

RENEWABLE AND LOW CARBON ENERGY SPD – CONSULTATION STATEMENT

The Town and Country Planning (Local Planning) (England) Regulations 2012

This statement has been prepared in accordance with the above regulations and in particular, Part 5, which relates to the progression of Supplementary Planning Documents to adoption.

Public participation is covered within the Regulations at paragraph 12, and a local planning authority before it adopts a Supplementary Planning Document, is required to prepare a statement setting out:

- (i) the persons the local planning authority consulted when preparing the Supplementary Planning Document;
- (ii) a summary of the main issues raised by those persons; and
- (iii) how those issues have been addressed in the Supplementary Planning Document

This information along with the Supplementary Planning Document must be available for a period of not less than 4 weeks before the document is adopted.

The SPD can be viewed on the Councils' website and is available to view at the following offices:

Civic Offices, Union Street, Chorley, Lancashire PR7 1AL

Monday – Friday 8.45am -5.00pm

The Draft Supplementary Planning Document was subject to a consultation process between 31st March and 12th May 2014.

Approximately 1,500 organisations/individuals were consulted, which included planning consultants/solicitors; housebuilders; businesses; charities; interest groups; councils/parish councils; councillors; government departments etc. Given that the list is extensive it is not proposed to reproduce it in full within this statement however, the full list can be supplied on application to the Council.

Eighteen responses were received in relation to the consultation. A summary of the responses along with comments as to how the document has been amended to take account of the responses forms Appendix 1 of this statement.

Appendix 1 – Summary of Representations and Responses

ID	Organisation	Support/ Object	Comments	Councils Response
1	English Heritage	Support with amendments	<p>Happy to see that the historic environment has been considered in the SPD. If not already, we recommend seeking advice from the local authority conservation officer and appropriate archaeological staff.</p> <p>You should have regard to the NPPF and the Practice Guide accompanying PPS5 which sets out the Government policy on conserving heritage assets and utilising the historic environment in creating sustainable places.</p> <p>As a whole the SPD is thorough in its requirements for the assessment of renewable energy applications in terms of designated heritage. One gap is the assessment of non-designated heritage assets. We would expect renewable energy schemes to consider the potential impacts which proposals might have upon those heritage assets which are not designated, defined in the NPPF as 'a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest.' These ought to be included as heritage assets designated or otherwise as they are valuable components of the historic environment. One way to address this issue in the SPD might be to have a heritage section similar to the ecology section for each of the renewable energy types and describe possible impacts and necessary adjustments.</p>	<p>SPD PARTLY AMENDED</p> <p>As part of production of the SPD the Council's Conservation Officer was consulted. As part of the consultation on the Draft SPD, Lancashire County Council Archaeology Service was consulted but did not make any comments.</p> <p>Regard was given to the NPPF and other relevant guidance when preparing the SPD.</p> <p>Heritage is covered within the 'Sites with Statutory Protection' section for each technology. This refers to national, county and local heritage assets. Paragraph 7.41 of the emerging Local Plan refers to the Lancashire Historic Environment Record which includes all the heritage sites designated in the Local Plan as well as more than 1,800 other known heritage assets in the Borough. The SPD has been amended to include reference to this in the Wind Turbine, Solar Power and Hydropower sections of the SPD (paragraphs 47, 100 and 141) and such applications will be required to assess the impacts of the proposal on all heritage assets identified in the Record, both designated and non-designated.</p>
2	Natural England	Support	<p>We are in agreement with the conclusion and screening outcome that the SPD will not trigger the need for an SA/SEA.</p>	<p>NO CHANGES MADE</p> <p>Comments noted.</p>

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3	Highways Agency	Support with amendments	We have no comment to make other than advise you of our policy requirements to protect the integrity of the strategic road network with regard to the installation of wind turbines. Our policy was updated last year and provides that 'in order to mitigate the risks to the safety of road users arising from the structural or mechanical failure, the Highways Agency will seek a minimum setback from the highway boundary of height + 50m or height x 1.5m, whichever is the lesser.' You may therefore wish to review paragraph 54.	<p>SPD AMENDED</p> <p>Paragraph 54 (now paragraph 55 in the final SPD) has been amended to reflect the updated policy.</p>
4	Heskin Parish Council	Object	Heskin Parish Council has considered this document and has resolved to object to wind turbines of any sort in Heskin parish area.	<p>NO CHANGES MADE</p> <p>Comments noted. The Parish Council objects in principle to wind turbines. Core Strategy Policy 28 has been found sound and the Core Strategy adopted. Applications will be determined in accordance with the Development Plan, including Core Strategy Policy 28, and relevant material considerations and the permitted development regime will enable domestic scale wind turbines to be erected.</p>
5	RSPB	Support with amendments	Wind Turbines - Para 33, page 4 - We would like to point out in relation to this paragraph that the higher wind speed areas correspond in the west of the Borough to the South West Lancashire Goose Alert Area (GAA), while not designated, this area is identified by both ourselves and the Wildlife Trust. This area supports roughly 12,000 wintering Pink-footed Geese and 900 Whooper Swans every winter and should be considered to be functionally linked to both the Martin Mere and Ribble and Alt Estuaries SPA's, as birds from both sites feed within it. We would like to see an explicit reference to the GAA within your document, possibly the best location for a reference would be within paragraph 58 Ecology on page 7. In relation to wind turbine developments within the GAA we would like to see two years' worth of survey data for any fields known to support wintering birds, to enable an appropriate response from us and to enable you as a planning authority to adequately assess the potential impact of a development on both geese and swans.	<p>SPD PARTLY AMENDED</p> <p>Reference to the GAA has been added to the ecology sections for wind turbines (paragraph 59) and solar power (paragraph 109) and text has been added requiring developers to consult the RSPB if a proposal for a wind turbine/solar power scheme falls within this area. A map of the GAA has been added in Appendix 4.</p>

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			<p>Appendix 2 - Permitted development rights for wind turbines - In relation to the siting of turbines on buildings can we direct you to the Scottish Natural Heritage Guidance Note, Natural England have yet to issue similar guidance, but in relation to wind they usually follow SNH's lead. It states 'Some species of birds such as house martins, swifts, swallows, house sparrows and starling commonly fly close to and nest on or within buildings. The impacts of micro turbines on these birds have not been researched fully but the potential for collision is clearly greater for birds which dwell on or near buildings....to reduce the potential for negative impacts on these bird populations and to avoid introducing a further pressure on existing populations it is therefore recommended that if a micro wind turbine is installed on or near a building it is located to minimise the potential impact on house dwelling birds by locating the turbine as far from regular nest sites as is practical. It would also be advisable to avoid installing a turbine close to nest sites during the breeding season (March-September).'</p> <p>Solar - Para 75, page 10 - We would like to point out that the previously mentioned GAA could be seriously impacted by inappropriately sited Solar Farms, and because of its functional linkage to the SPA's we consider that appropriate ecological surveys must be conducted prior to submission for planning approval as referenced in para 105 on page 13.</p> <p>Biomass - The Biomass section deals only with the impacts on installation of a biomass heating plant and not the impacts of biomass planting. Para 164, page 21 states 'Larger biomass systems should be located in close proximity to a fuel source if possible.' If however these fuel sources include dedicated energy crops - short rotation coppice or miscanthus whether on its own or in combination with a Biomass Power Plant, they can have a detrimental impact on biodiversity, this could particularly be the case with the GAA. We are concerned that environmental damage through biomass planting on areas of semi-natural vegetation or areas that are important for biodiversity should be avoided. We recommend that in the case of any proposals for</p>	<p>The Scottish Natural Heritage Guidance Note is not relevant to planning policies in England. If Natural England produce similar guidance then the SPD will be revised accordingly, and in any event new guidance will be a material consideration in determining planning applications.</p> <p>See response to first paragraph.</p> <p>Text has been added within the 'sites with statutory protection' section of the biomass section providing further guidance requiring that if a large scale biomass plant or biomass planting is proposed in areas important for biodiversity or within, or affecting the setting of, a heritage asset, an assessment of the impact must be undertaken and submitted with the planning application. Proposals for biomass planting in other locations will be assessed in accordance with relevant policies.</p>

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			<p>large scale SRC, the EIA Regulations are used rigorously to prevent planting in unsuitable locations that might be damaging to biodiversity. The RSPB would be concerned about any significant growing of field crops for energy, especially bio-fuels for transport. Energy crop mono-cultures could impact negatively upon feeding and habitat opportunities for birds and other wildlife.</p>	
6	Adlington Town Council	Support	<p>Adlington Town Council welcomes the proposals included in the SPD.</p>	<p>NO CHANGES MADE Comments noted.</p>
7	The Coal Authority	Support with amendments	<p>The planning requirements for wind power and solar power should include the issue of unstable land within their respective text and the tables which summarise the requirements. Both forms of development will require the provision of Coal Mining Risk Assessments in The Coal Authority defined Development High Risk Area. Across the country we are encountering many wind and solar schemes where mitigation and remedial measures are required in order to address land instability and allow the development to go ahead.</p>	<p>SPD AMENDED A section on unstable land has been added to both the wind turbines (paragraph 67) and solar power (paragraph 117) sections requiring developers to submit a Coal Mining Risk Assessment if the proposal is located within a Development High Risk Area.</p>
8		Support with amendments	<p>Page 11 identifying suitable locations - can you insert a suggestion that all new commercial/industrial buildings should make provision for solar panels on their roofs? I believe that in France this is the case. These buildings have a large roof area and if the necessary strengthening is put in place at the building stage it is much cheaper than trying to add it later.</p>	<p>NO CHANGES MADE Core Strategy Policy 27 sets out the requirements for the sustainability of new buildings. Under this policy new industrial buildings are required to achieve a BREEAM rating of 'very good' and install renewable or low carbon energy sources to reduce the carbon dioxide emissions of the predicted energy use by at least 15%. It is not for the Council to dictate which technologies should be installed. It is down to the developer to assess which technology is the most suitable and cost effective for their development.</p>

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9	Blackburn Road and Great Knowley Residents Association	Support with amendments	<p>Page 11 of the document refers to identifying suitable locations. The members of the association feel that before solar farms and wind farms are located in rural areas, consideration should be given to utilising suitable locations in built-up areas. The most obvious of these with regard to solar energy is the roof space of industrial and commercial buildings. These large areas could be fitted with solar panels. We suggest that all new applications for planning permission for large commercial premises should include solar roof panels - not as an option but a prerequisite. The Council should also do as much as possible to persuade owners of already erected buildings to install solar panels as well.</p>	<p>NO CHANGES MADE</p> <p>Roof mounted solar panels are used in built up locations to generate electricity for individual properties. Solar farms and wind farms produce electricity to serve a number of properties and need a large amount of land which is not usually available in built up areas. Paragraph 86 of the SPD states that in the case of solar farms preference should be given to the re-use of previously developed land. Core Strategy Policy 27 sets out the requirements for the sustainability of new buildings. Under this policy new industrial buildings are required to achieve a BREEAM rating of 'very good' and install renewable or low carbon energy sources to reduce the carbon dioxide emissions of the predicted energy use by at least 15%. It is not for the Council to dictate which technologies should be installed. It is down to the developer to assess which technology is the most suitable and cost effective for their development.</p>
10	Barton Willmore (on behalf of RES)	Support with amendments	<p>We are concerned that contrary to the principles outlined in the NPPF, which clearly state that local planning policy and guidance should be positively prepared, justified, effective and consistent with national policy, the SPD introduces a stand-off distance of fall over distance plus 10% to public footpaths and bridleways. Rather than establish a positive policy framework these requirements are considered unnecessary and are likely to impede the development of suitable wind farm sites within the District. The Planning Practice Guidance for Renewable and Low Carbon Energy does not set a minimum distance to be achieved between a footpath or bridleway. Furthermore it states that LPA's 'should not rule out otherwise acceptable renewable energy developments through inflexible rules on buffer zones or separation distances. We consider that the criteria for public bridleways and footpaths as currently worded in the SPD are unjustified and could prevent the development of a wind turbine in an otherwise appropriate location.</p> <p>As currently worded under para 48 of the SPD if a wind turbine is proposed within the setting of, or near to the setting of one of</p>	<p>SPD PARTLY AMENDED</p> <p>The Planning Practice Guidance for Renewable and Low Carbon Energy recommends a safe separation distance between wind turbines and buildings of the fall over distance plus 10%. Whilst it does not refer to footpaths or bridleways, it is considered that for safety reasons this separation distance should also apply to footpaths and bridleways. In April 2013, whilst rejecting a proposed separation distance between houses and wind turbines in a legal challenge to Milton Keynes Wind Turbine SPD, the judge ruled that the proposed separation distances between wind turbines and footpaths and bridleways could be enforced. They proposed a separation distance of fall over distance plus 10% for footpaths and followed the British Horse Society guidance for bridleways of three times the overall height of the turbine or 200 metres, whichever is the greater. This is significantly greater than that proposed in Chorley's SPD. The separation distances are therefore considered acceptable.</p> <p>Paragraph 48 (now paragraph 49 in the final SPD) has been amended to only require an assessment of the impact of a</p>

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			<p>the heritage assets listed, an assessment of its impact on the asset must be undertaken and submitted with the planning application along with details of how any identified negative impacts have been mitigated. This is considered unnecessary and contrary to national policy. The NPPF does not require applicants to consider the impact of proposals near to the setting of a heritage asset only the level of harm through the alteration or destruction of the heritage asset or development within its setting. To be consistent with the NPPF the SPD should be revised to ensure that when required heritage assessments are focussed on assessing the significance of effects within the setting of a heritage asset. The NPPF also stresses that the level of assessment should be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on their significance. The SPD should be revised to ensure that the level and scope of the assessment is proportionate to the scale of the proposed development.</p> <p>The SPD fails to recognise that the level of disturbance caused by shadow flicker depends on a multitude of factors including the observers distance from the turbine, the direction of the dwelling and the orientation of its windows and doors from the wind turbine, the frequency of the flicker and the duration of the effect, either on any one occasion or averaged over a year. Therefore given these variables it is likely that in many cases the level of effect is considered to be so low that mitigation measures are not required. As it is clearly unreasonable to expect applicants to totally eliminate effects which are not considered to be significant, para 66 of the SPD should be revised as follows: 'Where a proposal could give rise to shadow flicker, the analysis must quantify the impact and where necessary propose mitigation measures to reduce the effects to an acceptable level.'</p>	<p>wind turbine on a heritage asset if it is proposed within, or affects the setting of the heritage asset. Reference has also been made to the assessment being proportionate to the assets importance. Paragraph 102 in the solar power section and paragraph 143 in the hydropower section in the final SPD have also been amended.</p> <p>The SPD states that the problems caused by shadow flicker are rare and the likelihood of it occurring will depend on a range of factors. Paragraph 66 (now paragraph 69 in the final SPD) has been amended as requested.</p>
11	Environment Agency	Support	We are pleased to see the reference to the requirement to consult the Environment Agency with regard to proposals for hydropower. We concur with your conclusions that SA/SEA of the proposed SPD is not required.	<p>NO CHANGES MADE</p> <p>Comments noted.</p>

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12	National Trust	Support with amendments	<p>Overall the National Trust welcomes this SPD as a helpful addition to the Councils' suite of planning policy documents and the specific supplementary advice on an important and often contentious area.</p> <p>Para 6 - it would be helpful if, as with sections on the Central Lancashire Core Strategy and Local Plan, some consideration was given to the wider context of national planning policy by reference to the overall approach to achieving sustainable development and related advice on matters such as nature conservation and heritage in the NPPF.</p> <p>Para 36 - It is suggested that in the first sentence it would be better to refer to appropriate rather than acceptable uses having regard to the terminology used in the NPPF and related documents in respect of Green Belt policy.</p> <p>Para 37 - the highlighted areas where there can be negative impacts should be expanded to make specific reference to cultural heritage (whilst the impacts here may most often be visual this is not exclusively the case e.g. noise impacts upon tranquil settings of heritage assets and direct impacts from engineering works on archaeological resources).</p> <p>Para 48 - the advice here is helpful, however it is noted impacts upon settings, especially as a result of major wind turbine developments, can be quite extensive - cases of material impacts at 11km have been cited on appeal. A supplementary statement to the effect that impacts upon settings need to be assessed over a reasonably extensive area, in part but not solely dependent upon the scale of the turbines proposed would be useful.</p> <p>Paras 49-51 - it is noted that areas enjoyed for their tranquillity, including locations such as waterways and parklands, are also sensitive to noise impacts.</p> <p>Para 86 - same comment as in response to para 36 above.</p>	<p>SPD PARTLY AMENDED</p> <p>Comment noted.</p> <p>It is not considered necessary to provide information on the wider context of national planning policy in the SPD as this is contained in the Local Plan and Core Strategy.</p> <p>Paragraph 36 has been amended to use the term appropriate instead of acceptable. Paragraph 86 (now paragraph 89 in the final SPD) in the solar power section and paragraph 132 in the hydropower section have also been amended.</p> <p>Paragraph 37 has been amended to also refer to cultural heritage.</p> <p>Paragraph 48 (now paragraph 49 in the final SPD) has been amended as requested to refer to the impacts on settings being assessed over a reasonably extensive area. The solar power (paragraph 102) and hydropower (paragraph 143) sections have also been amended.</p> <p>Comment noted.</p> <p>See response to paragraph 36 above.</p>

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13	Lancashire County Council	Support with amendments	In general, I am supportive of the SPD. I would just like to make one suggestion. As energy from waste is also a low carbon energy stream, it might be beneficial for the SPD to demonstrate its use.	<p>SPD AMENDED</p> <p>Reference to anaerobic digestion has been added to the biomass section (paragraph 156).</p>
14	NFU	Support with amendments	<p>On the whole it appears that the Council has covered all aspects of renewable and low carbon energy. Farms are often best places within rural communities to provide renewable and low carbon energy so we are pleased that you have included this as a SPD.</p> <p>Page 7, points 60-62 - it asks for evidence of consultation with NATS and MOD to be submitted with the planning application. However this is impossible as the pre-consultation services from these bodies has been withdrawn, the only time they provide an answer is on request from an LPA after the full planning application has been submitted.</p> <p>It may also prove beneficial to provide a business case for each application as a benefit for the scheme, as a lot of the information requested is often deemed negatively against the scheme. Some of these schemes can bring jobs to the area, meet renewable energy targets, improve the rural economy and reduce carbon outputs. Each case should be judged by its own merits on a site by site basis, and a full justification given for objections and where appropriate scientific evidence.</p>	<p>SPD PARTLY AMENDED</p> <p>Comment noted.</p> <p>Both NATS and the MOD have confirmed that they offer a pre-planning assessment service. The MOD temporarily stopped providing this service but resumed in November 2013. The SPD has been amended to state that this consultation is encouraged rather than mandatory. If a developer chooses not to undertake this consultation then NATS and/or the MOD may object to the proposal when consulted by the Council.</p> <p>All planning applications will be determined in accordance with the Development Plan, including Core Strategy Policy 28 and the SPD. Core Strategy Policy 13 deals with the rural economy. Any further information submitted as part of a planning application will be taken into consideration.</p>
15	Central Lancashire Friends of the Earth	Support with amendments	<p>We are encouraged by the overall positive approach to renewable and low carbon energy expressed in the document. We believe that on-shore wind energy is efficient, quick to install and is the cheapest of the renewable energies.</p> <p>Requirements for permitted development, suitable location, EIA and issues related to planning are set out clearly, fairly and in</p>	<p>NO CHANGES MADE</p> <p>Comment noted.</p> <p>Comment noted.</p>

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			<p>detail. We accept that all renewable energies, as with any form of development, need to be examined carefully but impartially and judged on individual merits. We are pleased to read that where there may be a potential problem, for example with shadow flicker from a turbine blade, there can be acceptable solutions.</p> <p>With reference to solar power, there does appear to be a lot of emphasis upon adverse visual impact and significant impacts upon the character and quality of the landscape. Perhaps this could be counterbalanced by a statement saying how quickly panels can be erected and dismantled if no longer required. Perhaps too the economic benefits could be given more depth, the benefits to the farming community and small businesses can be considerable in times of increasing energy costs.</p> <p>Regarding biomass energy, we believe that bio-energy has a role to play in bringing down greenhouse gas emissions but only if it is done in a way that protects wildlife, people's livelihoods and guarantees emission cuts. It is vital to distinguish between different forms of energy based on their real carbon impacts.</p> <p>In relation to solar energy, a statement by Jonathan Scurlock, Chief Renewable Energy Adviser at the National Farmers Union, stated: 'Solar farms are not any kind of threat to agricultural land because they allow dual use, either biodiversity, which is increasingly required, or livestock grazing - the diversification can be really important in making the business sustainable.'</p>	<p>It is accepted that renewable and low carbon energy has many benefits and such schemes are encouraged in the Borough provided they do not have unacceptable impacts and are in accordance with the Development Plan, including Core Strategy Policy 28 and the SPD. Other Core Strategy policies address matters of economic benefits such as Policy 13 which deals with the rural economy. It is not considered necessary to list all the benefits. The purpose of the section of the report referred to is to set out the planning issues associated with solar power schemes and identify how any potential issues can be overcome so that the proposal is acceptable.</p> <p>The SPD addresses the issues associated with biomass such as landscape and visual impact and impact on sites with statutory protection.</p> <p>Comment noted.</p>

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16	Wildlife Trust	Support with amendments	<p>Para 32 - this should make it clear that any proposal that would impact on a site of wildlife importance would require an environmental statement. However it is covered in a way under para 58.</p> <p>Paras 43-48 - should we ask them to include the reference to the hierarchy of avoidance, reduction, mitigation and compensation?</p> <p>Paras 56-58 - I haven't found any reference in the wind turbine section to hydrology which can be a major issue, particularly where more than one or 2 turbines are involved.</p> <p>Paras 75, 79 & 83 - This section of the SPD needs to make some reference to consideration of the ecology of the site.</p>	<p>NO CHANGES MADE</p> <p>Paragraph 58 (now paragraph 60 in the final SPD) requires an ecological survey to be submitted with all planning applications for wind turbine schemes assessing any potential impacts. This will include the impact on sites of wildlife importance.</p> <p>No details have been provided on the hierarchy of avoidance, reduction, mitigation and compensation and how this could be incorporated into the SPD, nor why.</p> <p>No details have been provided on what information relating to hydrology should be included in the wind turbine section of the SPD, nor why.</p> <p>Ecology is covered in a separate section.</p>
17	Anderton Parish Council	Support with amendments	<p>Para 20 onwards - there needs to be a better and clearer definition of terms regarding wind turbines and an acknowledgement that there are various types, principally horizontal and vertical axis types. A horizontal axis type will consist of a mast and a rotor. The rotor will consist of a hub and usually 2, 3, 4 or 5 blades. Avoid the use of the term blade diameter. Height should be specified as either hub height or overall height. A vertical axis type may also consist of a mast and rotor but with the rotor mounted on the extended axis of the mast. There are various types of rotor construction varying in length and diameter as with horizontal types and should be uniquely specified.</p> <p>Para 53 - safe separation distances appears to be linked to the overall height of the turbine. A planning consideration for safety should be consideration of the safety case of blade failure and potential impact zone around the turbine. A safe distance would need to be defined in terms of the energy contained by a shed blade and energy decay over the trajectory path.</p>	<p>SPD PARTLY AMENDED</p> <p>Reference has been made in paragraph 21 to the different types of wind turbines. Reference has also been made to overall height in paragraphs 21-23. The term rotor diameter is commonly used and is specifically referred to in the Planning Practice Guidance for Renewable and Low Carbon Energy in relation to consultation with the MOD.</p> <p>The separation distance between wind turbines and buildings is taken from the Planning Practice Guidance for Renewable and Low Carbon Energy. The height of the turbine plus 10% is considered a safe distance and is referred to as the fall over distance.</p>

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			<p>Para 69 - there appears to be an assumption that the working fluid in a solar water heating system is pure water. It seems likely that in order to cater for freezing conditions some other solution will be required and the solution will be required and the system not directly linked to the domestic hot water circuit. A planning consideration should include the working fluid to be used and any environmental impact of leakage.</p> <p>Para 155 onwards - a planning requirement for biomass should be the consideration of the environmental impact of smoke emissions and smokeless zones (if still current policy). It would be useful to have an assessment of local wind conditions and likely smoke dispersal as part of the planning requirements.</p> <p>Para 166 - as with para 69 above a planning requirement for Ground Source Heat Pumps should be consideration of the working fluid and the potential environmental/ecological/safety impact of any leakage.</p>	<p>The fluid used in a solar water heating system is not a planning consideration. Any leakage would be contained within the property and would not have any environmental impact.</p> <p>As stated in the SPD, if wood is used in a biomass system only the carbon that has been absorbed by the wood is released. If trees are replanted to replace the ones used, the new trees will absorb the equivalent amount of carbon used. Energy crops also produce little carbon.</p> <p>Information has been added to the ecology section of the heat pumps section of the SPD stating that closed loop Ground Source Heat Pump systems should use non-hazardous substances to avoid pollution of groundwater in the event of a leak. If leaks occur the Environment Agency can serve notices to prohibit the discharge or require a permit.</p>
18	Bretherton Parish Council	Support	Bretherton Parish Council supports the contents of the SPD.	<p>NO CHANGES MADE</p> <p>Comments noted.</p>