

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ID	Consultee ID	Comments	Response	Action
376	34, 41, 99, 113, 136	Challenge local amenity/economy text	<p>It is accepted that the text on tourism should be reviewed to reflect that although these are concerns within the Cumbrian community there is no current Government guidance on proven negative effects on tourism. No reference is made to house prices in the local amenity or economy text as it is not a relevant planning consideration.</p>	<p>Amend paragraph 6.34-6.36 "However, concerns are often raised by the local community with regard to potential adverse impacts on the local economy, and in particular the tourist economy. This accounted for 18% of total employment in 2005 and reflects Cumbria's high quality environment, landscapes and natural beauty. Concerns are often cited that any adverse impact to landscape character and visual quality could result in less people visiting Cumbria. Research is available to suggest that wind development could bring positive and negative benefits to tourism, however there is currently no evidence to suggest that the existing wind energy schemes in Cumbria, some of which have been built for a decade, have had a significant adverse economic effect on the tourist industry. When drawing up a scheme developers should consider the potential advantages and disadvantages for the local economy. An evaluation of the value of landscape character to residents and visitors should form part of a landscape character assessment." Under the new structure this becomes paragraph 2.69 Part 1.</p>
377	44, 50, 67	Take cautionary approach towards wind and strategic tourism locations	<p>It is not accepted that the guidance should take a precautionary approach towards strategic tourism locations. PPS22 advises that renewable energy developments should be accommodated where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily. The guidance seeks to highlight that tourism is an important economic activity in Cumbria and that developers need to consider the effects of a scheme on the local economy.</p>	No action required
378	16, 41	Wind development should be maximised to support the rural economy and exploit Cumbria's natural resources (wave, hydro etc).	<p>It is accepted that the role that wind energy development could have to play in the rural and urban economy could be strengthened.</p>	<p>Add to paragraph 6.34 "Within Cumbria, economic benefits could arise for both the declining manufacturing and agricultural industries. Farmers could raise income from selling or renting land to commercial developers or by providing land for a community wind energy scheme. The manufacturing industries could benefit from providing components for the construction and maintenance of schemes. This has already been the case with the first off shore scheme near Barrow." Under the new structure this becomes paragraph 2.68 Part 1.</p>

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ID	Consultee ID	Comments	Response	Action
379	44, 45, 71, 77, 78	Paragraphs 4.16, 4.20, 6.34 and 6.36 reiterate common perceptions on wind energy and effects on tourism which are not supported by evidence.	A range of research has taken place to consider the effects of wind schemes on the local economy. A recent study by the Small Business Association has identified that there could be a drop in tourist numbers in areas associated with wind energy development. This study was submitted to the Government post PPS22 publication but no changes were instigated to PPS22 as a result. Studies on this issue have been limited and it is accepted that paragraph 6.34 should be revised to clearly state that there is a common perception that wind schemes could bring disbenefits to the local economy, but that there is no clear evidence that this is the case. In fact, there appears to be nothing conclusive to suggest that existing wind development in Cumbria has caused a significant negative effect to the local tourist economy. It is accepted that a balance needs to be struck that recognises that effects on the local economy is a valid planning issue that developers need to consider and that these are often raised as concerns by the local community.	Amend paragraph 6.34-6.36 "However, concerns are often raised by the local community with regard to potential adverse impacts on the local economy, and in particular the tourist economy. This accounted for 18% of total employment in 2005 and reflects Cumbria's high quality environment, landscapes and natural beauty. Concerns are often cited that any adverse impact to landscape character and visual quality could result in less people visiting Cumbria. Research is available to suggest that wind development could bring positive and negative benefits to tourism, however there is currently no evidence to suggest that the existing wind energy schemes in Cumbria, some of which have been built for a decade, have had a significant adverse economic effect on the tourist industry. When drawing up a scheme developers should consider the potential advantages and disadvantages for the local economy. An evaluation of the value of landscape character to residents and visitors should form part of a landscape character assessment." Under the new structure this becomes paragraph 2.69 Part 1.
380	67	Delete reference to employing local labour in paragraph 6.37. It is restricted by European law and not carried out in practice.	This is not accepted. Although it is recognised that companies cannot exclude competition when contracting work etc. there is still potential for jobs to be created as a result of this type of industry and developers are encouraged to create local jobs where possible. In addition to this PPS22 highlights that consideration should be had given to the economic, environmental and social benefits that could arise from renewable energy development. For these reasons this reference will remain.	No action required
381	78	Paragraph 6.37 could refer to buyers events and envirolink.	It is accepted that this could be a useful resource for developers seeking to use local materials and labour.	Add a reference to Envirolink at the end of the Local Economy section.
382	53, 54, 64, 94, 99, 113	Public rights of way and access rights should be considered through the planning process. Mitigation and enhancement should be sought in areas surrounding wind development.	It is accepted that as part of any development consideration should be given to the effects on public rights of way/open access land. As part of the restructuring of the SPD additional text will be added on this issue. This will accord with guidance contained in the Companion Guide to PPS22.	Add "For public rights of ways care should be taken to ensure an adequate distance is provided between them and turbines. Fall over distance of a turbine is often considered an appropriate distance, but consultation with the local authority should be carried out to determine what is most appropriate on any scheme. The British Horse Society has recently issued new guidelines for bridleways that developers should take into account in any discussion." to Part 1. Under the new structure this becomes paragraph 2.58 Part 1.

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ID	Consultee ID	Comments	Response	Action
383	77, 78	Paragraph 6.42 on wind causing adverse impacts on flight safety is untrue.	It is accepted that the current text could be improved to better reflect DTI guidance. The reference to flight safety will be replaced with a reference to the use of aerodromes to accord with guidance in 'Wind energy and aviation interest: an interim guide, DTI 2002.'	Amend paragraph 6.42 "Wind energy developments may cause adverse impacts on the use of aerodromes and radar and other navigation systems used for air traffic control and aircraft instruments." Under the new structure this becomes paragraph 2.4 Part 1.
384	91	Paragraph 6.44 should refer to low flying areas to prevent collision risk.	It is accepted that the text could be strengthened to refer to the range of issues that should be addressed when dealing with wind energy development and aircraft and radar considerations.	Amend paragraph 6.44 "Currently such issues may prevent development from taking place around the north, east and some coastal locations within Cumbria due to MoD sites and aircraft activity, such as Spadeadam in the north and Warcop in the east, and Carlisle Airport. In these, and other areas, flight paths will need to be determined and consideration given to see if action can be taken to mitigate against collision risks..." Under the new structure this becomes paragraph 2.6 Part 1.
385	26	Add a 1.5km buffer distances around emergency radio transmitters to paragraph 6.41	PPS22 advises that policies should not set separation distances for wind turbines with regard to airport operation and radar and aircraft. These will be set depending on the circumstances of any proposal and its relationship to such operations and will be determined at the planning application stage. The SPD seeks to take the same approach for the purpose of radio transmitters as the nature of the interference depends on the size of the structure and the radio waves involved. Advice is provided to help developers identify any issues relating to radio transmitters. It is not accepted that buffer distances should be set out in the SPD.	No action required
386	60, 109	Challenge glossary order and definitions	It is accepted that the glossary should be presented in alphabetical order. The definitions of mitigation, landscape capacity assessment, landscape character classification, landscape sensitivity and zone of visual influence are challenged. These will be reviewed in line with the Guidelines on Landscape and Visual Impact Assessment 2nd Edition (The Landscape Institute & Institute for Environmental Management & Assessment 2002) to determine any appropriate changes.	Reorder glossary. Amend definitions to better reflect definitions in "Guidelines for Landscape and Visual Impact Assessments".
387	6	The LCA accords with findings of the neighbouring assessment in Lancashire.	Comment noted	No action required
388	30	Impressed with detail in Part 2.	Comments noted	No action required
389	67, 72, 73, 74	Support the general approach to the landscape capacity assessment and methodology.	Comment noted	No action required
390	42, 72, 73	Support landscape capacity assessment findings	Comment noted	No action required

ID	Consultee ID	Comments	Response	Action
391	60	Challenge landscape capacity definition - include word 'unacceptable' in definition	<p>This is not accepted. As stated in the SPD the chief reference should be Topic Paper 6. However definition and how the term should be used is set out in the Topic Paper at 3.4 iii) "</p> <p>describes ability to accommodate development of a specific type reflecting both the sensitivity of the landscape resource and its visual sensitivity (particularly to that type of development) and value attached to it or specific elements in it. It does not refer to significant or unacceptable effects. The SPD definition at 2.4 accords with this. At 3.3 Topic Paper 6 explains there is broad agreement that capacity is concerned with the amount of change or pressure that can be accommodated therefore there is a quantitative dimension to it that needs to reflect the idea of limits to acceptable change. Paragraph 6.5 expands on this by basically saying judgements about capacity hinge around a threshold of when effects become unacceptable or significant. The quantitative dimension to capacity is covered in the SPD at 2.26 by making judgements on a five point scale of capacity and, in line with the guidance, refers to a significance or acceptability limit. This is the same approach adopted by Land Use Consultants (co-authors of Landscape Character Assessment (LCA) guidance and contributors to Topic Paper 6) in two of their recent capacity assessments. This approach also parallels the LVIA/EIA process identifying a full range of different levels of effect then making conclusions on which are significant in planning terms. Were 'unacceptable' to be inserted into the definition, it could be interpreted as excluding all areas where significant/unacceptable adverse effects were considered to be likely ie low low/moderate capacity.</p>	No action required
392	60	Challenge landscape sensitivity definition - exclude word 'susceptible'	<p>This is accepted. As stated in the SPD the chief reference should be Topic Paper 6i. The more neutral definition in relation to development at 5.1 of this guidance referring to 'ability' is preferable. The five point scale of sensitivity indicates this ability can range from landscape being robust to vulnerable.</p>	<p>Reword sensitivity definition at 2.6 to: 'The extent to which the character and visual amenity of a landscape is able to accommodate change brought about by the introduction of wind energy development'</p>
393	60	Challenge landscape value definition - include reference to quality (condition)	<p>This is not accepted. The definition follows the Countryside Agency's Landscape Character Assessment guidance at paragraph 7.8 which does not include quality in terms of condition. It does include scenic beauty (interpreted as scenic quality in the SPD definition) which at the strategic level of this study was reflected in national designations and county landscape designations in building up a value profile. Quality in terms of condition has most relevance to general landscape guidelines/strategies particularly those addressing land management issues. With respect to wind energy capacity it is not quality/condition per se that matters but how that is manifest in terms of characteristics such as visual complexity/order. Figures 1a and b of Topic Paper 6 reinforces this interpretation and supports the SPD approach, when considering overall sensitivity (1a) landscape quality/condition in terms of intactness/state of repair of elements is listed as a factor to consider under character sensitivity but when considering capacity for a particular type of change (1b) the example given is that resulting from wind turbines, it is not listed as a factor either in sensitivity or value. None of the other similar assessments reviewed as part of developing the SPD methodology incorporated quality in terms of condition meaning intactness/state of repair in determining value. However clarification will be added to this section on the definition of value.</p>	<p>Amend Value definition "The relative importance that stakeholders attach to different landscapes based on a range of criteria that may include the following: scenic quality; rarity; the influence and presence of other conservation interests; special cultural associations; associated recreation or amenity function or perceptual aspects such as remoteness and tranquillity. Value may be formally recognised through local or national designations on the basis these criteria either individually or in combination. Alternatively or in the absence of designations there may be a long established consensus about the importance of a particular area encompassing one or more of these criteria which can be traced from views expressed by different stakeholders either nationally or locally."</p>

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394	109	The landscape capacity assessment is subjective. The author has no better opinion than elected councillors. Elected councillors views are needed to approve the SPD.	This is not accepted. The SPD has been approved for consultation purposes by a committee of elected members, and the board of the Lake District National Park Authority. These bodies will also approve the final document for adoption. Therefore views of elected councillors and board members have been taken into account. The chartered landscape architect that produced the landscape capacity assessment has over 20 years of experience in landscape matters and 15 years experience dealing with wind energy development in Cumbria. The LCA was carried out in accordance with guidance produced by the Countryside Agency and the Landscape Institute and in consultation with a range of planning professionals across Cumbria. As such it is considered its findings are broadly objective.	No action required
395	101	The landscape capacity assessment is subjective.	This is not accepted. The SPD has been approved for consultation purposes by a committee of elected members, and the board of the Lake District National Park Authority. These bodies will also approve the final document for adoption. Therefore views of elected councillors and board members have been taken into account. The chartered landscape architect that produced the landscape capacity assessment has over 20 years of experience in landscape matters and 15 years experience dealing with wind energy development in Cumbria. The LCA was carried out in accordance with guidance produced by the Countryside Agency and the Landscape Institute and in consultation with a range of planning professionals across Cumbria. As such its findings are broadly objective.	No action required

ID	Consultee ID	Comments	Response	Action
396	60	Challenge framework of sensitivity criteria/key characteristics - rationalise into 4 sets including scope for mitigation	<p>This is accepted in part. Landscape Character Assessment Topic Paper 6 (Countryside Agency and Scottish Natural Heritage, 2003) at 5.1 explains that when making sensitivity judgements 'it is essential to think in an integrated way' about the exact form and nature of the change and aspects of the landscapes likely to be affected. The approach taken in the SPD has done this recognising that the primary impact of wind energy development is the introduction of new manmade large scale vertical elements with moving parts which have visual effects on the character of the landscape and those experiencing it rather than changes to the physical elements themselves. These then translate into particular aspects likely to be affected and then criteria/key characteristics. The bullet points at 5.5 of Topic Paper 6 group these aspects into a set of 4 considerations (rather than headings for presentation of purposes). The key characteristics in the SPD might be roughly categorised as follows under the first three considerations:</p> <ul style="list-style-type: none"> - Landscape Character of Elements - Settlement, manmade influence, remoteness relevant in terms of compatibility. - Aesthetic aspects - Enclosure, scale, order, complexity, movement/tranquillity derived from the form and arrangement of characteristic elements eg landform, settlements, land cover (combined to avoid duplication and aid understanding LCA 5.13). Skyline-focal points, verticals, landmarks, connections-backdrops and views regarded as scenic dimensions (see Topic Paper 6 paragraphs 4.2 or 5.3, LCA guidance paragraph 6.33) and therefore come under aesthetics. - Potential visibility aspects - Visual interruption, settlement and key views. <p>Whilst remoteness and tranquillity is generally considered to be a perceptual aspect it is also a physical aspect, and hence it overlaps into considerations of elements and aesthetics as indicated above. The considerations are closely linked and some characteristics pertain to more than one of the 3 different considerations eg scale and enclosure will influence visibility. Topic Paper 6: Figure 1b suggests an alternative structure with just 2 broad headings - Landscape Character Sensitivity and Visual Sensitivity (ie visibility reflected by degree of screening, numbers of key receptors and scope for mitigation). At 7.4 of the topic paper, it is suggested that a record should be made of judgements made about these 2 areas as well as Value. The SPD assessment sheets conform in terms of value but do not separate landscape and visual sensitivity. The fourth consideration at 5.5 of Topic Paper 6 is scope to modify visual impacts. Due to the height and movement of wind turbines individually or in groups they will inevitably create distinctive features in the landscape and scope to mitigate this is therefore limited. However as recognised in SPD Part 1: Chapter 5 there is some scope to ensure optimum fit through composition etc. Opportunities for this sort of mitigation have been built into the assessments and reflected in the sensitivity levels. Topic Paper 6 recognises that nationally a variety of methods have been used to judge landscape character sensitivity noting at 4.3 that "each has its merits and it is not the role of this topic paper to advocate one approach or another. There is much common ground between them..." Box 5 and other similar assessments reviewed in the course of developing this assessment illustrate this variety. Land Use Consultants in their assessments for the South West Region (Box 5) and part of Norfolk did not structure key characteristics according to any headings whilst for Huntingdonshire they were grouped in the methodology and ordered in the assessments according to two headings: Landscape Character and Visual (noting complexities as above) similar to Topic Paper 6 Fig 1b. Lovejoy's assessment for Lancashire group them under 4 headings Physical (appears to cover aesthetic aspects and character of elements), Perceptual, Visual and Value. None of these refer to scope to modify visual impacts within the methodology or sensitivity assessments. The level of detail in the SPD methodology compares favourably with similar assessments in terms of length and detail. At 8.2 Topic Paper 6i notes that some methodologies can</p>	<p>The following changes are proposed. Expand methodology at 2.6-7 regarding process in arriving at criteria/key characteristics and four sets of considerations in Topic Paper 6i and split between landscape and visual factors. Add explanation of how format of assessment sheets follows this by recording judgements according to Landscape Character Sensitivity, Visual Sensitivity and Value. Review adjectives in criteria (Table 1/Appendix 1) and sensitivity assessments to ensure they convey aesthetic qualities rather than personal perceptions.</p> <p>Re-order sensitivity assessment sheets according to landscape and visual factors.</p>

ID	Consultee ID	Comments	Response	Action
397	60, 67	Challenge consistency between Landscape Sensitivity Criteria (Table 1) Key Characteristics Sensitive to Wind Energy Development (Appendix 1)	<p>become very long and complex so even experienced practitioners may struggle to understand fully the terminology, subtleties of definitions and the judgements made at each level of assessment, as well as the way factors are combined 'So although the arguments are logical, consistent and fully explained this can itself open up potentially important areas of misunderstanding.'</p>	<p>Review Appendix 1 and Table 1 for consistency, amend Appendix 1 to improve reasoning and tie back discussion to landscape character. Reconsider detail in Manmade Influence criterion/key characteristic, focus on character association and function. Add further explanation on relevance of pattern in Appendix 1. These will all be found in Part 2 under the new structure.</p>
398	72	Delete examples of attributes indicating lower sensitivity from Appendix 1	<p>This is not accepted. Conflicts with impartial approach adopted in the assessment. Table 1 and Appendix 1 set out the range of favourable and limiting landscape factors in relation to wind energy development. They provide a framework for presenting systematic and balanced sensitivity assessments for each landscape type and also act as a checklist of issues for specific schemes. Exactly where the balance lies will vary in each a case eg in landscapes of high/moderate landscape sensitivity the balance is weighed more towards limiting factors. In terms of the coastal landscapes referred to exposure, broad views, and simple ordered field patterns are favourable aspects.</p>	No action required
399	72	Challenge last example on Skyline in Appendix 1	<p>This is accepted. Inconsistent with rest of Appendix in terms of style and reference to individual development/inspector's decision. Relevance in relation to skyline unclear, relates to the effect of viewer elevation on prominence of skyline and wind turbines.</p>	Review relevance of this example. If retained make example generic and improve clarity.

ID	Consultee ID	Comments	Response	Action
400	16, 60, 72, 74, 77	Challenge inclusion of Remoteness and Tranquillity in sensitivity criteria objectivity in scoring	<p>This is accepted in part. Natural England supports the inclusion of remoteness and tranquillity as one of the key characteristics sensitive to wind energy development. Friends of the Lake District suggest reference to CPRE tranquillity work with regard to Appendix 1 and their definition as an addition to the datasets used to derive value profiles for each type. Similar assessments for parts of Norfolk, Lancashire and the South West Region (Box 5, Landscape Character Assessment Topic Paper 6, Countryside Agency and Scottish Natural Heritage 2003) all contained a Remoteness and/or Tranquillity sensitivity criterion. The Western Isles assessment (Box 2 Topic Paper 6) included remoteness/modifications/naturalness as a perceptual factor in the sensitivity criterion, a qualitative indication based on perception of a professional observer then also included it as a value criterion called 'wildness' rated according to a quantitative calculation of physical remoteness using GIS. An assessment for Huntingdonshire included it as a value criterion rather than a sensitivity criterion.</p> <p>Figure 1b of Topic Paper 6, on judging capacity for a particular type of change using wind energy development as an example, suggests it should be a factor considered (as a perceptual aspect) under landscape value. However it does list land use (cultural factor) and movement (aesthetic factor) as examples of sensitivity criteria and identifies them as being relevant to physical remoteness and tranquillity. Landscape Character Assessment Guidance (Countryside Agency and SNH 2002) para 5.14 includes remoteness and tranquillity as more subjective perceptual aspects recorded as responses in the field by professionals but notes that an element of objectivity can inform such judgements eg measurements of accessibility and absence of settlement or Tranquil Area Maps. At 7.23 it notes tranquillity is a composite feature relating to low levels of built development, traffic, noise artificial lighting. It also notes that consensus of opinion through involvement of stakeholders can play a part in judging their importance/value. This is easier to achieve at a local level eg Huntingdonshire which drew on a combination of professional responses recorded in an existing landscape assessment and stakeholder workshops and where there were no national landscape designations to inform value judgements. In conclusion there is a consensus that remoteness/tranquillity is a relevant criterion in judging landscape capacity for wind energy capacity, this is generally considered to be a perceptual (subjective response) factor but one that can be supported by objective physical evidence, whilst Topic Paper 6 advocates its consideration under value many practitioners consider it under sensitivity and base assessments of it on the responses of professional assessors, value judgements of remoteness/tranquillity can be informed stakeholder involvement or by designations. The SPD capacity assessment includes it under sensitivity as a separate criterion and value as part of the landscape designation criterion.</p>	<p>Review this criterion and findings as necessary. Ensure use of this criterion is transparent, robust defensible: a. Acknowledge extent of subjectivity involved as a perceptual aspect b. Explain inclusion under sensitivity and recognition under value.</p>

ID	Consultee ID	Comments	Response	Action
401	60, 72	Challenge inclusion of Visual Interruption in sensitivity criteria / SPG reference	<p>This is not accepted. Appendix 1 refers to the origins of this criterion in the current adopted Supplementary Planning Guidance (SPG). There was broad support and acceptance by developers of the refined Areas of Search in Technical Paper 6 which were in large part informed by visual interruption as categorised in the SPG.</p> <p>Landscape Character Assessment Topic Paper 6 (Countryside Agency and SNH 2002) advocates consideration of potential visibility as part of visual sensitivity in terms of screening/containment by landform and extent of tree cover (Fig 1b, 4.5, 5.4 and 5.5). It is not based on the assumption that wind energy development is not desirable as stated. It recognises that responses/perceptions will be mixed and some will find it acceptable and others will not. To exclude it as proposed suggests that is desirable. Distortions to overall sensitivity suggested are a matter of logic and professional judgement. A similar visual containment criterion was included in Lovejoy's Lancashire sensitivity assessment visual enclosure criterion included in Land Use Consultants South West Region (Topic Paper 6: Box 5).</p>	<p>Reword Appendix 1 to include precise definition and to remove SPG reference.</p> <p>Review findings for possible distortions as a result of distinguishing visibility criteria in the sensitivity framework.</p>
402	60	Challenge inclusion of Skyline in sensitivity criteria	<p>This is not accepted. This comment illustrates confusion between landscape and visual aspects. This criterion covers scenic dimensions and as such is an aesthetic factor. Aesthetic dimensions eg scale, enclosure, form, pattern, line, point are all experiential aspects of landscape character perceived by the visual senses (Landscape Character Assessment, Countryside Agency & SNH 2002 para 5.11(LCA)). Guidance in both the Landscape Character Assessment Topic Paper 6i (paras 4.2 and 5.3) and SNH Guidelines 2001, (para 2.3) state they can include scenic dimensions eg skyline, vistas, focal points. It is a more experiential aspect of landscape character (LCA 5.11). As such baseline character information on this criterion was readily available in the Cumbria Landscape Classification etc and analysed as part of the assessment process as set out in the methodology (paragraphs 2.17 – 20). The assessment was carried out at a county, or sub-regional level, and not at a 'regional' as level. A similar criterion was used in assessments by Land Use Consultants also entitled 'skyline', Lovejoy entitled 'settings', and the University of Newcastle entitled 'visual composition'. However due to other comments raised amendments will be made to the methodology and to criteria in Table 1 and Appendix 1.</p>	<p>Review adjectives in criteria (Table 1/Appendix 1) and sensitivity assessments to ensure they convey aesthetic qualities rather than personal perceptions. Re-order sensitivity assessment sheets according to landscape and visual factors.</p>
403	60	Challenge inclusion of Connections with Adjacent Landscapes in sensitivity criteria	<p>This is not accepted. This comment illustrates confusion between landscape and visual aspects. This criterion covers scenic dimensions and as such is an aesthetic factor. Aesthetic dimensions eg scale, enclosure, form, pattern, line, point are all experiential aspects of landscape character perceived by the visual senses (Landscape Character Assessment, Countryside Agency & SNH 2002 para 5.11(LCA)). Guidance in both the Landscape Character Assessment Topic Paper 6i (paras 4.2 and 5.3) and SNH Guidelines 2001, (para 2.3) state they can include scenic dimensions eg skyline, vistas, focal points. It is a more experiential aspect of landscape character (LCA 5.11). As such baseline character information on this criterion was readily available in the Cumbria Landscape Classification etc and analysed as part of the assessment process as set out in the methodology (paragraphs 2.17 – 20). This was complemented by classification map analysis and local knowledge/field surveys (Part 2 para 2.23). The assessment was carried out at a county, or sub-regional level, and not at a 'regional' as level. A similar criterion was used in assessments by Land Use Consultants also entitled 'Views and Connections with Adjacent Landscapes', Lovejoy entitled 'views', and University of Newcastle entitled 'physical context'. However due to other comments raised amendments will be made to the methodology and to criteria in Table 1 and Appendix 1.</p>	<p>Review adjectives in criteria (Table 1/Appendix 1) and sensitivity assessments to ensure they convey aesthetic qualities rather than personal perceptions. Re-order sensitivity assessment sheets according to landscape and visual factors.</p>

ID	Consultee ID	Comments	Response	Action
404	60, 67, 72, 81, 91	Contradictions between attributes in sensitivity criteria	<p>This is accepted in part. The complexities of capacity assessment and difficulties in achieving transparency and accessibility to a lay audience are pointed out in 8.2 – 8.3 Landscape Character Assessment Topic Paper 6 (Countryside Agency and SNH 2002). Part 2 is primarily aimed at a specialist audience whilst the summary methodology in Part 1: Chapter 3 is aimed at a wider non-specialist audience.</p> <p>Comments suggest that there is much overlap between the eight key characteristics in Table 1 with similar issues being repeated under different headings and asserts that this is due to the way the characteristics have been sub-divided. This is not accepted since there is a clear logic to how the characteristics were derived and presented.</p> <p>Overlapping inevitably occurs in assessments like this regardless of how they might be divided. For example a landscape capacity assessment carried out for Huntingdonshire identifies seven sensitivity headings, of which four fall under landscape character and three under visual, with a note that 'these headings are closely linked and interchangeable - information on scale and land cover will influence the extent that any development is visible within the landscape.' The reason for the overlaps is that physical elements or features can be relevant to more than one sensitivity, for example looking at the apparent contradiction cited in response ID 60: under the scale and enclosure sensitivity criterion a 'featureless' landscape is included as one attribute indicating lower sensitivity because the problem of turbines appearing out of scale with human scale details such as farm buildings, walls, hedges, trees etc will be avoided. However under the visual interruption sensitivity criterion the presence of these very same features 'frequent vegetative or built features' is included as one attribute indicating higher sensitivity because these features would contain visibility.</p> <p>Reference to Appendix 1 should assist in understanding these points, especially with the improvements identified for action elsewhere in this analysis. It has to be realised that both general landscape sensitivity assessments and landscape and visual impact assessments for specific schemes involve identifying a range of potential issues or effects (that might on face value appear contradictory) which need to be weighed against one another. Expert professional input is essential to both types of assessment (see Part 3: p2 and Figure 1). Appropriately experienced landscape architects are best placed to understand the subtleties and complexities entailed in the potential effects arising from this type of development as reflected in the sensitivity criteria in Table 1.</p>	<p>Add explanatory text in methodology on overlaps/subtleties and include more examples in Appendix 1 to illustrate differences.</p>

ID	Consultee ID	Comments	Response	Action
405	60, 81	Challenge framework of sensitivity ratings and relative weightings	<p>This is accepted in part. Analysis of similar assessments shows a wide range of approaches to structuring and combining sensitivity assessments from simple to complex, and short on transparency to high on transparency. For the South West Region Land Use Consultants put all 'attributes' together including character of elements, aesthetic, visual, perceptual and value aspects together and assign sensitivity levels on a five point scale. The review of this approach in Box 5 of Landscape Character Assessment Topic Paper 6 (Countryside Agency and SNH 2002) states 'The study is clearly based on professional judgement within a clear and reasonably transparent framework. There is no explicit scoring or use of matrices but rather a common sense approach to combining the nature of the landscape with the nature of the development to derive sensitivity.' For Lancashire, Lovejoy's list fourteen key characteristics under four aspect headings: physical, perceptual, visual and value, but they do not rate these individually. They only provide a combined overall sensitivity level on a five point scale. These levels are based on professional judgement and a brief summary of the main considerations justifying the judgements is presented on the assessment sheets for 102 landscape character areas. For part of Norfolk, Land Use Consultants effectively took a profile approach rating each of the eight key characteristics on a three point sensitivity scale and stating overall sensitivity on the basis of professional judgement but not by averaging/scoring as 'some characteristics maybe deemed to be so sensitive that they have an overriding influence on the overall sensitivity of the landscape'. However the overall findings generally do seem to represent at average score and where there is an exception to this the brief reasoning behind the judgements does not seem to make it clear what the overriding influence is. For Huntingdonshire, Land Use Consultants slightly refined the above approach to sensitivity ratings distinguishing between landscape and visual characteristics in the methodology, these headings are not carried forward to the assessment sheets but the order of characteristics reflects them. For the Western Isles, the University of Newcastle the sensitivity ratings are not provided on each of the criteria or key characteristics but summarised on a five point scale under three factors/headings: physical, perceptual and visibility. Later on in consideration of capacity using a profile approach physical and perceptual factors are combined into an overall landscape sensitivity level alongside visibility. Levels are based on a ranking/scoring system noting that 'These rankings and combinations treat each factor score as of the same weight or importance ie physical/perceptual/visibility equal.' It then notes that this structure builds in the flexibility to apply different weighting preferences for each factor having recognised earlier in the methodology the debate around weightings and what should take precedence between landscape sensitivity and visibility. In comparison to the above the SPD approach is considered reasonable in terms of process and transparency. Effectively it adopts a combination of a profile and scoring approach rating each of the eight key characteristics on a five point sensitivity scale and detailing the reasoning behind each of these professional judgements below each rating. An overall sensitivity level is then derived from an explicit scoring/averaging process and the balance of considerations behind this qualitative judgement are explained in a carefully considered capacity statement. The SPD assessment sheets accord with Topic Paper 6 in separating out the record of value but do not separate out landscape and visual sensitivity as suggested at Fig 1b 7.4. There is merit in doing this not only to accord with the guidance, but to structure debate as discussed above and mirror the LVIA process. However to give each of these 2 factors a rating and then derive an overall sensitivity level from these could give visual sensitivity a disproportionate weighting. The current method of combining all eight characteristic levels is preferable and effectively gives a landscape: visual weighting relationship of 3:1, which is</p>	Explain relative weightings of sensitivity criteria in methodology.

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ID	Consultee ID	Comments	Response	Action
406	60	Challenge scale of sensitivity levels	probably the opposite of the previous Supplementary Planning Guidance.	No action required.
407	60	Challenge use of Quality of Life Approach in assessing landscape value in paragraph 2.10, part 2.	This is not accepted. It accords with guidance set out in Landscape Character Assessment Topic Paper 6 (Countryside Agency and SNH 2002). The five point scale of sensitivity indicates that the ability of a landscape to accommodate change can range from it being robust to vulnerable. There needs to be some expression of the sensitivity range using a textual scale and the terms 'vulnerable' and 'robust' are commonly used even within the boxed examples of Topic Paper 6.	Amend text to clarify approach to defining landscape value described in methodology by reference to LCA guidance 7.8 7.22 Topic Paper 6 Fig 1b 6.1 - 4.
408	60	Value criteria at Table 2 should reflect definition of value	This is accepted. The designations included as a key indicator in value criteria were used in the capacity assessment; the omission of any reference to them in the definition is an oversight. These will be corrected by reference to Landscape Character Assessment guidance (Countryside Agency and SNH 2002) paragraph 7.8/21 which includes designations. Perceptual aspects such as Remoteness and Tranquillity are reflected in designations but relevant beyond, and are reflected in subjective responses in the Landscape Classification and included as part of the sensitivity analysis. Value criteria are intended to have application for both capacity assessment at a strategic level and assessment of specific schemes at a local level. Local landscape values reflected in local policy areas are not reflected in the strategic landscape capacity assessment but will be relevant to the assessment of specific schemes - they may have value because of the function they perform eg recreation, visual amenity and 'green' space valued for accessibility and local scarcity (as identified in the Landscape Institute's Guidance for Landscape and Visual Impact Assessment 2002, paragraph 2.26). Text and criteria will be reviewed accordingly.	Amend text to clarify approach to defining landscape value described in methodology by reference to LCA guidance 7.8 7.22 Topic Paper 6 Fig 1b 6.1 – 4. Review value criteria for consistency with value definition. Add explanatory note to Table 2 and Appendix 2 regarding relevance to different levels of assessment. Revise Appendix 2 to take account of higher importance indicated by some local designations.
409	77, 81	Remove LoCI from Table 2 value criteria	This is accepted. Table 2 gives extremes at each end of a range for each criterion; Landscapes of County Importance (LoCI) do not represent one of the extremes for the landscape designation value criterion.	Delete LoCI from right hand side of Table 2. This will become Table 4, Part 2.

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ID	Consultee ID	Comments	Response	Action
410	60	Consider inclusion of landscape quality (condition), perceptual aspects, representativeness in value criteria	<p>This is accepted in part. It is not accepted that landscape quality (condition) should be included for same reasons it should not be included in the definition as explained in 3 above. Landscape Character Assessment (Countryside Agency and SNH 2002) guidance (LCA) suggests representativeness may be included as a criterion in attaching status to landscapes. Whilst this criterion is reflected in AONB designations elsewhere this type of value is not distinguished within the range of county level documents (see 2.21 of the methodology) used as a baseline for this assessment.</p> <p>Therefore it has not been included as a separate criterion. The LCA and its associated Topic Paper 6 (2003) both refer to perceptual aspects in the context of value. Both the AONB and LoCI designations reflect perceptual aspects eg scenic beauty/attractiveness, tranquillity, wildness and remoteness. These sources indicate an existence of a consensus about the importance of these aspects at a national and county level that can be traced over time from views expressed by different stakeholders: primarily communities of interest (statutory bodies, local authorities, management projects voluntary bodies) but also communities of place (residents visitors). Hence perceptual aspects are included in the value criterion as part of designations. The special qualities justifying designation are also highlighted and the capacity judgements take account of their relevance to wind energy sensitivity. It is acknowledged that as stated in the LCA definition landscapes may be valued beyond formal designations. Such values could not be included in this capacity assessment for a variety of reasons: absence of any information, variability in approach and robustness of local stakeholder surveys. However they may well be relevant to assessment of specific schemes and should therefore be included in Table 2.</p>	<p>Add perceptual aspects to Table 2: Landscape Value Assessment Criteria. This will become Table 4, Part 2.</p>
411	60	Challenge methodology regarding limitations of landscape designation criterion and inclusion of local designations	<p>This is accepted in part. There are limitations to this value criterion in terms of appreciating what the recognised qualities of the designations are and considering whether they might be compromised are covered in the methodology. This is pointed out in paragraph 2.12 but is elaborated upon in the study methodology in paragraphs 2.21 and 2.26. The value criteria are intended to have application for both capacity assessment at a strategic level and assessment of specific schemes at a local level. As a result of this Appendix 2 includes reference to local designations.</p>	<p>Add a cross reference to 2.12. Review Appendix 2 to take account of higher importance indicated by some local designations.</p>
412	60	Consider inclusion of rare features and elements in assessment of value	<p>This is not accepted. There is no available information source, it is considered impractical at this level of study, and sensitivity to wind energy development relates primarily to visual effects on overall landscape character rather than elements. this issue is more relevant at a site specific level.</p>	<p>No action required.</p>

ID	Consultee ID	Comments	Response	Action
413	60	Challenge absence of scale of value and grading of landscape values	<p>This is accepted in part. An analysis of similar assessments shows a wide range of approaches to landscape value. For part of Norfolk, Land Use Consultants did not consider value in determining capacity the only reference are brief notes on presence of national designations. In the district level study of Huntingdonshire, Land Use Consultants considered value in determining capacity under 4 headings but do not grade these individually or as a whole within the assessments but in a landscape value overview describe how turbines might affect landscape values. Value information was derived from 'Human Response' sections in an existing assessment and perceptions from stakeholder workshops informing that assessment. For Lancashire, Lovejoy's include value as one of 4 aspect headings in the consideration of sensitivity. Four criteria: rarity, designated scenic quality (national/regional), cultural associations and amenity recreation are described under this heading. These are not graded either individually or in terms of overall value. Only a combined overall sensitivity level is expressed on a 5 point scale. These levels are based on professional judgement and a brief summary of the main considerations justifying the judgements is presented on the assessment sheets. In terms of value these appear to be limited to reference to the presence or setting of national designations. For the Western Isles, the University of Newcastle consider value under 4 factor headings: commonness and rarity; wildland; designations and stakeholder values (based on a postal survey of 12,000 households with a response rate of 9.8% and an existing tourist survey). Each factor is graded on a 3 point scale but they are not combined into an overall value because 'there are locations where they coincide...In other places one or other of the layers may predominate. Multiple value is one reason why landscape capacity cannot be a single quantity'. A summary of the overall evaluations of commercial landscape capacities are shown in a table, a profile is given for each landscape character type indicating grades for landscape sensitivity, visibility, 4 separate landscape values and finally landscape capacity based on an overview of the distribution of the assessments of each aspect. Each of the factors is given a similar weighting, each factor grade is added together to arrive at 'a balanced but unweighted capacity estimate'. It notes that it is possible to apply weight to factors eg high value could be regarded as of most significance, statutory designations could be given greater weight than stakeholder values, landscape sensitivity could be given greater weight than visibility because the latter is highly variable related to distance perception. Different users of the information are likely to want to apply different weights. The SPD compares favourably to these examples in terms of process and transparency. The capacity statement considers value and explains how the capacity judgement is justified in terms overall sensitivity and separate value factors. Designations can be graded fairly confidently because there is a reasonable consensus of professional opinion and examples of good practice eg DETR guidance Guidelines for GLVIA p14. Less confidence can be attached to grading of other factors because of a lack of national guidance on how to do this, examples of good practice and consensus of professional opinion. Often these other factors are reflected within the designations so duplication becomes an issue. Where there are no designations greater reliance has to be placed on these other factors and possibly perceptual aspects ideally informed by stakeholder surveys. There maybe a few existing local stakeholder surveys eg Solway Coast AONB but consistency of approach, robustness and relevance to this study would be an issue. New stakeholder survey of at a County level would be difficult especially 'communities of place' eg residents and visitors who generally relate to the landscape locally. In setting out good practice pointers the Landscape Character Assessment guidance (Countryside Agency and Scottish Natural Heritage 2002) (LCA) notes that 'stakeholder involvement is especially important at the local level and informing judgements based on landscape</p>	<p>Add further explanation about the process of assessing value and the weighting of value factors in the methodology acknowledging any limitations.</p> <p>Amend minority of capacity judgements that refer to 'overall value' so individual value factors are distinguished separately in order to improve transparency.</p>

ID	Consultee ID	Comments	Response	Action	
	414	77, 81	<p>Challenge use of Landscapes of County Importance (LoCIs) other local designations as an indicator of value - unlikely to survive into LDFs / boundaries crudely drawn</p>	<p>character'. The main baseline is the Cumbria Landscape Classification (1995) which is at a county level rather than local district level. This was produced prior to the LCA guidance and did not have stakeholder involvement but was based on professional judgement. However the classification underpinned the subsequent Landscape Strategy (1998) which was developed by the county council in partnership with numerous 'communities of interest' culminating in the establishment of the Cumbria Landscape Group. The classification has therefore been widely discussed and accepted by a variety of agencies. In light of the above the SPD currently takes a pragmatic approach building in designation values to capacity judgements and making adjustments where other factors are significant. It also builds in the subtlety of identifying considering to what extent recognised qualities of designations might be compromised (2.26), reflecting PPS 22 guidance para. 11 and Landscape Character Assessment Topic Paper 6 para. 6.2 (Countryside Agency and Scottish Natural Heritage 2003). It is accepted that this approach has lapsed in judgements for a minority of landscape types where value has been expressed in 'overall' terms and this need to be addressed.</p>	No action required.
	415	95	Challenge rarity scale	<p>This is not accepted. Rarity is a value layer based on the relative area of landscape character sub-types. As indicated in Part 2: Appendix 2 a five point textual scale is defined by reference to percentage bands. The scale was derived by ranking the sub-types by size and looking at the distribution of size according to rank. This produces a rank-size curve rising gently at first from the unique end of the scale with small differences in size, to steep at the common end with large differences in size. It appears to be consistent with the approach taken in a similar assessment for the Western Isles and reflects text on subjective impressions recorded in the Cumbria Landscape Classification.</p>	No action required.

ID	Consultee ID	Comments	Response	Action
416	101	Challenge landscape value criteria on grounds of no community input	<p>This is not accepted. The criteria used in the landscape capacity assessment is based on current national best practice set out by Countryside Agency and compares favourably with similar studies prepared for other planning authorities. None of these mention the involvement of communities in actually deriving the value criteria.</p> <p>However involvement of stakeholders in determining relative landscape value under criteria such as perceptual aspects is advocated alongside existence of a consensus about importance. By reference to designations, particularly the well established Landscapes of County Importance, and use of the Cumbria Landscape Classification (1995) the capacity assessment has gone as far as possible in this respect. Local involvement of communities of place was not considered appropriate or feasible to a strategic level such as this.</p>	No action required.

ID	Consultee ID	Comments	Response	Action
417	14, 25, 35, 61, 64	Challenge weighting of ecology criteria, consistency of designation coverage consideration of species protected under European law	<p>This is accepted in part. Part 2 is a Landscape Capacity Assessment and it does not purport to be anything else. National guidance in the Landscape Character Assessment guidance (LCA) (Countryside Agency and SNH 2002) paragraphs 7.8 - 7.22 and related Topic Paper 6 (2003) paragraph 6.4 indicate that even where formal landscape designations are absent judgements about landscape value can be made in terms of the relative value attached by different communities of interest based on a range of criteria including: the presence and influence of other conservation interests such as wildlife. At 7.22 the LCA states that these 'can add value to the landscape as well as having value in their own right'. Hence it is not the pure scientific value of wildlife interests being recognised here but the importance of their influence (primarily visual sometimes noise) on landscape character. Hence an ecological capacity assessment for wind energy development would be a separate exercise requiring the development of ecological sensitivity and value criteria (specific to wind energy). Similar to landscape (Part 2: paragraph 2.12) the presence of an ecological designation would not automatically indicate high sensitivity to wind energy development ie the values may not be compromised by that form of development. Landscape and ecological capacity levels might coincide in places but in others they may not.</p> <p>The only value factor to be presently assigned a separate grade is designations where there is a reasonable consensus of professional opinion and examples of good practice. Less confidence can be attached to grading of other factors because of a lack of national guidance on how to do this, examples of good practice and consensus of professional opinion. Often these other factors are reflected within the designations so duplication becomes an issue. Hence a pragmatic approach is taken building in designation values to capacity judgements and making adjustments where other factors such as ecological interest are significant (ie strong association). This is based on a professional judgement using information about ecological designations obtained from the county's GIS (see Part2: Appendix 3) and descriptions in JSP: Technical Paper 5 (2003). The former were selected on the basis of strategic importance and availability in agreement with the client. Appendix 3 of the latter states that the descriptions refer to designations, the only ones additional to those obtained from the GIS analysis were County Wildlife Sites and Special Roadside Verges. However in practice the descriptions did not refer to designations, they mainly concentrated on habitats although some species are included 'where they significantly enhance the ecological descriptions'. Hence consistency in the SPD Part 2 may be limited by the quality of the baseline information which was assumed to be reasonably robust. It is accepted that new information has come to light eg hen harriers since Technical Paper 5 was produced in 2003 and the landscape capacity assessments were undertaken in 2005. Text will be added to the biodiversity section in Part 1 highlighting this and information will be reviewed on species.</p>	Add further explanation about the process of assessing value and the weighting of value factors in the methodology acknowledging any limitations. Review information on species
418	42	Add more on protection of RIGS sites	This is accepted in part. The value of these is recognised in the capacity assessment under Geology and/or Geomorphology sections. Value criteria in Part 2: Table 2 also reflects this and as explained at Part2: 1.5 it is envisaged that these will also serve as a checklist for site specific survey and assessment. Such issues would be taken into account at a site specific level and a reference will be added to Table 2 to acknowledge this.	Add explanatory note to Table 2 and Appendix 2 regarding relevance to different levels of assessment. Table 2 becomes table 4 under the revised structure.

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ID	Consultee ID	Comments	Response	Action
419	103	Add more on historic landscape characterisation in the Description of Landscape resource.	This is not accepted. The Historic Landscape Characterisation work is not complete for the whole of Cumbria and was not available when the landscape capacity assessment was carried out. However, the landscape capacity assessment took into account the information already available in the Cumbria Landscape Classification 1994 on historic associations. It is expected that the Historic Landscape Characterisation work will be completed in 2007 and be made available in a format that should assist developers when assessing the landscape effects of future schemes. Reference to this will be added to the cultural heritage section in Part 1.	Add reference in Cultural Heritage section, Part 1.
420	81	Outdated examples in Table 3	This is accepted. Examples need to represent third generation schemes: turbines of 95 – 120m installed capacity 1.3 – 3MW in accordance with previous paragraph Part2: 2.15.	Delete reference to Lowca Kirkby Moor, and replace with reference to Brownrigg Hall: Allonby, Fairfield Farm, Pica High Pow, Wigton as small group examples and Warwick Hall, Aspatria as a large group example.
421	60	Challenge transparency of capacity judgements	This is accepted in part for reasons expressed in responses on challenges to the sensitivity framework, and the absence of a scale of value also raised by this consultee. It is accepted that there needs to be a balance between the reasoned arguments set out in the landscape capacity statements expressing the nature of the sensitivities and the values and level profiles that may mask subtleties in the overall judgements.	The following changes are proposed. Expand methodology at 2.6-7 regarding process in arriving at criteria/key characteristics and four sets of considerations in Topic Paper 6i and split between landscape and visual factors. Add explanation of how format of assessment sheets follows this by recording judgements according to Landscape Character Sensitivity, Visual Sensitivity and Value. Re-order sensitivity assessment sheets according to landscape and visual factors. Explain relative weightings of sensitivity criteria in methodology. Add further explanation about the process of assessing value and the weighting of value factors in the methodology acknowledging any limitations. Amend minority of capacity judgements that refer to 'overall value' so individual value factors are distinguished separately in order to improve transparency.
422	60	Challenge definitions of levels of capacity - insert 'unacceptable'	This is accepted in part. It is not accepted that the effects of wind energy development are not almost always significant in planning terms. As set out in the SPD it depends on the magnitude of effects and sensitivity and value of an area. Generally environmental impact assessments will identify effects that have moderate/major or major effects. These are considered significant in planning terms and unacceptable if they are moderate/major or major adverse effects. It is accepted, for the purpose of clarity, that reference should be made to 'significant adverse effects' in the text.	Reword definitions 'significant adverse landscape effects'.
423	60	Challenge clarity of process determining appropriate scale of development	This is accepted in part. The process is explained in the methodology in Part 2, paragraph 2.24 and it is accepted that a slight adjustment in wording to match the exact heading of key characteristics may assist. It is also referred to at paragraph 2.27. For each landscape type the sensitivity analysis and the capacity statements provide the reasoning behind the judgements used to determine the appropriate scale of development.	Reword and add further explanation to paragraph 2.24. Review all types with regard to the clarity of scale explanation and consistency with the landscape capacity summary table. This will move from Table 2, Part 1 to Table 1, Part 2.

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ID	Consultee ID	Comments	Response	Action
424	22, 77, 81	Challenge reference to one development per landscape type	<p>It is accepted that the text is ambiguous on how the capacity assessment relates to different sub types and geographical areas. This statement is intended to explain the capacity expressed for each type and indicates its ability in principle to accommodate a certain scale of development, but also guards against interpretation that it in any way indicates cumulative capacity. As Part 1: Chapter 4 explains determining cumulative capacity can only be undertaken on a case by case basis at the time of any planning application. Spatial extent and geographical distribution of each type will also influence scope for multiple developments. Spatial extent determines capacity in a physical sense (space available) and is very different to rarity which is based on the relative sizes of landscape types or sub-types. The text should be revised to provide clarification on this matter.</p>	<p>Amend paragraph 3.18 "...This doesn't necessarily mean that only one more development would be acceptable in each landscape character type. It indicates the scale of development that might be suitable; however whether or not a scheme is acceptable on any given site would be determined by a full landscape and visual impact assessment and consideration of any cumulative effects. If cumulative effects are likely an assessment should follow the guidance set out in section 3 to determine if the proposal is acceptable..." Under the new structure this becomes paragraph 1.16 Part 2.</p>

ID	Consultee ID	Comments	Response	Action
425	1, 60, 67, 77, 81, 87, 121	Challenge generalisation of sensitivity, value and capacity gradings and why landscape sub types were not used to take into account wider variations in landscape across the county. subdivide types where variations occur	<p>This is accepted in part. The strategic scale that the landscape capacity assessment was carried out at reflects guidance in the Landscape Character Assessment (Countryside Agency and SNH 2002) (LCA). In Chapter 2 the good practice pointers highlight the need to 'Determine the appropriate level in the hierarchy (levels of landscape characterisation) which will suit the application of the work and will provide the right scale and level of detail of information. Relate the findings to other levels in the hierarchy where appropriate'. As explained in paragraph 2.17, Part 2 of the SPD, the grain of the approach to this study is at a landscape type level reflecting the strategic nature of the assessment and the scale of development being considered. Wind turbines of up to 120m can have a wide ranging visual influence and developments are likely to affect not only the receiving landscape sub-type but also neighbouring sub-types and types. In Cumbria landscape types and sub-types are often found in tight sequences or an interwoven pattern. The need to consider neighbouring landscapes and inter-relationships between them is stressed throughout the SPD (Part 1: 3.19 Part 3 page 8). Experience in reviewing environmental impact assessments indicates that developers often focus in on the detail of individual sub-type(s) actually receiving the development, in some cases ignoring or under valuing the effect of a scheme on neighbouring sub-types or types and their inter-relationships/connections as part of a broad setting. A landscape type level approach to the capacity assessment assists in addressing this issue. Variations in sensitivity and value between sub-types was recognised early on as an issue and this formed one of the considerations of a pilot exercise that was carried out for landscape Types 3 and 5. This is described at paragraph 2.1. It was concluded that any such variations would not generally make a significant difference to the overall indicative capacity level of each landscape type ie were relatively homogenous in terms of landscape characteristics sensitive to wind energy development and value. However it was decided that wherever possible detailed variations between sub-types should be identified to assist site selection considerations at a more local level. In the sensitivity assessment sheets sub-type variations are indicated in parenthesis, and similarly for associated value factors of ecology etc. Descriptions for designation and rarity value factors also refer to sub-types and geographical variations are also picked out. The capacity statements provide pointers to the areas of greatest and least potential. Often variations are not sub-type specific but occur within sub-types eg Type 5 Enclosure localised geographical variation in undulating to rolling terrain cuts across all the sub-types hence none have been picked out in parenthesis. A significant sub-type variation was also addressed in picking out urban fringe sub-types 2d and 5d and considering them under Type 14 because of obvious distinctions relevant to almost all of the sensitivity criteria. Analysis of similar studies shows a wide range of approaches to the grain of assessments. For the NW part of Norfolk, Land Use Consultants guidance described as strategic uses a framework of 14 landscape types similar to the SPD, but does not pick out local variations. For Lancashire, Lovejoy's guidance also described as strategic uses a framework of 102 landscape character areas (LCAs), that sit under 21 landscape types. Analysis of the findings indicates that within 14 of these types there was no LCA sensitivity variation. In 5 there was relatively small variation (difference of 1 level on a 5 point scale) to the Moorland Plateaux and Hills, Undulating Lowland Farmland (for these lower levels seem to reflect position outside AONB) Farmed Ridges, Reservoir and Valleys. In 2 remaining types there was a more significant variation (difference of 2 levels): Moorland Fringe (lower levels all outside AONB and towards south Lancashire towns) and Industrial Foothills and Valleys. With regard to the landscape types spanning the Cumbria /Lancashire border and having more than one landscape character assessment there are no variations in sensitivity.</p>	Expand explanation of grain of approach and how variations are addressed in methodology in line with the adjacent reasoning. Amend reference to Landscape Type 9 with regard to significant variations in landscape character and capacity.

ID	Consultee ID	Comments	Response	Action
			<p>These correspond to Cumbria Types 1 Estuary and Marsh, 7 Drumlins 8 Main Valleys. In conclusion differences in grain of approach and variations is not a major issue with regard to overall capacity levels, variations have been dealt with under the SPD by identifying sub-type and geographical variations across the county on the assessment sheets and by separation into a different types (14) when the variation was more significant. The capacity assessment sheets and statements also highlight localised geographical variations in the context of the balance between factors favouring or limiting development. Consultation responses, analysis of the Lancashire study and analysis of the assessment sheets indicate that there are only significant variations with regard to Type 9: Intermediate Moorland. These are differences are more pronounced due to the distinct geographic areas that these sub types can be found in. As a result a distinction will be made in the adoption document for the landscape character of these sub types only. The indicative nature of the capacity assessments and need for site specific landscape and visual assessments is already highlighted at Part 2: 1.6 Part 1: 3.3.</p>	
426	60	Graphically indicate areas of greatest and least potential and particular designation setting sensitivities	<p>This is not accepted. The former comments relate to localised geographic variations that can be found in landscape sub types. The landscape capacity assessment takes a strategic view on landscape character types but identifies differences in sensitivity and value to reflect more local level variations. This information is recorded on the sensitivity analysis and in the capacity justification text and should be used when determining siting considerations at a scheme specific level. The latter comment is seeking for an expression of the potential for significant effect. However, this needs to recognise that the effect of designation sensitivities will be dependent on the precise relationship between any proposed development and the designation as determined by the scale of a proposal, visual influence in relation to the designation, local screening, key receptors etc. The assessment for the Western Isles, by the University of Newcastle, notes at paragraph 6.4 that SNH in their policy statement on wind farms (SNH,2002b) has defined a zone within 10km of the boundary of a NSA as an area of sensitivity to wind farm development'. This does not appear to be the same as a 'buffer zone' in the sense of preventing development and which PPS22 (para.14) prohibits. National designations are shown on Map 3. Part 1: and paragraph 3.19 suggest that developers should consider the landscape capacity of neighbouring landscape types and the effect of a proposal within an area of 12km of a site.</p>	<p>Add note on relevance of localised geographic variations to siting considerations at scheme specific level and explanation re setting sensitivities to methodology. Add Hadrian's Wall WHS and Heritage Coast to Maps.</p>

ID	Consultee ID	Comments	Response	Action
427	45	Challenge findings in relation to Types 1 and 2 - sensitivity overstated and there is a need to highlight the broad brush nature of the assessment.	This is not accepted. The response refers to Type 2 Coastal Limestone which is assessed as having a low/moderate capacity. As this landscape type does not exist, it is assumed that this is an error and the comment is referring to Type 2 Coastal Margins. This covers sub-types 2a, b, and c. It is agreed that manmade structures, such as masts and industrial structures, are present. It is accepted that there is a valid argument that wind turbines might positively associate with these in terms of character and function at a local level. This is reflected in the sensitivity criteria Table 1, Part 2 (Manmade Influence). However, aesthetically they may also raise issues of compatibility of form and visual separation (Skyline) and in terms of general absence of large scale modern development (Remoteness and Tranquillity). These are also reflected in the sensitivity criteria. Their presence is indicated in the Type 2 sensitivity assessment under Manmade Influence but appropriately noted as occasional. Hence they represent localised geographical variations likely to be relevant at a site specific level. Similarly they are also noted in the assessment of Type 1 in terms of isolated structures visible around the coastal margins. The derelict hinterlands referred to in the response are assumed to be those around Silloth in relation to the Solway, and around Haverigg, Millom and Askam in relation to the Duddon. Here manmade influence is more dominant and is sufficient to have warranted a separate sub-type known as 2d Coastal Urban Fringe. This was picked out as part of a pilot study to the landscape capacity assessment along with 5d and urban areas as an exceptional variation requiring separate consideration under a new Type 14 because of obvious distinctions relevant to almost all of the wind energy sensitivity criteria. The capacity of Type 14 was assessed to be moderate. Their influence on capacity on a particular proposal would be addressed by the need to take account of the capacity of neighbouring types as highlighted in Part 1: paragraph 3.19. The indicative nature of the capacity assessments and need for site specific landscape and visual assessments is already highlighted at Part 2: 1.6 and Part 1: 3.3.	No action required. Maps 3 and 4 to be revised to clarify that sub types 2d and 5d fall within Type 14 - urban areas and urban fringe.
428	103	Add reference to Paul Nash in Cultural Association section of Type 1	This is accepted. Fits criteria ie association between Arnside / Silverdale AONB artist	Add reference in value profile
429	72	Add further view details to particular sensitivities section of Type 1	This is accepted. The suggested additions of 'uninterrupted views across to Scotland' and 'views from to the Furness Fells' are relevant in terms of contribution to a recognised quality of the Solway Coast AONB and visibility of the Lake District National Park respectively. Additional text is also needed to highlight specific key receptors with regard to the Lake District National Park.	Add additional details on views to Type 1 capacity statement as set out here.
430	103	Add detail on Sandscale Haws in particular botanical richness amphibians to Type 2	This is not accepted. This level of information is considered too detailed for a strategic landscape capacity assessment and botanical richness is already generally covered in the associated ecology section under value.	No action required
431	103	Add reference to nature conservation designations across southern estuaries in particular sensitivities section of Type 2	This is accepted in part. There is a need to explain the role of ecological value in the value part of the landscape capacity assessment. However, it is not considered appropriate to include a reference to the nature conservation designation as part of the sensitivity analysis. References are identified in the Value table for landscape character Type 2.	Add explanation on origins and approach to particular sensitivity assessments within methodology.

ID	Consultee ID	Comments	Response	Action
432	64	Challenge coverage of wildlife designations and conservation interest land holdings for Type 3	This is not accepted. As explained in Part 2: paragraph 2.21, the baseline information for associated ecological interests were primarily based on Technical Paper 5, the original Cumbria Landscape Classification and the extent of designated conservation interests held on the county's geographic information system. The quality of the SPD descriptions is limited to the quality and limitations of these baseline information sources. Comparing the response description of designations (sub-type 3b in Arnside and Silverdale AONB) with these sources it appears that Biological Heritage Sites, Local Nature Reserves and Ramsar sites were not expressly identified in the original assessment. However it is considered that the addition of these to the assessment would not make a difference to the capacity level rating for Type 3, as this is already low. This in part reflects the strong ecological association. It is also worth noting that other international and national ecological designations did form part of the landscape capacity assessment, including Sites of Special Scientific Interest, protected limestone pavements and Special Areas of Conservation and were identified as 'extensive designations in 3b AONB'. The GIS indicates an national nature reserve on the Lancashire side of the AONB and a Special Protection Area within Type 1 and not Type 3. In accordance with guidance in the Landscape Character Assessment Topic Paper 6 (Countryside Agency/Scottish Natural Heritage 2003) land holding/ownership is not picked out as a criterion in terms of either sensitivity or value. Obviously the influence of ownership is likely to be manifest in the sensitivity characteristics such as Complexity and Order and Manmade Influence as well as associated interests.	No action required
433	103	Coastal cliff south of Whitehaven should be considered under Type 4 not Type 14	This is accepted in part. This relates to a landscape classification issue in this area which was addressed in 2002/3 as part of the Joint Structure Plan County Landscape review. This involved a site survey, assessment and consultation with local planning authorities. The review areas in relation to Whitehaven were identified as C1/1 and C1/2. The Copeland Local Plan Enquiry also confirmed that this area of land was not part of the urban area. The landscape classification base maps need to be amended in accordance with these findings. Part of the cliff landscape north of the Heritage Coast is already part of Type 4 and designated as a LoCI and no change is required to this.	Amend the baseline maps of the landscape character assessment and landscape capacity assessment in accordance with Technical Paper 5 (2003) and the recent findings of the Copeland Local Plan Inquiry.
434	103	Refer to cliffs north of Heritage Coast as both intrinsically and part of setting of St Bees Head and add particular sensitivities section to Type 4	This is accepted. To be consistent with approach to setting of other national designations.	Expand Type 4 Capacity Statement accordingly
435	60	Urban fringe sub-type 5d not mentioned in Part 2 but shown on maps in Part 1	This is accepted in part. It is mentioned at 2.17 of the methodology and listed along with 2d on the assessment sheet for Landscape Type 14. However, it was not reflected on the maps produced and this will be rectified.	Add '(5d and 2d)' after urban fringe types at 2.17 Maps 3 and 4 to be revised to clarify that sub types 2d and 5d fall within Type 14 urban areas and urban fringe.

ID	Consultee ID	Comments	Response	Action
436	60	Wide variations in sensitivity, value and capacity need to subdivide Type 5	This is not accepted. Sensitivity variations are generally not sub-type specific but occur within sub-types eg Type 5 - the Enclosure variation in undulating to rolling terrain cuts across all the sub-types hence none have been picked out in parenthesis. Detailed local variations in character eg valley or ridge top, cannot be reflected in this strategic level guidance. They will need to be investigated in relation to individual proposals and the capacity statements provide pointers towards suitable locations. It is not accepted that the landscape capacity assessment does not take into account the wide variations found in landscape character type 5. There are no such wide variations from the overall capacity find of moderate. the consultee infers that the capacity for type 5 actually ranges from low to high, however this has been concluded by the consultee by quoting bits of the statement out of context: low: 'small area of lowland that falls within the Solway Coast AONB designation' to high: 'greatest potential occurs in the open flatter areas broad ridge tops'. The former is a small area which is noted and justified as an exception. The latter is part of a balanced discussion of pros and cons/detailed siting considerations, it relates to one sensitivity (enclosure) and a detailed topographic variation that cuts across all the sub-types. Such level of detail would be only picked out by extremely detailed sub-division which is inappropriate to strategic guidance. As stated above, this degree of detail would be determined on a site by site basis.	No action required

ID	Consultee ID	Comments	Response	Action
437	60	Challenge origin of 'overall' value in levels in capacity statements eg Type 5	<p>This is accepted. An analysis of similar assessments shows a wide range of approaches to landscape value. For Lancashire, Lovejoy's assessment includes value as one of 4 aspect headings in the consideration of sensitivity. Four criteria: rarity, designated scenic quality (national/regional), cultural associations and amenity recreation are described under this heading. These are not graded either individually or in terms of overall value. Only a combined overall sensitivity level is expressed on a 5 point scale. These levels are based on professional judgement and a brief summary of the main considerations justifying the judgements is presented on the assessment sheets. In terms of value these appear to be limited to reference to the presence or setting of national designations. For the Western Isles, the University of Newcastle consider value under 4 factor headings: commonness and rarity; wildland; designations and stakeholder values (based on a postal survey of 12,000 households with a response rate of 9.8% and an existing tourist survey). Each factor is graded on a 3 point scale but they are not combined into an overall value because 'there are locations where they coincide...In other places one or other of the layers may predominate. Multiple value is one reason why landscape capacity cannot be a single quantity'. A summary of the overall evaluations of commercial landscape capacities are shown in a table, a profile is given for each landscape character type indicating grades for landscape sensitivity, visibility, 4 separate landscape values and finally landscape capacity based on an overview of the distribution of the assessments of each aspect. Each of the factors is given a similar weighting, each factor grade is added together to arrive at 'a balanced but unweighted capacity estimate'. It notes that it is possible to apply weight to factors eg high value could be regarded as of most significance, statutory designations could be given greater weight than stakeholder values, landscape sensitivity could be given greater weight than visibility because the latter is highly variable related to distance perception. Different users of the information are likely to want to apply different weights. The SPD compares favourably to these examples in terms of process and transparency. The capacity statement considers value and explains how the capacity judgement is justified in terms overall sensitivity and separate value factors. Designations can be graded fairly confidently because there is a reasonable consensus of professional opinion and examples of good practice eg DETR guidance Guidelines for GLVIA p14. Less confidence can be attached to grading of other factors because of a lack of national guidance on how to do this, examples of good practice and consensus of professional opinion. Often these other factors are reflected within the designations so duplication becomes an issue. Where there are no designations greater reliance has to be placed on these other factors and possibly perceptual aspects ideally informed by stakeholder surveys. There maybe a few existing local stakeholder surveys eg Solway Coast AONB but consistency of approach, robustness and relevance to this study would be an issue. New stakeholder survey of at a County level would be difficult especially 'communities of place' eg residents and visitors who generally relate to the landscape locally. In setting out good practice pointers the Landscape Character Assessment guidance (Countryside Agency and Scottish Natural Heritage 2002) (LCA) notes that 'stakeholder involvement is especially important at the local level and informing judgements based on landscape character'. The main baseline is the Cumbria Landscape Classification (1995) which is at a county level rather than local district level. This was produced prior to the LCA guidance and did not have stakeholder involvement but was based on professional judgement. However the classification underpinned the subsequent Landscape Strategy (1998) which was developed by the county council in partnership with numerous 'communities of interest' culminating in the establishment of the Cumbria Landscape Group. The classification has therefore been widely discussed and</p>	<p>Add further explanation about the process of assessing value and the weighting of value factors in the methodology acknowledging any limitations.</p> <p>Amend minority of capacity judgements that refer to 'overall value' so individual value factors are distinguished separately in order to improve transparency.</p>

ID	Consultee ID	Comments	Response	Action
		Challenge judgement explanation of appropriate scale of development eg Type 5	accepted by a variety of agencies. In light of the above the SPD currently takes a pragmatic approach building in designation values to capacity judgements and making adjustments where other factors are significant. It also builds in the subtlety of identifying considering to what extent recognised qualities of designations might be compromised (2.26), reflecting PPS 22 guidance para. 11 and Landscape Character Assessment Topic Paper 6 para. 6.2 (Countryside Agency and Scottish Natural Heritage 2003). It is accepted that this approach has lapsed in judgements for a minority of landscape types where value has been expressed in 'overall' terms and these need to be broken down into separate value factors.	Rework and add further explanation to paragraph 2.24. Review all types with regard to the clarity of scale explanation and consistency with the landscape capacity summary table. This will move from Table 2, Part 1 to Table 1, Part 2.
438	60	Add reference to Sizergh in the Connections and Adjacent Landscapes section of Type 7	This is not accepted. Detailed reference to a specific historic site in this section is inappropriate. Sizergh is mentioned as a Registered Historic Park and Garden in the capacity assessment to landscape character Type 3. As the SPD sets out the need for developers to take account of the capacity of neighbouring landscapes, this area should be considered by any proposal put forward in the neighbouring Type 7 character area (Part 1: 3.19 Part 3 page 8).	No action required
439	103	Refer to Acorn Bank and Crowdale Beck in Cultural and Ecology section of Type 8	This is not accepted. Detailed reference to these sites is inappropriate in these sections as these interests already covered generally. Acorn Bank is not a Registered Historic Park and Garden. The associations with Knights Templar and writer are also considered too detailed. Information at this level of detail would be more relevant at site specific level.	No action required

ID	Consultee ID	Comments	Response	Action
441	18, 25, 35 38, 61, 67, 83, 85, 101, 121	Challenge Type 9 capacity development scale findings given variation in character/sensitivity, value, wildlife association, setting of national designations	<p>This is accepted in part. It is accepted that the medium/high value reflected through the Landscapes of County Importance (LoCI) found in landscape character sub types 9d and parts of 9a and b might indicate some reduction in capacity when combined with the low/moderate sensitivity score. Geographical and sub-type variations in landscape character suggest there might also be variation in sensitivity, however this might only be found at a local detailed scale, for example plateau edges. Variations in scope for development may also be linked to spatial extent of a landscape character area rather than just its landscape character. This is highlighted in paragraph 6.4 of the Lancashire County Council landscape capacity assessment whereby the extent of the opportunity for wind energy development will be restricted by the extent of the geographical landscape unit in question. Whilst a discrete geographical area of Type 9 may potentially, from considerations of landscape sensitivity and value, offer medium/high capacity where the extent of that unit is limited scope for development may be further limited or removed all together. The landscape capacity findings in the SPD indicate a medium/high capacity. They do not indicate that any area of Type 9 has high capacity to accommodate wind energy development as suggested by consultees 18, 35 and 101. The area of sub-type 9b in Eden is not designated as a LoCI nor do the recognised qualities of that designation apply as suggested by response ID 18. The A66 corridor between Penrith and Appleby is assessed as having low/moderate capacity as part of Type 8 rather than 'moderate to high' as suggested in response ID 101. The landscape capacity statement and sensitivity assessments under Scale and Enclosure and Settlement indicate that small groups would be an appropriate scale of development in 9b Rolling Farmland and Heath rather than large groups as suggested in response IDs 18 and 121. However these responses suggest there is a need to clarify these points, particularly if Table 2, Part 1 is read in isolation to the full landscape capacity assessment. Consultee IDs 18 and 85 refer to the setting of nationally designated areas. However the assessment cannot attach higher value due to setting criterion, thereby effectively reducing landscape capacity, as this would be contrary to the spirit of PPS 22 (paragraph 14) which advises against the creation of 'buffer zones' around such areas application of policies that prevent the development of renewable energy projects. However the capacity statements highlight setting sensitivities that need to be considered at a site specific level. The actual effects of a proposal will be dependent on the precise relationship between it and a designated area. Potential harm cannot be assumed at a strategic level. The issues of limited spatial extent of landscape units and settings to international or nationally designated areas are also addressed by the need to take account of the capacity of neighbouring types. This is highlighted already in the SPD, paragraph 3.19, Part 1. However as part of the restructure of the SPD to provide a more balanced approach to all planning issues this information will move to Part 2. Part 2 will provide detailed information on landscape and visual effects, the landscape capacity assessment and guidance on carrying out a landscape and visual impact assessment. Consultee IDs 25 and 35 refer to the importance of rush pasture in sub-types 9a and 9d in Copeland land Allerdale in supporting an internationally important population of hen harriers (a bird of high conservation value) as winter roosting and foraging ground, which has come to light since 2005 and the landscape capacity assessment should be reconsidered. They also challenge the transparency and weighting of ecology aspects. Part 2: paragraph 2.21 explains that associated ecological interests were primarily based on Technical Paper No. 5 and the methodology for this notes that the ecological descriptions are based on summaries of the key biodiversity interests. Designations and Cumbria BAP habitats within each Type and sub-type are listed in Appendix 3. Cumbria BAP species are not listed in this appendix, but the introduction notes that</p>	<p>Review of landscape character Type 9 with regard to significant variations and new information on ecological value regarding hen harriers in rush pastures in West Cumbria (9a and d) resulted in dividing it into two groupings based on consistency of character, and specifically the key sensitivities in relation to wind energy development. Highlight spatial extent, setting issues and clarification of conservation interest as a landscape value criterion in Part 2 methodology and amend paragraph 2.24. Review all types with regard to the clarity of scale explanation and consistency with the landscape capacity summary table. This will move from Table 2, Part 1 to Table 1, Part 2. Highlight the need to take account of neighbouring landscapes in Part 2: Introduction. Update description of associated ecology in value profile to include reference to rush pastures in West Cumbria (9a and d) supporting hen harriers.</p>

ID	Consultee ID	Comments	Response	Action
442	77, 81, 83, 89	Challenge objectivity and scoring of sensitivity criteria, and in particular for Remoteness and Tranquillity, Manmade Influence and consequently overall capacity for Type 12	<p>some species have been included in the main text where they significantly enhance the ecological descriptions. Whilst rush pasture and other bird species are noted in descriptions for 9a and 9d hen harriers are not noted. It is accepted there is a case to update the descriptions in the SPD. It is not accepted that the landscape capacity findings for the area of 9a and 9c should be reviewed on the basis of technical restrictions to developing a scheme in that area arising from the proximity of RAF Spadeadam. The assessment properly considers issues relating to landscape character only. In addition to this PPS22 clearly states that guidance should not preclude future development on the basis of technical or feasibility grounds.</p>	<p>Expand explanation of grain of approach and how variations are addressed in the methodology. Review the Remoteness and Tranquillity criterion and findings. Ensure use of this criterion is transparent, robust defensible:</p> <ul style="list-style-type: none"> a. Acknowledge extent of subjectivity involved as a perceptual aspect b. Explain inclusion under sensitivity recognition under value
443	89	Who determines what is bland in type 12?	<p>This judgement will be made by the local planning authority when assessing the landscape characteristics of a site and locality when a proposal is submitted. Where required specialist advice would be sought by the local planning authority to assist in making a judgement.</p>	No action required

ID	Consultee ID	Comments	Response	Action
444	101	Challenge low /moderate capacity finding for Type 12 - Crosby Fell to North Pennines deserves low capacity	This is not accepted. Core moorland areas within landscape character sub type 12d are considered to be of high sensitivity in terms of criteria such as Complexity and Order and Skyline, but it needs to be recognised that these represent a localised geographical variation in the same way that the M6 corridor (also within sub-type 12d) does also. As such these sensitivities are highlighted in the capacity statement: 'protection of uncluttered and distinctive skylines' and 'core areas that exhibit attractive limestone features such as limestone pavement, scars....are vulnerable because of their scenic richness and harmony' and can be related back to the detail text contained in the sensitivity assessment. It is considered that variations in character of this degree would not make a difference to the overall sensitivity rating of moderate/high for the landscape character type. In determining the overall capacity of this character type, the medium/high value given reflects that the Landscape of County Importance and strong geological, ecological and historical associations have been adequately considered.	No action required
445	91	Challenge rarity value of ordinary for sub-type 12a	This is not accepted. Referring to the rarity scale (Part 2: Appendix 2) at 2.7% Limestone Farmland is at the lowest end of the ordinary category verging on the unusual and not very different from the other landscape sub-types in Type 9. The rarity scale is a reflection of the area occupied by this landscape character sub type in relation to other sub-types in Cumbria. As such, the term 'ordinary' in no way reflects the potential rarity and value of features within the landscape (for which no baseline information was available) or distinctiveness in terms of landscape character. The 'distinctive historic features in the form of the classic enclosure landscape patterns of walls and farm settlements' referred to in the response were reflected in the original assessment when determining the County Landscape designation (Technical Paper No. 4 1992) with 'a strong pattern of high limestone walls which emphasise the landform and other built stone features' being the main example of the distinctive limestone characteristics. This designation was reviewed and renamed LoCIs as part of the production of the Joint Structure Plan 2001-16. The value profile in the landscape capacity assessment recognises the contribution of these attributes to the overall distinctive character in terms of built and cultural features. Cultural value of these features is also recognised under the Historic Environment (Associations) section by reference Conservation Areas in 'several villages across 12a' further detail in the descriptions. The landscape capacity statement indicates that these values have been taken into account in the capacity judgement. The Cumbria Landscape Classification is not 'based largely on geology' as stated by the consultee but on a whole range of factors. These are set out in the Cumbria Landscape Classification along and are reflected in its landscape character descriptions. Information from this has fed into the key characteristics that form part of the sensitivity assessments of the landscape capacity assessment.	No action required

ID	Consultee ID	Comments	Response	Action
446	101	Buffer zones need to be explored particularly relevant to Shap area (sub-type 12a)	This is not accepted. Providing buffer zones around the nationally designated areas of the Lake District National Park and Yorkshire Dales National Park would be contrary to PPS22, paragraph 14, which advises against the creation of 'buffer zones' around such areas and the application of policies that prevent the development of renewable energy projects. It is therefore not appropriate for the assessment to attach higher value to landscape character in terms of in terms of a setting to a landscape designation and thereby effectively reduce landscape capacity. However, the capacity statements elaborate on the summary text set in paragraph 3.22, Part1, by highlighting setting sensitivities that need to be considered at a site specific level. However the actual effects will be dependent on the precise relationship between a proposal and a designated area. It is unacceptable for potential harm to be assumed at a strategic level. As part of the restructure of the SPD section 3 text, from Part 1 will be moved to Part 2 which will deal specifically with landscape and visual effects. Part 1 will deal with general information and guidance on other planning issues.	No action required
447	83, 89	Query/misinterpretation of meaning of 'blander fringes' for Type 12	This is accepted in part. The reference to 'blander fringes' follows on from a sentence that highlights there are '...core areas that exhibit attractive limestone features...' in the area. There is also further explanation of these characteristics under Complexity and Order on the sensitivity assessment sheet. The SPD is to be restructured to reduce misinterpretation of the landscape capacity and section 3, Part 1 which currently sets out the need for the detail of the capacity assessment to be used as well as the summary capacity levels, will be moved to Part 2. Part 2 will focus exclusively on landscape and visual issues. However, in order to clarify what is meant here additional text will be added to the landscape capacity sheets and any summary contained in the revised Part 2. Appropriately experienced landscape architects are best placed to interpret the detailed descriptions and assessments at a scheme specific level and identify whether or not an area is considered 'bland' or not. The local planning authority would make the final judgement on this.	Add 'with fewer limestone features' after reference to blander fringes in Type 12 Capacity Statement.
448	16	Conclusion that upland moors are not suitable for wind turbines is illogical, in particular citing of remoteness questionable	This is not accepted. The remoteness and tranquillity criterion is only one of 8 sensitivity criteria and is given equal weighting with them when carrying out the sensitivity assessment. It is common for landscape capacity assessments to include criterion relating to remoteness and tranquillity. This criterion is generally considered to be a perceptual factor (a subjective response), but one that can be supported by objective physical evidence. This criterion is also supported by Natural England. It is unclear from the comments whether 'upland moors' refers to landscape character Types 12 and 13 ie uplands including moorland. Here the overall capacity found to be low/moderate or low. Or whether it also includes landscape Type 9 -intermediate moorland plateau, which has an overall capacity of moderate/high. It is not accepted that the SPD and its landscape capacity assessment suggests that upland moors are not suitable for wind energy development. However it should be noted that the majority of landscape type 13 fall within the North Pennines Area of Outstanding Beauty and policies apply in the Joint Structure Plan that support only small scale wind energy production.	No action required
449	103	Note 'cliff edge' element in Type 14	This is accepted. This comment is relevant to the key characteristics of this urban character type under Scale and Enclosure. It is also accepted that associated geology value needs to be identified as there is a RIGS site south of Whitehaven.	Amend sensitivity and value assessments accordingly.

ID	Consultee ID	Comments	Response	Action
450		Challenge lack of reference to registered common land in landscape type assessment sheets	This is accepted in part. Open access areas can have relevance to landscape visibility in particular key views. However detail, number and uncertainties about popularity of these areas makes inclusion as part of strategic capacity assessments impractical. Such areas will often coincide with established viewpoints and/or popular recreation routes which are covered in the landscape capacity assessments. However, it is considered these will be relevant to assessment of visual effects at a site specific level. A reference should be added to the explanatory appendix at the end of Part 2.	Mention open access areas in Appendix 1 Settlement Key Views section Note: Also mention in key views examples in Part 3: page 7.
451	16	The SPDs support for development in areas of mixed landscape could have an effect on urban centres.	This is not accepted. The landscape capacity assessment does not preclude development around urban centres or direct development to urban centres. It, instead, indicates the capacity that might be possible in different landscape types. Any proposal coming forward in urban or rural areas or around urban centres will be considered against the full range of issues set out in the SPD.	No action required
452	82	The broad approach will send mixed messages to the industry and result in more work for the local planning authorities.	This is not accepted. The aims of the landscape capacity assessment is to provide a strategic assessment indicating to developers, planning officers and others the potential capacity of a landscape to accommodate wind energy development. It should not and does not remove the need for detailed assessment to be carried out for all relevant planning issues on a site by site basis.	No action required
453	44	Landscape capacity assessment could be applied too rigidly	The Companion Guide to PPS22, paragraph 4.15, supports the undertaking of landscape capacity and sensitivity analysis to assist in determining the type and scale of renewable energy technology that may be appropriate in different types of locations. Paragraph 3.3 in the SPD explains that the capacity assessment only sets out an indicative capacity and should not be used in a definitive sense. It should be used to inform site selection and to determine the effects of a scheme on landscape character. It will be considered in conjunction with other guidance relating to wind, the need to support schemes where harm is not unacceptable and the need to identify where the need to provide renewable energy outweighs any environmental harm. It is not accepted that the landscape capacity findings would be applied too rigidly. Under the new structure section 3 of Part 1 will move to Part 2. Part 2 will provide guidance exclusively on landscape and visual issues and contain the landscape capacity assessment.	No action required
454	22, 77, 84	Suggest a clustering approach to wind is taken as the landscape capacity assessment could result in a proliferation of small schemes across the county.	This is not accepted. In accordance with PPS22 the guidance doesn't seek to identify sites or encourage development in any particular location. Instead the SPD provides guidance on landscape capacity and cumulative landscape and visual effects to assist developers when determining the best site for a new wind proposal. The SPD acknowledges that in some parts of Cumbria wind turbines might become a defining feature. However, the acceptability of this will be considered on a case by case basis looking at the full range of planning issues in an area and any identified cumulative effects.	No action required.
455	88	Concentrating on existing sites would be better as once established more turbines make little difference.	This is not accepted. In accordance with PPS22 the guidance doesn't seek to identify sites or encourage development in any particular location. Instead the SPD provides guidance on landscape capacity and cumulative landscape and visual effects to assist developers when determining the best site for a new wind proposal. The SPD acknowledges that in some parts of Cumbria wind turbines might become a defining feature. However, the acceptability of this will be considered on a case by case basis looking at the full range of planning issues in an area and any identified cumulative effects.	No action required

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ID	Consultee ID	Comments	Response	Action
456	14, 88	Concentrate new wind schemes on the west coast around Sellafield and Workington to Flimby, Camerton Dump, and offshore around Robin Rigg.	This is not accepted. In accordance with PPS22 the guidance doesn't seek to identify sites or encourage development in any particular location. Instead the SPD provides guidance on landscape capacity and cumulative landscape and visual effects to assist developers when determining the best site for a new wind proposal. The SPD acknowledges that in some parts of Cumbria wind turbines might become a defining feature. However, the acceptability of this will be considered on a case by case basis looking at the full range of planning issues in an area and any identified cumulative effects.	No action required
457	103	Support Part 3	Comments noted	No action required
458	103	Support reference to sequential views and advice on journey scenarios.	Comments noted	No action required
459	103	Improve guidance in Part 3	A review of the guidance will be carried out to take into account comments raised on Part 3.	Amend Part 3 to take into account comments raised during the consultation process.
460	24, 60	Add angle of view, frequency and duration of sequential views and relative elevation to the bullets on assessing the magnitude of visual effects, Part 3.	It is accepted that an additional bullet should be added to ensure the full breadth of visual effects are assessed.	Add a fifth bullet "Angle of view, frequency and duration of sequential views and relative elevation"
461	24	Clarify the position of single and twin turbines in relation to JSP policy ST4 in paragraph 3.13 and Part 3.	Under policy ST4 the definition of major development is 'development that has significant environmental effects and is more than local in character.' The SPD refers to the local policies that a scheme would be judged against in Part 1. This includes the specific details of the renewable energy policies that the SPD is adopted against and refers to the range of other policies that apply. However it is not considered appropriate to list these also as they are far ranging, will vary with the specific location and circumstances of a scheme and some policies are emerging through the Local Development Frameworks. It is not accepted that the scale of development section relating to the landscape capacity methodology should duplicate text in Part 1.	Amend paragraph 1.14 Part 1 "This SPD provides guidance and interpretation against two key policies of the Joint Structure Plan - Policies R44 and R45... In addition to these several other policies of the JSP apply and proposals will be judged against these also..." Under the new structure this becomes paragraph 1.14 Part 1.
462	24	Amend reference to '4-5 levels' to 'at least 5 levels' in Part 3.	This is accepted to provide consistency with Part 2, Appendix 2 and guidance from DETR and Newcastle University.	Replace text as set out here where it occurs in Part 3. Agree, as a consequence will also need to change significance reference/example page 16 to: "Categorisation of the significance of effects using a textual scale is preferred, for example 9 levels from low to major....."
463	103	Support presentation material guidance and the need to make information available to community stakeholders.	It is standard practice for all planning applications to be made available for members of the public and stakeholders to view. Increasingly such information is being made available via the internet. The presentational guidance requests photomontages and wire frames.	No action required

ID	Consultee ID	Comments	Response	Action
464	103	Add more on historic landscape characterisation in the Description of Landscape resource.	The Historic Landscape Characterisation (HLC) is primarily relevant to assessment of effects on cultural heritage and as such any reference to it should be made in Part 1 6.22-6.26. However it does have secondary relevance to the assessment of landscape effects in terms of value and Part 3 already recognises this by reference to Part 2: Table 2 on page 10. It also relevant to landscape character; historic elements such as field patterns might be noted which in turn might contribute to a sense of history (perceptual aspect) and the HLC could add background information to these. Indeed JSP Technical Paper No. 5: Landscape Character already contains sections on supporting historic information in part derived from the HLC and in turn they are reflected on the landscape capacity sheets in Part 2. Hence this aspect is already considered to be adequately covered albeit indirectly. To add a specific reference would suggest that other special interest references should be added eg Biodiversity Action Plan which would unbalance this section.	Add a reference to the HLC to the cultural heritage section in Part 1.
465	60	Rationalise text add diagrams, more headings etc too avoid confusion and duplication.	This is not accepted the structure mirrors that of the GLVIA. Part 3 is primarily aimed at landscape architects who would be very familiar with this. It does include more information on describing the effects as this has been found to be a weakness in many ES's recently reviewed which tend to focus almost entirely on magnitude. There are already headings and sub-headings and the balance is considered appropriate although section and paragraph numbering would be helpful.	Add section and paragraph numbers as other parts of SPD.
466	60	Refer to turbine size in Figure 1 under Feasibility and Site Selection stage.	This is accepted as it can have a bearing on the overall suitability of the site. It is relevant to achieving a comfortable fit with the scale of existing features/elements in the landscape eg drumlins (Type 7) and existing older turbines where extensions or adjacent developments are proposed. Part 1: 5.10 and 5.38-39, G20).	Amend Figure 1 : Siting and Initial Sizing: "Test suitability of specific site against landscape sensitivity and value criteria CWESPD Part 2 Tables 1 & 2) and determine the appropriate form of development eg large cluster related to geometric field pattern and turbine size related to the scale of existing landscape elements eg hills, existing turbines. Refine in response to scoping exercise and preliminary survey and analysis."
467	60	Refer to wireline analysis in Fig 1 under Conceptual Design stage	This is accepted. This reflects advice in Part 1: Section 5 and Part 3: Alternative Compositions Considered (page 5). However, it should not be limited to wirelines as photomontages give more context on land cover elements and videos may also be relevant eg to demonstrate compatibility of blade rotation speed for extensions or sequential views. Under the revised structure Part 1, section 5 moves to Part 2. This will focus on landscape and visual issues.	Add to end of Fig 1: Conceptual Design: "...from key views. Explore alternatives through a series of visualisations."
468	60	Alternative sites are usually covered in a separate chapter of the Environmental Statement (ES) and the LVIA does not specifically need to discuss them.	This is not accepted. PPS 22 Key Principle viii emphasises need to demonstrate how environmental effects have been minimised through careful consideration of location, scale, design and other measures and it is widely recognised that the landscape and visual effects of wind turbines are often a key issue when considering applications. Hence it is considered reasonable to expect the LVIA to demonstrate how these effects have been minimised through careful consideration of alternatives. This would in turn inform a general ES chapter on site selection and project evolution and design and access statements.	No action required.

ID	Consultee ID	Comments	Response	Action
469	60	Clarify that description of development and stages of development is relevant to LVIA as it is usual for the full project description and stages of development to be included elsewhere in the ES.	This is partially accepted. The text on description in pages 5-6 is intended to describe those aspects that are relevant to the LVIA only. It is accepted that the emphasis on relevance needs to be brought forward. The list on pages 6-7 include only items found to be relevant from extensive development control experience in relation to wind energy developments. It is also important to include reference to stages of development as this helps to understand likely duration of effects, which is a material planning consideration. The approach set out in the SPD reflects GLVIA guidance and it encourages greater involvement of the landscape architect in the design process.	Amend paragraph entitled Description: "Describe activities and elements of the project relevant to landscape and visual effects at each stage of its life cycle. The descriptions should include details on: [bullet points to remain as existing] Some of this may be achieved by cross referencing to other sections and figures within the ES. However a consistent and coherent picture is essential as it is the foundation for all predictions of effects. Relevant items requiring description include."
470	60	Condense and refine list of aspects relevant to LVIA under the 'construction phase' sub heading.	This is partially accepted. From experience all the items are relevant to landscape and visual effects. The physical dimension of vehicles and movements are relevant as they can cause indirect effects on an access route. Widening routes and creating passing places could have implications for visual amenity, visibility of scheme and local landscape character. However, some cross referencing to other parts of the ES may be acceptable. Also ID 60 comments identify need to transfer assessment points more relevant to LVIA from Part 1, Section 5. This is accepted and will result in a refined list.	Add "Some of this may be achieved by cross referencing to other sections and figures within the ES" beneath the list of aspects to describe. Refine some of the bullet points in the list of relevant items as follows: Construction Phase "External access and haulage routes for construction and delivery vehicles and any modifications to them Borrow pits, disposal and storage areas "Removal or reduction and reinstatement of temporary elements eg site compound, track verges and crane hard standings (replaces Site reinstatement) Operational Phase "Transformers and meteorological masts Decommissioning Phase Future land management and any elements to be retained."
471	60	Rationalise baseline conditions section with separation of visual and landscape aspects through further headings.	This not accepted. The structure reflects experience in scoping process and avoids duplication. Study area and viewpoints are relevant to landscape and visual effects. Viewpoints are chosen to represent landscape receptors as well as visual receptors. There are already headings and sub-headings and the balance is considered appropriate. The split between landscape and visual items is obvious through the ordering of this section. It is considered that further headings would over complicate the structure.	No action required
472	60	Increase minimum radius of study area for a stand alone scheme to 30km.	This is not accepted. The University of Newcastle reference in this response is assumed to refer to Table 17 therein. Under this table it is noted that the figures are approximate and should be adjusted upwards or downwards. The 18km threshold reflects potential for significant effects and Appendix 1 indicates the likely appearance beyond 18km to be inconspicuous and therefore unlikely to be significant unless there are receptors of exceptional sensitivity. Table 18 in the Newcastle study reflects this noting a limit of potential visual significance at the boundary between apparent and inconspicuous appearance. 18km reflects the 20% increase recommended in this study for turbines of around 100m. The expression of 18km as a minimum allows for flexibility to address such circumstances. This range helps to focus assessments, from experience some assessments over 30km are too superficial. Obviously if potential cumulative effects are identified an increased area would be relevant.	No action required

ID	Consultee ID	Comments	Response	Action
473	60	Combine viewpoints and routes with the description of Visual Context and Importance	This is not accepted. Viewpoints represent landscape receptors and visual receptors. Duplication on examples of key views can be avoided by making a simple cross reference.	Add to end of Key views bullet point page 8 "(see Part 2: Appendix 1)". Amend Description of Visual Context and Importance paragraph page 10 by deleting third sentence and add to end of second sentence "key views as defined above at paragraph xxx".
474	60	Remove distance - based 'ranges' from Format of Landscape Descriptions (page 8) and Description of Landscape Effects (page 11)	This is not accepted. The Guidelines for Landscape and Visual Impact Assessment (2002) (GLVIA) provides general guidance and does not preclude the concept of range bands to structure and focus assessment. At paragraph 6.3 the GLVIA under the heading of Methods and Tools states that "The level of detail provided should be appropriate to the scale of development, the sensitivity of the receptor and the potential for adverse (negative) or beneficial (positive) effects to occur", at 6.6 it refers to "the wider landscape setting and context" and at 6.7 that the landscape study "will address the site itself and its wider landscape context". These terms and structures are often used in LVIA's. It is considered common sense to refine these ranges for a unique type of development and relate them to likely appearance adopting the worst case principle (ie an open landscape). As recognised in the subsequent comment of response ID 60 "the study area for wind energy development is probably far more extensive than that envisaged for other forms of development referred to in the GLVIA." The refinement responds to a problem encountered with some wind energy LVIA's. Some assessments take an even approach in the level of detail across the whole of a study area and fail to provide sufficient detail for closer ranges where significant effects are most likely to occur. The distance bands are not prescriptive and could be discussed and refined at the scoping stage. They are described as approximate and the bands are derived from Appendix 1. This has been carefully considered through analysis of credible existing guidance and research. Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. However it is accepted that greater flexibility could be built in to facilitate differences in character (such as openness) and sensitivity and text will be added on this.	Amend distance bands as follows: Immediate Landscape Setting (within approximately 2-3km) Local Landscape Setting (within approximately 6-12km) Broad Landscape Context (within approximately 18-30km)
475		Include suggestions for specific receptors eg landscape character types and designated landscape, under Description of Landscape Resource (page 9) and Format and Description of Landscape Effects (page 11)	This is partially accepted. It is already done for landscape character types in the introduction to this section. This indicates that descriptions of physical fabric, characteristics and overall character are set within framework of range bands which encompass county sub-types, types and regional character areas with appropriate references. Since PPS 22 distinguishes national designations at paragraph 11 and also the Guidelines for Landscape & Visual Impact Assessment at 3.20, particular attention needs to be given to the special attributes and characteristics that justified the designations. Hence it is accepted that it makes sense to pick these out separately at the baseline and assessment of effects stages. It would also be appropriate to refer to the specific character assessments for such areas.	Add to end of Format of Landscape Descriptions (page 8). "Any national designations such as AONBs and Registered Historic Parks and Gardens should be picked out as separate landscape receptors within this framework and described by reference to any detailed citations or landscape assessments specific to the designation." Add to end of Format and Description of Landscape Effects: "...be structure according to the four ranges established at the baseline stage with national designations picked out separately paying attention to the qualities and characteristics for which they were designated (see paragraph XXX above)." Paragraph numbers to be added to respond to comments and improve use of this section.

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ID	Consultee ID	Comments	Response	Action
476	60	Rewrite Landscape Sensitivity section clarifying factors to include in judgement and how a scale of sensitivity should be defined.	<p>This is not accepted. This comment relates to wider confusion within the landscape profession about the term 'sensitivity' and the different ways it is defined and applied to capacity assessments and LVIA. With regard to the latter the Guidelines for LVIA is quite difficult to follow but the key point is made at 7.17 "The determination of the sensitivity of the landscape resource is based upon an evaluation of each key element or characteristic of the landscape likely to be affected. The evaluation will reflect such factors as its quality, value, contribution to landscape character, and the degree to which the particular characteristic can be replaced." Part 3 is primarily aimed at landscape architects and they should be aware of this be able to understand this section. It is accepted that the wording is not entirely consistent with the GLVIA and should be amended accordingly. The factors to include in a judgement are described in the context of value by cross reference to Part 2: Table 2 and provides some advice on how scales should be defined by reference to the DETR scale as an example which reflects designations and rarity.</p>	<p>Reword start of Landscape Sensitivity section: "The GLVIA explains that determination of the sensitivity of the landscape resource is based upon an evaluation of each key element or characteristic of the landscape likely to be affected. The degree....."</p>
477	60	Remove cross references to Part 2 and separately list sensitivity criteria. Part 3 could be read in isolation.	<p>This is not accepted. As explained above it is the value aspects of sensitivity that are relevant to significance judgements on specific proposals. Reference is therefore made to value criteria not sensitivity. In the process of scoping, design and preparation of the LVIA landscape architects will need to refer to both Parts 1 and 2 of the SPD. To improve the presentation and understanding of the SPD, Part 3 will be integrated with Part 2 so all the advice on landscape and visual issues is contained in one part, removing any concerns of availability. Cross referencing will encourage all relevant aspects to be read in conjunction, including the iterative process between design and assessment set out in Fig 1. It will also avoid repetition and avoid confusion with sensitivity criteria in Part 2 for capacity assessment purposes which is different.</p>	No action required.
478	60	Remove references to specific distance ranges from Description of Visual Context and Importance section and suggest a site specific review.	<p>This is partially accepted. It is considered best to keep this aspect open to the whole study area at this stage until survey and desk top work are completed. However distances will be relevant to level of detail provided in the description of effects which comes later. The site specific review suggested is also more relevant to this stage.</p>	<p>Under Description of Visual Context and Importance delete: "Significant visual effects are most likely to occur in the close (2.4km) and middle (6km) distance ranges so description should concentrate and be structured according to these."</p>
479	60	Remove factors that will affect magnitude of change from Description of Visual Context.	<p>This is accepted. However analysis does need to identify influences on views towards the site in accordance with Guidelines for Landscape and Visual Impact Assessment paragraph 6.32 "Elements such as landform, buildings or vegetation that may interrupt, filter or otherwise influence views are also identified."</p>	<p>Delete last sentence of Description of Visual Context and Importance and substitute: "Identify the main shadow areas in the ZVI and describe any significant landform, built or vegetative screening elements. Also describe other significant influences on views towards the site eg channelled views along valleys or a coastline or distinctive skylines that draw the eye."</p>
480	60	Rewrite Visual Receptor Sensitivity Section clarifying how they relate to viewpoints, listing judgement factors, and how scale is defined.	<p>This is not accepted. The preceding Viewpoint and Routes section already explains the relationship. Salient factors in relation to wind energy are already highlighted based on development control experience and issues arising in Cumbria. It is considered that the guidance would be too prescriptive if it defined the scale.</p>	No action required.

ID	Consultee ID	Comments	Response	Action
481	60	Rationalise Assessment of Effects (landscape, visual and cumulative) section by merging Format and Description with Magnitude.	This is not accepted. The distinction is very important and addresses a specific weakness in the quality of the descriptions of effects found in many of the ES's recently reviewed. These have tended to focus almost entirely on magnitude. The advice draws on a lot of valuable Scottish Natural Heritage guidance, experience pertinent to Cumbria, Countryside Agency/SNH Landscape Character Assessment Guidance and the Part 2 capacity work in developing specific sensitivity criteria. It is considered, in this area, to significantly advance/interpret the GLVIA guidance in a way that is specific to wind energy. The later example in response ID 60 on quantifying landscape effects on physical fabric in the description is not the same as using extent as one of the criteria in determining magnitude (scale of change). The two stages of describing/identifying effects and determining magnitude are generally referred to at paragraph 7.1 of the GLVIA, for landscape effects 7.14, and for visual effects at 7.24-30 and 7.36-37.	No action required.
482	60	Remove reference to neutral effects in Assessment of Effects: General section (page 11) and Nature of Effects section (page 15).	This is accepted. The neutral category makes common sense and is in Highways Agency guidance etc, however as the EIA regulations terminology is the "backbone for an ES" (GLVIA 3.9) this reference will be deleted.	Delete "neutral" bullet point 4 General section page 11
483	60	Clarify duration and permanence of effects in Assessment of Effects: General section.	This is accepted. Need to bring in line with EIA regulations.	Amend last sentence of second paragraph of General section page 11: "Describe the degree of permanence duration of effects that is whether they are permanent or temporary (short, medium or long term)."
484	60	Method of describing landscape effects (page 11) and cumulative landscape effects (page 13) arising at each representative viewpoint is invalid. References to visual assessment should not be made in landscape effects section.	This is not accepted. There is a misunderstanding here that viewpoints only represent visual receptors and are only relevant therefore to visual assessment. This is incorrect as explained on page 7 they represent both visual and landscape receptors. From experience they use the same viewpoints. Using representative viewpoints for the landscape assessment follows GLVIA guidance 6.11.	No action required
485	60	Remove reference to landscape sensitivity criteria in Part 2 Table 1 from description of landscape characteristics as receptors in baseline and effects section and.	This is not accepted. Within EIA work landscape characteristics are receptors in the sense of receiving the impacts of a particular development. It is appropriate for both the baseline and effects sections to refer to Table 1 which lists the key characteristics which exhibit the impacts of a wind energy development (as explained in Part 2: paragraph 2.6). As explained in the introduction to the landscape capacity assessment section in Part 2 the landscape value criteria are intended to have application at a site specific level (paragraph 1.5). It is accepted that reference to this table is missing from the baseline section.	Add reference to end of Characteristics bullet on page 9: ".....managed, historic. Pay particular attention to those characteristics sensitive to wind energy development (see Part 2: Table 3). Table number revised under new structure.
486	60	Remove reference to 'significant' effects from section on Format and Description of Visual Effects	This is accepted as this refers to a stage in the LVIA process that is prior to the stage determining significance. Significance assumptions are also built in to reference to 'high sensitivity' receptors in the second paragraph. It is accepted that there is little point in considering lower sensitivity receptors at middle to longer ranges. However the EIA is required to identify significant effects and it is considered prudent to focus the assessment accordingly.	Delete words 'high sensitivity' and 'significant' from second paragraph. Amend last sentence of third paragraph to: Pick out any notable effects on higher sensitivity receptors in the middle to long range (beyond 6km).

ID	Consultee ID	Comments	Response	Action
487	60	Remove distance - based 'ranges' from Format and Description of Visual Effects	This is not accepted. The Guidelines for Landscape and Visual Impact Assessment (2002) (GLVIA) provides general guidance and does not preclude the concept of range bands to structure and focus assessment. At paragraph 6.3 the GLVIA under the heading of Methods and Tools states that "The level of detail provided should be appropriate to the scale of development, the sensitivity of the receptor and the potential for adverse (negative) or beneficial (positive) effects to occur", at 6.6 it refers to "the wider landscape setting and context" and at 6.7 that the landscape study "will address the site itself and its wider landscape context". These terms and structures are often used in LVAs. It is considered common sense to refine these ranges for a unique type of development and relate them to likely appearance adopting the worst case principle (ie an open landscape).	No action required
488	60	Remove reference to cumulative sensitivity criteria (Part 1 Table 3) from Format and Description of Cumulative Effects section.	This is not accepted. It is appropriate for this section to refer to Table 3 which lists the key characteristics that could be effected by a wind energy development (as explained in Part 2: paragraph 2.6). The key characteristics include visual factors ie visual interruption and Settlement and Key Views which reflect the inherent sensitivity of the effected landscape character and visual context (see Part1 Section 4: G3).	No action required
489	60	Remove reference to 'significant' effects from section on visual cumulative effects (page 14)	This is accepted as this stage is prior to the stage that determines significance.	Amend second sentence of first paragraph in visual section : "Extrapolate the results to summarise the cumulative effects on visual amenity."
490	60	Remove reference to pre-development landscape, assessment from section on visual cumulative effects (page 14), it should consider impacts that arise from addition of the proposal.	This is partially accepted and the guidance should be closer to the conclusion in Box 7.1 item 3 of the GLVIA. It is accepted that there is a need to clarify the concept of 'additional' as defined by SNH which seems to have been misunderstood in response ID 60.	Reword first sentence of last paragraph of visual section: "Where proposals are extensions or adjacent to existing wind energy development, changes in scale need to be taken into account involving a consideration of the ability of the receiving landscape to accommodate the larger composite feature (see Part 1: Section 4)." Reword second sentence of first paragraph of Format and Description of Cumulative Effects: "Identify the extent to which the proposal would create additional cumulative effects that are additional to the effects to be expected from the development individually (footnote: SNH Guidance: Cumulative Effects of Windfarms 2005)."
491	60	Add definition and role of magnitude in Magnitude of Effects section	This is partially accepted. The role of magnitude is explained in the Significance section. However, it is considered appropriate to use the GLVIA glossary definition.	Amend following as first sentence to Magnitude of Effects section: "Magnitude is a combination of the scale, extent and duration of an effect (footnote: GLVIA)."
492	60	Provide guidance on wording, definitions and examples of the grading of levels of magnitude.	This is not accepted. It is considered that the guidance goes far enough in setting out typical criteria to take into account for determining magnitude. The guidance is primarily aimed at landscape architects who should be familiar with wording for the grading of levels.	No action required

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493	60	Include and explain the role and incorporation of nature, duration and reversibility of effect in Magnitude section.	This is partially accepted. Duration is included in the GLVIA definition of magnitude. Nature (ie adverse or beneficial) is not included in the glossary definition although it is mentioned with regard to landscape at paragraph 7.21 – 22 but not visual effects. No reference is made to reversibility in these paragraphs but it is assumed that this is covered by degree of permanence as part of duration. A section entitled Nature of Effects in the guidance already discusses determination of this aspect and explains why it is preferable to separate out nature of effects from considerations of magnitude (see page 15). Changes to the document as a result of other comments will clarify the position on this.	Add a fifth bullet “Angle of view, frequency and duration of sequential views and relative elevation” to text on assessing the magnitude of visual effects, Part 3.
494	60	Clarify whether the assessment of visual magnitude is carried out using viewpoints or visual receptors.	This is not accepted. This is considered unnecessary as the guidance is primarily aimed at landscape architects who are familiar with using representative viewpoints as a tool to predict wider landscape, visual and cumulative effects. Magnitude is a consideration for viewpoints and the findings are extrapolated as previously discussed in the previous section. Experience in reviewing ES's indicates this process to be widely understood.	No action required
495	60	Distinguish between cumulative landscape and visual magnitude criteria and include cumulative visual effect on routes.	This is partially accepted. The effect on routes is covered by the ‘Frequency and duration of sequential views’ bullet point. It is recognised that this needs to be consistent with previous text in Part 3 and with Part 1 Section 4 (to become Part 2, section 2) which distinguishes between cumulative landscape and visual effects.	Amend start of Cumulative Effects section: “Define separate sets of criteria to categorise the magnitude of landscape and visual cumulative effects. These are expected to make reference to the following: (Bullet points to stay the same)
496	60	Clarify that categorisation of significance levels is not required by the EIA Regulations.	This is partially accepted but greater clarity can be achieved by stating a preference. It is considered helpful to have categories as suggested by the GLVIA (7.42) because of the complexities associated with wind energy development LVIA. It provides some consistency and discipline in determining judgements and assists in understanding them. From experience it is common practice to categorise significance of effects in this form of development and others such as highways.	Overlap with item 6 above. Amend start of Significance section: “Categorisation of the significance of effects using a textual scale is preferred, for example 9 levels from low to major.....”
497	60	Matrices should not be advocated as the preferred method of assessing significance	This is not accepted. Experience and Newcastle Study justify this preference. From extensive experience of reviewing ES's in the minority of cases where matrices have not been used the basis of significance upon which judgements have been made has not been transparent. It provides some consistency and discipline in determining and justifying judgements. A caveat on their use is already included.	No action required

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498	60	Clarify threshold for distinguishing between effects that are significant and those that are not	This is partially accepted. As explained in the Newcastle study (6.4.2) the regulations offer no unequivocal guidance on the significance threshold ie at what level does it become significant in planning terms. It goes on to say "Until such time as a robust consensus on significance, based on detailed research, can be claimed with confidence, best practice requires that the bases for all judgements made are clear and explicit on a case –by –case basis." The GLVIA offers no guidance on an appropriate threshold but does highlight the need to determine it at 7.38 and therefore this guidance should do the same.	Add after revised first sentence of Significance section: "It is for each assessment to determine which effects are significant or not in terms of the Town and Country Planning (EIA) Regulations 1999, in other words to determine a significance threshold. This should be based on a well reasoned judgement supported by thorough justification for its selection and explicit explanation as to how the conclusions about each effect assessed have been derived. From experience in Cumbria where a scale of levels is used those at the higher end of the scale are generally deemed to be equivalent to significant effects in terms of the regulations." (start new paragraph).
620	8	Coastal turbines should be painted white	Guidance is provided in paragraphs 5.23 - 5.25 on the most appropriate colours for wind turbines. It acknowledges that the circumstances around a site will help determine the most appropriate colour for each individual scheme. It is likely that this will come from a palette of colours from white to dark grey.	No action required
621	29	Object to the enlargement of offshore windfarms around Walney.	Comments noted. It is not accepted that the guidance should extend to offshore developments as such projects are not covered by the land use planning system. The SPD currently covers the issue of seascape in relation to the effects of wind energy development on the character of the coast. As offshore wind energy and other development forms part of the seascape the SPD highlights the need for consideration to be had on their effects with coastal proposals. It is accepted that additional text could be added to the cumulative effects section to ensure offshore wind schemes are taken into account by assessments of onshore schemes.	No action required
622	135	Wind turbines should not be sited near or on areas of natural beauty as many towns rely on tourism to boost the local economy (paragraph ref 3.20)	It is not accepted that the SPD should include a statement to this end. The SPD already refers to the policy that applies to national landscape designations that support small scale development of a single turbines with a hub height of less than 25m. With regard to areas of landscape adjacent to such landscape designations, PPS22 specifically says that "local planning authorities should not create buffer zones around international or nationally designated areas." The SPD does not introduce buffer zones or seek to unnecessarily constrain development adjacent to national designations. Paragraph 3.22 sets out the need for an assessment of the effects of a scheme on the 'setting' of a national landscape designation, in accordance with guidance contained in PPS22. This highlights that the potential impact of renewable energy schemes close to the boundary of designated areas is a material consideration to be taken into account when determining planning applications. 'Settings' to national landscape designations are not physically defined, and the text highlights the need for a landscape and visual impact assessment to be carried out to determine whether or not a scheme has an effect on any 'setting'. A reference will be added to clarify the legitimacy of referring to 'settings' of landscape designations. Under the new structure this text will move to Part 2.	No action required

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ID	Consultee ID	Comments	Response	Action
623	150	Map 1 why is no wind speed shown on LDNP coastline in Copeland	Map 1 only shows areas with an average mean wind speed of 6.5metres per second or above. Traditionally this was the minimum threshold that wind developers looked at. However, the map includes a caveat that highlights that wind turbines can work at wind speeds of less than 6.5m/s. Areas left unshaded are likely to have a wind speed lower than this and the lack of shading does not mean there is no wind in these areas.	No action required
624	132	Developers tend to overstate the amount of energy a development will produce.	This comment is noted. The SPD provides broad guidance on a range of planning issues linked to wind energy development, including effects on nature conservation, cultural heritage, landscape, local amenity etc . In accordance with PPS22 it does not seek to make assumptions about the technical efficiency of renewable energy development.	No action required.
625	150	The SPD does not identify that turbines can be things of beauty, or that wind is a clean energy source that can be easily decommissioned.	The SPD seeks to provide objective information on wind energy developments. To identify turbines as 'things of beauty' would add a subjective statement on this. It is not accepted that the SPD should do this. However, the guidance in Part 2 refers to sculptural qualities and landscape character types where development might provide an acceptable focal point in a landscape. Text contained in the siting and design sections refers to decommissioning and the need to revert a site back to its former character where possible.	No action required
626	150	Wind turbines should be sited on the coast and in windy uninhabited places.	It is not accepted that the SPD should identify such areas for development. In accordance with PPS22 the guidance doesn't seek to identify sites or encourage development in any particular location. Instead the SPD provides guidance on landscape capacity and cumulative landscape and visual effects to assist developers when determining the best site for a new wind proposal. The SPD acknowledges that in some parts of Cumbria wind turbines might become a defining feature. The acceptability of any sites along the coast, and in windy uninhabited places will be considered on a case by case basis looking at the full range of planning issues in an area and any identified cumulative effects.	No action required
627	28	Should RSS targets be included when they are so high and only at a draft stage.	It is considered appropriate to include reference to regional renewable energy targets in the SPD. These reflect national policy guidance and national targets for renewable energy production. The report of the independent panel that carried out an examination in public on the RSS has now been published. This states that it believes the targets that have been set out in the draft RSS are acceptable and should be retained for adoption in the RSS.	No action required
628	28	Does the SPD take into account potential changes to wind resources and patterns that could arise from climate change?	Map 1 that shows the wind speed areas of 6.5m/s and above reflects the current position on wind speed. The SPD provides this to indicate the wind resource available at the moment and to demonstrate the extent of the wind resource. PPS22 advises that development should not be restricted on the basis of technical information such as wind speed, and as such this information is not a relevant planning consideration. If in the future wind patterns change in such a way that turbines cease to turn for a significant period of time, conditions could be attached to the planning consent to ensure that they are decommissioned and removed from the landscape.	No action required

ID	Consultee ID	Comments	Response	Action
629	28, 32	Paragraph 2.1 is controversial as benefits are not shared by everyone. Developers benefit at the expense of tax payers.	Paragraph 2.1 refers to the benefits that renewable energy development can have towards mitigating climate change. It is widely accepted that climate change has a global effect and therefore reducing adverse effects will benefit all. It also recognises that local communities are directly affected by them, in planning terms and that there might be negative or positive effects. In accordance with PPS22, it does not seek to provide a cost benefit analysis of wind energy development or make a judgement on funding regimes. Paragraph 2.2 will be expanded to further explain the potential effects on local communities, but it is not accepted that this reference should be deleted.	Amend paragraph 2.2 "Wind energy developments could have a range of positive or negative effects on nearby communities. They could provide landowners with the opportunity for rural diversification, provide local jobs, and opportunities for community based schemes and educational resources. However, a range of planning related issues are often raised as concerns by the local community. These include landscape and visual effects, noise, shadow flicker and effects to the local economy. Although it is recognised that the concerns raised will often not be significant, and that negative effects may be localised in nature or could be mitigated against, in every case, developers need to consider if wind schemes will have a positive, negative or neutral effect on such issues. More guidance on what is expected is set out in throughout the guidance. In addition to this local communities often raise concerns relating to a reduction in house value, however this is not a relevant planning issue and is not addressed by this guidance." Under the new structure this becomes paragraph 2.34 Part 1.
630	28	If community benefits are not material planning considerations why provide guidance on them.	Although not considered material planning considerations it is good practice to encourage developers to work with local communities to identify and establish community benefits. The SPD provides 4 paragraphs on this issue, which is different to community engagement, and refers to national guidance that has been developed for the Renewables Advisory Board by the Centre for Sustainable Development.	No action required
632	28	Table 2 and appropriate scales of development are inappropriate and at odds with each other.	It is not accepted that the table should be changed. The table is an extract from Part 2. It provides a summary of the findings from the landscape capacity assessment. The detailed justification on the landscape capacity and the reasons supporting the most appropriate scale of development can be found in Part 2. However, as a result of the consultation the SPD is being restructured and this table and the text in section 3 will be deleted from Part 1, and will be moved to Part 2. This will reduce any uncertainty that arose from summarising the details in Part 1.	No action required
633	128	The area around High Pow has met its capacity and further development should not define the character of the area.	The landscape capacity assessment takes a broad strategic view on the capacity for further wind energy development to be accommodated across Cumbria. This concludes that the landscape types within and around the High Pow area have low/moderate or moderate capacity to accommodate wind development. However this is just one aspect of the SPD and needs to be considered against other planning issues and an assessment of cumulative effects. It would be contrary to national planning policy in PPS22 to identify areas that should not be subject to further development. The information in the SPD will be used on a case by case basis to determine whether or not further wind energy development is acceptable in this, or any other part of Cumbria.	No action required.

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ID	Consultee ID	Comments	Response	Action
634	128	Separation distances should not be reduced in paragraph 4.4.	It is accepted that the guidance shouldn't stipulate separation distances. These should be determined on a case by case basis reflecting the local landscape character, site circumstances and the nature of the scheme proposed. The text will be amended to reflect this.	Revise 4.4 "This Guidance does not stipulate separation distances or the number of schemes that might be accommodated in the County as these are likely to vary depending on the details of a scheme and the issue being considered, such as landscape character or nature conservation interest. The consideration of cumulative effects can only be undertaken on a case by case basis in the light of existing baseline conditions, accurate descriptions and visualisations of effects on key receptors, and relationships with other developments. These are impossible to predict at a broader level." Under the new structure this becomes paragraph 1.24 Part 2.
635	57	Information should be provided on the effect of a wind turbines on an area's status.	This is not accepted as wind energy development should not change the status of an area. Development within a designated area would only usually go ahead where no significant harm arises and should not bring about a change in status.	No action required
636	57	Any financial benefits need to quantify losses to employment (tourism) and house prices.	Section 2 seeks to provide advice to developers when engaging with the community. It is not the role of the SPD to set guidance on perceived or actual financial losses to individuals through house value as this is not a relevant planning issue. Developers are required to consider the effects of a scheme on the local economy and advice is set out on this in section 6. Again it is not considered appropriate to include advice on community benefits offsetting any perceived or actual losses. Instead advice is given to encourage developers to follow the new protocols that have been developed for engaging with communities and securing community benefits.	No action required
637	57	National Industry Data should be used to justify energy production and reduce incorrect data being used.	It is not accepted that the SPD should provide guidance on these issues. In accordance with PPS22 the SPD does not seek to make assumptions about the technical or commercial feasibility of renewable energy development. This is not a relevant planning issue and should not be considered by the SPD. The British Wind Energy Association provide technical data on energy production and carbon reduction which developers should use - www.bwea.com/edu/calcs.html	No action required
638	57	A protocol should be produced to build trust, prevent developers from resubmitting schemes following refusal and to apply a consistent approach to anemometers.	It is not accepted that developers shouldn't be allowed to review a scheme following a refusal from the local authority. However, as set out in section 2, developers are encouraged to engage with the local community early in the process to help inform the design and development of a project. In addition to this developers often hold pre application discussions with local authority planning officers and seek advice from a range of organisations as part of the scoping process for an Environmental Impact Assessment. This can all assist in a scheme being submitted that addresses key concerns at the outset. If a scheme is refused developers have the opportunity to review a scheme to see if they can address the reasons for refusal and develop a more acceptable scheme. Equally they have the right to challenge any decision at appeal. This process is set out in legislation and it would be inappropriate for the SPD to seek to set an alternative approach. Developers considering the installation of an anemometer must be required to follow national planning regulations on this. An additional protocol is not required.	No action required

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639	14, 57, 97	Whole life energy costs, cost benefit analysis should be considered.	It is not accepted that information should be provided on the amount of energy used to produce a wind turbine or the economics of wind energy schemes as these are not relevant planning considerations. However, research shows that a wind energy development will produce far more energy during its life cycle than will be used to manufacture the turbines, bases and other infrastructure. It could take as little as 8 months of operation to offset production energy.	No action required
640	59	Can paragraph 4.8 specify the amount of wind energy development an area can take before a change in the landscape character classificaiton would occur.	The SPD is a broad based strategic document. As set out in paragraph 4.4 the consideration of cumulative effects can only be carried out on a case by case basis taking into account the circumstances of a site and its locality and relationship with other developments. It is not practical or appropriate to include information that specifies how much development would be acceptable without causing a change in landscape character classification. It is unlikely that wind energy development would occur in such large amounts to warrant a reclassification of landscape character type. It is more likely that they would become a prominent or defining feature within the overall character type.	No action required
641	59	Paragraph 4.27 could state that development will not be acceptable where turbines are within 2.4km of occupied dwellings.	It is not considered acceptable to introduce minimum distances between dwellings and turbines. Although PPS22 suggests that minimum separation distances can be identified between renewable energy development and existing development it considers it more appropriate to establish the appropriate distance on a site by site basis based on a detailed noise assessment and detailed consideration of local landform and features, type of turbine and site characteristics.	No action required
642	43, 59	The SPD supports the views of developers and assists them getting schemes approved rather than supporting the views of local communities.	This is not accepted. Guidance on renewable energy developments, including wind, needs to reflect Government planning policy. This advises that renewable energy should be supported unless significant harm is likely to arise. The SPD has been developed to identify the range of issues that need to be taken into account when determining whether or not a wind energy development is acceptable. It would be inappropriate and contrary to government policy for the SPD to suggest that no wind energy development was acceptable in Cumbria. The SPD does identify the importance of local community views in section 2, Part 1. This stresses the importance of developers engaging with communities to understand any planning related concerns and seek to mitigate against these. This is further expanded upon in Section 6, Part 1 which looks at local amenity issues such as noise, and local economy issues.	No action required
643	59	It should be acknowledged that wind turbines are industrial structures and can cause problems with siting in inhabited rural areas.	Visual effects will vary with the size and number of turbines and the landscape characteristics of an area. The SPD acknowledges that visual effects can sometimes be great, and in accordance with PPS22, provides guidance on the design and siting of wind energy development to ensure developers consider the visual effects at the planning stage.	No action required
644	51, 52	Money spent on wind schemes and opposition to them could be better spent on increased funding on consistent/other sources of energy.	The finance and economics of wind energy schemes, or government investment on energy supplies is not a relevant issue for the SPD. It would be contrary to national planning guidance to restrict development on technical or commercial grounds.	No action required

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ID	Consultee ID	Comments	Response	Action
645	52	Grouping development around an AONB would be detrimental to the quality of life for residents and discourage tourism.	The guidance seeks to provide guidance to steer development to acceptable locations in Cumbria. It sets out guidance on the importance of considering cumulative effects and demonstrating that significant adverse effects would not arise. It also includes guidance to ensure development takes into account any effects on the settings to national designations, such as AONB's. Additional guidance is provided on local amenity and local economy considerations. This would all assist in determining whether or not schemes being proposed in proximity to an AONB would be acceptable.	No action required
646	32	If unacceptable effects occur following construction what will happen, eg noise, telecoms, effects on hydrology etc? If monitoring mechanisms are in place should they be included in the SPD?	Planning conditions are attached to planning consent to assist in dealing with any adverse effects that may arise from an operational development. It is not accepted that the SPD should include reference to all the conditions or monitoring processes as these need to reflect the circumstances of a development.	No action required
647	32	Following decommissioning would a site be considered a brownfield site?	Following the decommissioning of a site it is not expected that the site will be given brownfield land status. The purpose of decommissioning is to secure the removal of the turbines, buildings and to cover the bases with soil and vegetation and to establish the rural characteristics of the site prior to development.	No action required
648	32	Can pressure be applied to Government to provide incentives to developers for renewable energy in new development.	This is beyond the remit of the SPD. However government grants are already provided to encourage renewable energy in new and existing development. Government policy also enables local planning authorities to seek renewable energy production in new development of a certain size. The Cumbrian local planning authorities will be considering the introduction of such policies through the emerging Local Development Frameworks.	No action required
649	13	Why are there no turbines in the South East or Manchester?	It is not accepted that the SPD should refer to the national or regional distribution of wind turbines. The SPD supports local policies that reflect the need to meet regional targets. These reflect national targets and each region will be setting similar targets to meet. Obviously Manchester falls within the same region and renewable energy targets have been set for this area in the draft Regional Spatial Strategy. These include a significant proportion of the targets to be met by wind turbines.	No action required
650	14	Awareness should be raised on the need to save energy.	The SPD acknowledges that there is an energy hierarchy that includes energy savings. It is accepted that further reference should be made to the Regional Sustainable Energy Strategy that provides more information on energy reduction and renewable energy production. It is not accepted that the SPD should provide further detail as its focus is to provide planning guidance on wind energy development.	Add text to paragraph 1.1 "Regional Guidance The North West Sustainable Energy Strategy, July 2006, sets out the action needed to tackle climate change for the North West. This suggests that the greatest cross cutting impact in our region is likely to be increased risks of flooding. Other issues will include sea level rise and an increase in annual temperatures. This could lead to heat waves, moorland fires and a change in biodiversity as some species fail to evolve to the new climate conditions and habitats. It sets out a hierarchy for action that reflects the Government's approach above. Under the new structure this becomes paragraph 1.11 Part 1.

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ID	Consultee ID	Comments	Response	Action
651	153	Turbines should be sited by pylons.	<p>It is not accepted that the SPD should include a statement that turbines are acceptable by pylons. The SPD applies equally to locations such as this as any other schemes. The characteristics of vertical structures, such as pylons, are taken into account through the landscape capacity assessment. It is not accepted that a preference should be made to such locations. The SPD seeks to provide general guidance on siting and design and highlights the need to be aware of the relationship with manmade structures and the scale of buildings and landscape characteristics.</p>	No action required
652	127	Don't accept that wind development is likely to be inappropriate in NP AONB. Schemes should be judged on their merits.	<p>This comment is noted. The North Pennines AONB is currently covered by Joint Structure Plan policy R45. This only supports wind energy development in the AONB for a single turbine with a hub height of less than 25m. The landscape capacity assessment broadly accords with this policy. It should be noted that this is a broad assessment, is indicative only, and doesn't reflect the individual circumstances of any site. The JSP enables schemes larger than set out here to be judged against Policy ST4. This enables any schemes that may come forward to be judged on their own merits.</p>	No action required
653	16, 40, 41, 74, 103, 61, 80, 150	Comments on the Sustainability Appraisal Report.	These are contained in the Sustainability Appraisal Report D.	See Sustainability Appraisal Report D.
654	60	State that if proposed development illustrations provided elsewhere in ES there is no requirement for there inclusion in LVIA.	<p>This is not accepted. From experience it is considered necessary to encourage greater involvement of the landscape architect in the design and ensure any landscape iterations are properly illustrated. A consistent and coherent picture incorporating site landscape fabric and mitigation measures as part of the proposal is considered essential.</p>	No action required
655	60	Remove requirement for generalised range bands from Landscape Character and Policy Context and ZVI mapping or determine on a site specific basis	<p>This is not accepted. The GLVIA is general guidance and does not preclude the concept of range bands to structure and focus assessment. At 6.3 the GLVIA under the heading of Methods and Tools it states that The level of detail provided should be appropriate to the scale of development, the sensitivity of the receptor and the potential for adverse (negative) or beneficial (positive) effects to occur", at 6.6 it refers to "the wider landscape setting and context and at 6.7 that the landscape study "will address the site itself and its wider landscape context. These terms and structures are often used in LVIA's. It is considered common sense to refine these ranges for a unique type of development and relate them to likely appearance adopting the worst case principle (ie open landscape). The bands are derived from Appendix 1 which has been carefully considered through analysis of credible existing guidance and research. Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. From experience it is standard practice to show range bands on LVIA plans. These have commonly mirrored the ranges described in PAN 45, it is considered appropriate to provide guidance more relevant to third generation turbines. They are not prescriptive and could be discussed and refined at the scoping stage. An appropriate caveat guarding against mechanistic use is already included in Appendix 1.</p>	No action required

ID	Consultee ID	Comments	Response	Action
656	60	Immediate Landscape Setting Plan a useful tool but remove prescriptive radius.	<p>This is not accepted. The GLVIA is general guidance and does not preclude the concept of range bands to structure and focus assessment. At 6.3 the GLVIA under the heading of Methods and Tools it states that "The level of detail provided should be appropriate to the scale of development, the sensitivity of the receptor and the potential for adverse (negative) or beneficial (positive) effects to occur", at 6.6 it refers to "the wider landscape setting and context" and at 6.7 that the landscape study "will address the site itself and its wider landscape context". These terms and structures are often used in LVAs. It is considered common sense to refine these ranges for a unique type of development and relate them to likely appearance adopting the worst case principle (ie open landscape). The bands are derived from Appendix 1 which has been carefully considered through analysis of credible existing guidance and research. Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. From experience it is standard practice to show range bands on LVA plans. These have commonly mirrored the ranges described in PAN 45, it is considered appropriate to provide guidance more relevant to third generation turbines. They are not prescriptive and could be discussed and refined at the scoping stage. An appropriate caveat guarding against mechanistic use is already included. Appendix 1. Flexibility is built as the radius as it is expressed as a range of 2.4 – 6km; however there is a need to make the title consistent with Fig 1 and Format of Landscape Descriptions section. This plan is considered to be more than a 'useful tool' but an essential illustration of a fundamental design iteration ie how the design has taken account of an analysis of the setting and its relationship to key views (see Fig 1 Conceptual Design stage). It is accepted that the description needs to clarify this and tighten the link.</p>	Delete word "Immediate" from title and substitute "Local". Rework description: "Showing landscape and visual analysis relevant to proposed Composition of the development with radius of 2.4-6km (including viewpoints, main landscape elements and features, contours and topographic grain, field patterns, focal points, other visual forces and elements modifying or screening visual effects)"
657	60	Suggested scales for mapping inappropriate and impractical	<p>This is not accepted. From extensive experience of using ES's the smaller scales suggested are often illegible and an inadequate tool for considering significant effects likely to occur in the closer ranges (ie illustrate whole study area of 30km at superficial level). The study area range should not automatically be 30km for a stand alone scheme but 18-30 km see item 16 above. It is useful to see the designations/policies in the context of the character types. The 10k scale maps are appropriate to setting analysis as they show field / settlement patterns etc. Graphics should not be determined because they are convenient to the A3 sheet format as explained in the introduction. Other options are practical fold out plans, pockets or compromises might be agreed with the planning authority at scoping stage eg 'close-ups' on closer ranges where study area is agreed as 30km for Character and Policy Context; smaller scale master with division into quadrants for Cumulative ZVs (as Npower Hellrigg ES).</p>	No action required
658	60	Clarify 'combining individual ZVs for each turbine'.	<p>This is accepted. Phrase is based on GLVIA guidance (page 150) and a cross reference required. This comment and examination of recent ES's highlights that combined turbine ZVs appropriate to cumulative maps but for stand alone ZVs need to be more refined ie shading to show no.s of turbines which may be visible.</p>	Amend description of Extent of Visibility as follows: "ZVI for hub height and blade tip on OS 50,000 Landranger colour map base with radius of 18 – 30km indicating the numbers of turbines eg 1-2, 3-4, 5-6 which may be visible by use of shading (GLVIA p150) Indicate..." In second paragraph of description of Cumulative Visibility insert: "...and white map base. Use composite ZVs for each scheme noting that all or part of the development of may be seen (GLVIA p150). Indicate viewpoint..."

ID	Consultee ID	Comments	Response	Action
659	60	Radius of close –up ZVIs should be site specific not restricted to 6km	<p>This is not totally accepted. The GLVIA is general guidance and does not preclude the concept of range bands to structure and focus assessment. At 6.3 the GLVIA under the heading of Methods and Tools it states that "The level of detail provided should be appropriate to the scale of development, the sensitivity of the receptor and the potential for adverse (negative) or beneficial (positive) effects to occur", at 6.6 it refers to "the wider landscape setting and context" and at 6.7 that the landscape study "will address the site itself and its wider landscape context". These terms and structures are often used in LVAs. It is considered common sense to refine these ranges for a unique type of development and relate them to likely appearance adopting the worst case principle (ie open landscape). The bands are derived from Appendix 1 which has been carefully considered through analysis of credible existing guidance and research.</p> <p>Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. From experience it is standard practice to show range bands on LVA plans. These have commonly mirrored the ranges described in PAN 45, it is considered appropriate to provide guidance more relevant to third generation turbines. They are not prescriptive and could be discussed and refined at the scoping stage. An appropriate caveat guarding against mechanistic use is already included. Appendix 1. However some flexibility would be appropriate.</p>	Amend second paragraph in description of Extent of Visibility: "...within 6 -12km and indicate..."
660	60	Remove references to '35mm film format' recognise use of digital cameras	<p>This is partially accepted. SNH guidance indicates film size is relevant to the field of view, digital cameras have a sensor area smaller than a 35 mm film frame and so at same focal length has a smaller field of view, can correct by using 28mm lens to achieve required coverage or use image processing software. Examination of recent ES's indicates that film cameras are still used as well as digital ones.</p>	Amend Visualisations description as follows: "Visualisations (add new endnote: SNH Visual Representation of Windfarms Good Practice Guidance, 2006) based on photographs taken with single lens reflex (SLR) or digital single lens reflex (DSLR) cameras with a 50mm lens in a 35mm film format or its digital equivalent, reproduced..."
661	60	Review image size of approx 20cm to suit field of view variations	<p>This is partially accepted. This size is in accordance with best practice set out in SNH guidance and can be accommodated by fold out formats if necessary. However it also refers to an absolute minimum of 13cm for circumstances eg cumulative panoramas. These parameters have been accepted in a number of recent ES's.</p>	Amend Visualisations description: "...reading distance ie approx. 46cm, commonly A3 landscape format giving an image height of approx. 20cm (absolute minimum image height of 13cm for exceptional circumstances eg cumulative panoramas) and at a viewing angle close to the original field of view of the scene ie 45-130 degrees."

ID	Consultee ID	Comments	Response	Action
662	60	Rationalise level of detail required on cumulative base plan	<p>This is partially accepted. Intended for scoping stage and ES different scale and radius maybe appropriate. Footprints included successfully on cumulative baselines along with similar background information included on recent ES submissions (eg Npower Hellrigg ES) and will be accessible on planning files if they have reached the scoping stage. However accepted that multiple range bands on every scheme could be confusing. Has relevance to level of detail required in cumulative ZVIs, need to avoid duplication.</p>	<p>Amend cumulative base plan description: "Cumulative base plan (for scoping stage or ES)...within a radius of 60km at scoping stage (maybe less for ES depending on agreed study area)Indicate the footprint of each development and 30km radius around each in a different coloured solid line."</p> <p>Amend cumulative ZVI description: "...Indicate viewpoint locations representing cumulative effects and routes relevant to sequential effects. Indicate 2.4, 6, 12 and 18km range bands for the proposal. Use partially transparent colour shading to distinguish each development eg red, blue, yellow and areas from where one or more development is likely to be seen (with corresponding overlaps of orange green, purple etc). Where four or more schemes are involved ZVIs become difficult to interpret, use separate additional cumulative ZVIs."</p>
663	60	Appendix 1 conclusions are not relevant, can be misleading and be removed from the study along with any references to it.	<p>This is not accepted. The GLVIA is general guidance and does not preclude the concept of range bands to structure and focus assessment. At 6.3 the GLVIA under the heading of Methods and Tools it states that "The level of detail provided should be appropriate to the scale of development, the sensitivity of the receptor and the potential for adverse (negative) or beneficial (positive) effects to occur", at 6.6 it refers to "the wider landscape setting and context" and at 6.7 that the landscape study "will address the site itself and its wider landscape context". These terms and structures are often used in LVAs. It is considered common sense to refine these ranges for a unique type of development and relate them to likely appearance adopting the worst case principle (ie open landscape). As recognised in the subsequent comment of response ID 60 "the study area for wind energy development is probably far more extensive than that envisaged for other forms of development referred to in the GLVIA." The refinement responds to a problem encountered with some wind energy LVAs whereby an even approach in the level of detail right across the study area has been taken with insufficient detail provided for closer ranges where significant effects are most likely to occur. The distance bands are not prescriptive and could be discussed and refined at the scoping stage. They are described as approximate, however it is accepted that greater flexibility could be built in to facilitate differences in character (such as openness) and sensitivity. The bands are derived from Appendix 1 which has been carefully considered through analysis of credible existing guidance and research. Appeal case law and observation of recently constructed third generation schemes in and around Cumbria has also indicated these distances to be appropriate. They act as an essential benchmark for considering schemes both individually and cumulatively and have been accepted by a number of developers currently submitting applications.</p>	No action required