



**AGENDA ITEM: 5(g)**

**CABINET: 17<sup>th</sup> September 2013**

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**Report of: Assistant Director Planning**

**Relevant Managing Director: Managing Director (Transformation)**

**Relevant Portfolio Holder: Councillor M Forshaw**

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**SUBJECT: SUSTAINABLE ENERGY STRATEGY**

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Wards affected: Borough wide

**1.0 PURPOSE OF THE REPORT**

- 1.1 To present the final draft of the Council's Sustainable Energy Strategy, intended to assist in the delivery of carbon reduction and improved sustainability across the Borough.
- 1.2 To inform Members of the responses received during the consultation process and how they have been addressed in the revision of the document.

**2.0 RECOMMENDATIONS**

- 2.1 That Cabinet the Sustainable Energy Strategy appended to this report be approved and adopted.
  - 2.2 That delegated authority be given to the Assistant Director Planning, in consultation with the Portfolio Holder Planning and Development, to assist in the delivery of the Strategy.
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### **3.0 BACKGROUND**

- 3.1 The Sustainable Energy Strategy aims to assist in the delivery of carbon reduction across West Lancashire. It seeks to highlight the work that's already ongoing in the Borough, identify specific areas to tackle further and present action plans on how we intend to achieve this.
- 3.2 A draft Sustainable Energy Strategy was brought to Cabinet and approved for public consultation in February 2012. Since this time the document has been thorough the consultation process and revised, taking all comments into consideration.

### **4.0 CONSULTATION**

- 4.1 The Strategy went out to public consultation for a four week period in March/April 2013, utilising local media promotion and direct mail contacts. 34 representations were received during the consultation process. 21 of these submissions were received from individual residents and 13 were received on behalf of organisations, namely Parish Councils, community groups and environmental campaign groups. Overall, the consultation process highlighted some excellent additional points and further actions for investigation and has resulted in minor changes to the draft document. A full summary of the representations received during the consultation process can be viewed in Appendix 2 of this report.
- 4.2 The majority of comments received were in relation to the renewable energy section (chapter 3.0) of the Strategy. A substantial number of responses expressed concerns regarding wind turbine developments and requested stronger local policies are required to prevent their siting in areas designated as Green Belt, areas of landscape importance or near residential areas.
- 4.3 It should be noted that the Strategy encourages the use of all renewable technologies and makes reference to national and local planning policies, but it is not itself a planning policy or supplementary planning document. The suitability of technologies must be considered in balance with landscape sensitivity and the understanding that some locations lend themselves to some technologies better than others. With regards to wind turbine developments, the National Planning Policy Framework (NPPF) and planning policies in the emerging Local Plan are in place to ensure that adverse impacts are properly addressed and are balanced with the long term environmental benefits of renewable energy. The intended role of this strategy document is to help develop ways to reduce carbon emissions in the Borough.

### **5.0 SUSTAINABILITY IMPLICATIONS/COMMUNITY STRATEGY**

- 5.1 The Sustainable Energy Strategy will help to develop stronger communities through the delivery of local energy projects and help to improve health and well being as we work to reduce fuel poverty and provide affordable warmth for all. It will also contribute to sustainable development by encouraging the wise use of natural resources and help to enhance a green economy through renewable energy generation and local delivery of the Green Deal.

## **6.0 FINANCIAL AND RESOURCE IMPLICATIONS**

- 6.1 There are no financial implications arising from this report or adoption of the Sustainable Energy Strategy. Any financial requirements to enable delivery of a carbon reduction project or progress an action within the Strategy will be considered independently and, where required, brought before Cabinet for approval.
- 6.2 Implementation of the action plans within the Strategy will require staff time, however this can be covered within existing resources.

## **7.0 RISK ASSESSMENT**

- 7.1 Central Government requests Local Authorities measure and report greenhouse gas emissions associated within their own operations on an annual basis and report their figures on their Council website. This year West Lancashire Borough Council has reported a 27% reduction on our 2006/07 baseline, exceeding our target 25% reduction by 2020.
- 7.2 DECC produce yearly reports regarding Borough wide emissions but there are no legal requirements or financial penalties should the Council fail to meet carbon reduction targets or Climate Local commitments. There could be a reputational risk should we not be seen to be actively working to help reduce carbon emissions and tackle fuel poverty across our area.
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### **Background Documents**

There are no background documents (as defined in Section 100D(5) of the Local Government Act 1972) to this Report.

### **Equality Impact Assessment**

There is a direct impact on members of the public, employees, elected members and / or stakeholders. Therefore an Equality Impact Assessment is required. A formal equality impact assessment is attached as an Appendix to this report, the results of which have been taken into account in the Recommendations contained within this report

### **Appendices**

1. Equality Impact Assessment
2. Summary of Consultation Responses
3. Sustainable Energy Strategy

## Appendix 1: Equality Impact Assessment - process for services, policies, projects and strategies

<p>1. Using information that you have gathered from service monitoring, surveys, consultation, and other sources such as anecdotal information fed back by members of staff, in your opinion, could your service/policy/strategy/decision (including decisions to cut or change a service or policy) disadvantage, or have a potentially disproportionately negative effect on, any of the following groups of people:  <i>People of different ages – including young and older people</i>  <i>People with a disability;</i>  <i>People of different races/ethnicities/ nationalities;</i>  <i>Men; Women;</i>  <i>People of different religions/beliefs;</i>  <i>People of different sexual orientations;</i>  <i>People who are or have identified as transgender;</i>  <i>People who are married or in a civil partnership;</i>  <i>Women who are pregnant or on maternity leave or men whose partners are pregnant or on maternity leave;</i>  <i>People living in areas of deprivation or who are financially disadvantaged.</i></p>	<p>No.</p> <p>Actions within the Sustainable Energy Strategy will have a positive effect on all groups; however in some areas, primarily with regards to accessing Government funding, some groups are given priority over others e.g. the elderly and those on benefits. These are national eligibility criteria and can not be controlled locally.</p>
<p>2. What sources of information have you used to come to this decision?</p>	<p>Government eligibility criteria for ECO funding.</p>
<p>3. How have you tried to involve people/groups in developing your service/policy/strategy or in making your decision (including decisions to cut or change a service or policy)?</p>	<p>The Strategy has been through a public consultation process. The Strategy was open to comments for a period of 1 month and promoted through local PR channels. I also attended Parish Council meetings and made direct contact with relevant groups/organisations.</p>
<p>4. Could your service/policy/strategy or decision (including decisions to cut or change a service or policy) help or hamper our ability to meet our duties under the Equality Act 2010? Duties are to:-  <i>Eliminate discrimination, harassment and victimisation;</i>  <i>Advance equality of opportunity (removing or minimising disadvantage, meeting the needs of people);</i>  <i>Foster good relations between people who share a protected characteristic and those who do not share it.</i></p>	<p>No.</p> <p>The Strategy promotes community action from those who have a collective interest in energy reduction. This may result in communities taking action e.g. those who reside in properties which are hard to treat or located off the gas grid.</p>
<p>5. What actions will you take to address any issues raised in your answers above</p>	<p>N/A</p>

## Appendix 2: Summary of Consultation Responses

INDIVIDUAL REPRESENTATIONS				
No.	Respondent	Chapter	Comment/Issues	Response/comment/action
1	Mrs Alison Rees, Wrightington resident	Renewable Energy	Requested that statements from both West Lancashire local policy and central government policy be regarded as significant with regards to wind turbine development, including NPPF, Local Plans and the Wind Turbines (Minimum Distances from Residential Premises) Bill.	<p>Both the current and emerging Local Plans contain planning policies on wind turbines. The new Local Plan 2012-2027 has been produced in line with the National Planning Policy Framework (NPPF) guidance which requires Local Planning Authorities to have a positive strategy to promote energy production from renewable sources, while ensuring that adverse impacts are addressed satisfactorily. Whilst this Strategy document encourages the use of all renewable technologies and makes reference to national and local planning policies, it should be noted that it is not itself a planning policy document</p> <p>The Council doesn't currently have any intention to utilise the Wind Turbines (Minimum Distances from Residential Premises) Bill to introduce a minimum separation distance policy. The Bill hasn't been progressed since its second reading in the House of Lords in June 2011 and consequently there are currently no minimum separation distances in English planning law. It may therefore be considered to be at odds with the intentions of the NPPF to introduce this in policy.</p>

2	P. Banks, Appley Bridge resident	Renewable Energy	Support for renewable energy alternatives to wind power e.g. solar energy. Concern over turbine height and blade length required to achieve greater efficiencies and the impact this would have on landscape.	It's agreed that there will need to be great diversity of renewable energy technologies and schemes utilised at a wide variety of sites and locations to meet national renewable energy generation targets. It's also agreed that the suitability of technologies must be considered in balance with landscape sensitivity and the understanding that some locations lend themselves to some technologies better than others. With regards to wind turbine developments, planning policies are in place to ensure that adverse impacts are addressed satisfactorily taking into consideration the size of any proposed turbine.
3	Mr. David Young, Wrightington resident	Introduction	Agree in principle with the overall strategy objectives.	Support noted.
		Renewable Energy	The renewable energy generation targets place far too great a dependence on wind generated energy. Strongly against turbine development harming green belt land and distracting from the visual amenity of the landscape, influencing the quality of the environment and the lives of residents, in contrary to Council policies. Supports alternative renewable energy technologies and supports a balance between low carbon energy and protecting the special character of the landscape.	The NPPF and Policy EN1 of the emerging Local plan 2012 - 2027 indicate that proposals in the Green Belt will need to demonstrate how the benefits of the proposal outweigh the harm to the Green Belt whilst ensuring any adverse impact on local amenity are satisfactorily addressed. The NPPF does place significant weight on the long term carbon reduction benefits provided by renewable technologies, which must be considered against the relatively short term impacts of a 20 year structure. However, it is agreed that there needs to be a balance achieved through utilising a range of renewable energy technologies and protecting our landscape history and character.
4	Mrs Yvonne Young,	Introduction	Agree in principle with the overall strategy objectives.	Support noted

	Wrightington resident	Renewable Energy	The renewable energy generation targets place far too great a dependence on wind generated energy. Strongly against turbine development harming green belt land and distracting from the visual amenity of the landscape, influencing the quality of the environment and the lives of residents, in contrary to Council policies. Supports alternative renewable energy technologies and supports a balance between low carbon energy and protecting the special character of the landscape.	As part of the evidence base for the new Local Plan, West Lancashire was included in 2 separate studies to investigate the Boroughs capacity to deliver renewable energy. Whilst the studies used differing methodologies. Both concluded that West Lancashire could generate the highest output of renewable energy through wind turbine developments, however both studies did arrive at this conclusion looking at what is technically deliverable rather than what is viable and the Strategy has been amended to explain this.
5	Mr. Bill Ainscough, Wrightington resident	Introduction	Sustainable Energy Strategy is welcomed and, subject to comments, strongly supported.	Support noted
		Residential	Strongly supports the objectives. Recommended suggested wording to place more emphasis on the importance of retro-fitting.	Agreed and included.
		Renewable Energy	Agree and support emphasis of an integrated approach to carbon reduction. Suggests amendment to Objective 3 'To increase <i>appropriate</i> renewable energy generation'. More clarification required on the findings of the renewable energy capacity studies, with removal or updating of the generation targets table and areas of least constraint	Whether a development is deemed appropriate or not is a planning issue, should permission be required. Its agreed greater clarification on the findings of the Capacity study was required and this has been included.
			Recommends recognition that impact on landscape is a primary consideration for wind turbine development and the identified area of least constraint is referred to in section 3.5.	It is felt that the Strategy already recognises landscape impact as a primary consideration, along with the other listed issues. Reference to the area designated of least constraint in this chapter is not suitable as this area refers only to large scale wind turbine developments.
	Requests development of an indicative plan identifying areas considered to be generally suitable for the provision of wind energy generation and the inclusion of wind energy generation case studies	There are no plans to undertake further work to identify areas suitable for wind turbine installation as each application needs to be assessed on its own merits, depending on the proposed location and scale of the turbine,.		

		<p>It is recommended that Table 3.2.2 is removed or updated as it is considered misleading. If the table remains within the document, text should be included to appropriately reference and provide action within the Strategy to recognise the significant advances in alternative technologies since the Strategy was produced e.g. improved commercial viability of solar PV</p>	<p>It's agreed that table 3.2.2 did require further explanation to avoid misinterpretation. It is also agreed that the results will date quickly as technologies advance. It is for this reason that the proposed targets have not been included in the emerging Local Plan, which sets out a 15 year plan for the Borough. However, it was felt appropriate to include in this Strategy, which can be reviewed and updated should further work be undertaken.</p>
		<p>Requests inclusion of stronger wording regarding the impacts wind turbine developments could have on landscape, as provided by the Landscape Character SPG 'tall columnar constructions should be avoided, as should uncharacteristically or visually intrusive development, or development which interferes with long distance views from high points accessible to the public'.</p>	<p>Whilst this guidance provides a useful context for the consideration of planning applications, it does not provide strict criteria which all proposals must meet in order to be considered acceptable in planning terms. Individual proposals must be considered on their own merits, within the specific local context and must have regard to the wider Development Plan. This is made up of Local Plan policies, the emerging Local Plan policies and the National Planning Policy Framework (NPPF). It is the role of the planning system, through consideration of all of this guidance, to assess planning applications, including those for wind turbines, and to balance the impacts of each proposal with the benefits.</p>
	Sustainable Development	<p>Requests removal of reference to require developers to meet requirements of Policy EN1 of the Local Plan, including the district heating policy as this is a draft document and yet to be tested through consultation.</p>	<p>Policy EN1 has been under scrutiny by a Planning Inspector over recent weeks. The Policy has been found sound and shall remain in the Strategy and Local Plan.</p>
		<p>Supports the objective to encourage sustainable development but suggests any proposals for district heating should come from developers rather than result from council led proposals.</p>	<p>Planning authorities are being encouraged to support and promote the delivery of infrastructure for district heating, to help developers achieve future building regulations targets.</p>
	Green Communities	<p>Suggests adopting a more pragmatic approach to district heat networks, differentiating between retrofitting solutions and more complex networks.</p>	<p>Noted</p>



		Sustainable Development	Supports proposed Local Plan Policy EN1 but disagree with the requirement that all major developments explore district heating, stating that a blanket approach is inappropriate and could waste resources that could be used on viable sustainable development measures. The disadvantages of district heating, most notably in terms of commercial viability, should also be discussed, and suggests that reference to this policy is removed until it becomes adopted Council policy.	The emerging Local Plan 2012-2027 has recently been scrutinised by the Planning Inspectorate, who supported the proposed policies. If a developer is able to prove that a district heating scheme is unviable and a satisfactory standard of sustainability can be achieved by other means this will be acceptable.
			Support for the implementation of an Allowable Solutions Fund following the introduction of a zero carbon standard, to allow developers to pay a levy if they don't meet the standard, which can then be utilised to improve environmental performance of existing homes, which would fit with the Strategy's recognition of the importance of retrofitting.	Support noted.
		Business and Industry	Agree with and support content of these section	Support noted.
		Transport	Agree with and support content of these section	Support noted.
6	Mr. Andrew Porter, Wrightington resident	Renewable Energy	The renewable energy generation targets place far too great a dependence on wind generated energy, which can't be relied upon and will have an effect on the National Grid distribution system. Supports a greater contribution from other renewable technologies which work alongside wind turbines. Also highlights green belt considerations and the impact turbines have on the landscape, in comparison with other technologies such as wind turbines.	Addressed above.

7	Bev Barnes, Heskin resident	Renewable Energy	Objection to wind turbine developments. Supports alternatives that have less visual impact on the area. Council should be protecting the landscape of the Borough. States NPPF and local policy against inappropriate development that's harmful to green belt.	Addressed above.
8	J.J. Ainscough, Ainscough Building Supplies, Wrightington	Renewable Energy	The renewable energy generation targets place far too great a dependence on wind generated energy, which have a large impact on the landscape causing great loss on visual amenity. Support for other sustainable technologies that have very little impact on landscape.	Addressed above.
9	Mrs Christine Birchmore, Resident	Renewable Energy	Support for renewable energy technologies such as solar PV and air source heat pumps being used to reduce fuel poverty.	Agreed and included.
			Objection against wind turbines blotting the landscape. Development in Green belt should be kept to an absolute minimum.	Addressed above.
10	Mr. Geoff Birchmore, Wrightington resident	Renewable Energy	Strong objection to wind turbine development in green belt and agricultural areas. Highlights considerations including impact on the landscape, noise, shadow flicker and the impact on migrating birds and aircraft.	Addressed above.
			Support for alternative renewable technologies being utilised and associated income generation used as a contribution towards projects to alleviate fuel poverty and hard to treat homes.	Agreed and included.
11	Mr. Ben Hughes, Wrightington resident	Renewable Energy	Objection to wind turbine development in the Green belt due to impact on landscape from an unreliable technology.	Addressed above.

12	Dr. E Gradwell, Wrightington resident	Renewable Energy	Supports consideration of alternative forms of renewable energy other than wind turbines, which don't cause health risks and loss of visual amenity.	Addressed above.
13	Mrs M Gradwell, Wrightington resident	Renewable Energy	Supports consideration of alternative forms of renewable energy other than wind turbines, which don't cause health risks and loss of visual amenity.	Addressed above.
14	Mr. Chris Byron, Aughton resident	Renewable Energy	Objection to wind turbine development due to well documented health issues. Requests consideration of a policy prescribing separation distances from turbine to residential dwelling, varying with height of turbine. Sole reliance on desk-bound assessments is not sufficient.	Addressed above.
15	Ms. Kierstan Boylan, Wrightington resident	Introduction	The overall Strategy seems acceptable.	Support noted.
		Renewable Energy	Emphasis that renewable energy sources should be steered towards solar panels and other alternative technologies to wind turbines. Wind turbines destroy visual amenity and the lifestyles of families who live in the vicinity, and are inappropriate development in green belt. Secondly, wind power is not reliable and causes problems for the national grid.	Addressed above.
			Strongly object that 92% of the Boroughs contribution to renewable energy targets will be generated by onshore wind. Support to reduce the number of wind turbines and ensure sustainable alternatives are available.	Addressed above.
16	Mrs Karen Colins, Wrightington resident	Renewable Energy	Strategy places too much dependence on wind generated energy that has the most significant impact on landscape. There needs to be greater contribution from other technologies to achieve acceptable balance. Wind power is not reliable and causes problems for the National Grid.	Addressed above.

			NPPF and local policy against inappropriate development that's harmful to green belt and states avoidance of tall columnar constructions.	Addressed above.
17	Mr. Joe Gray, Resident	Residential	Proposes the Council should run a service to provide thermal imaging surveys for householders, on their request, to help identify heat loss occurring in their property.	The Council does own a thermal imaging camera that is used to identify heat loss and insulation requirements on Council owned housing stock. Offering this as a service for private homeowners is something that we could investigate. The Council did undertake a 'Hot Lofts' thermal imaging survey of the Borough by helicopter in 2011, however the results of which must be used with caution due to influencing factors such as occupation and heating at the time of survey.
		Renewable Energy	Council to provide independent information and financial advice on savings to be made from installing solar roof panels	An advice service is available provided by the Environmental Strategy Officer. Other independent advice sources are also available from organisations such as the Energy Saving Trust. Contact details provided within the Strategy.
18	Mrs Susan Lace, Resident	Residential	Support works to encourage householders to insulate their homes effectively and use low energy equipment where possible.	Support noted.
		Renewable Energy	Supports the use of renewable technologies that pose very little impact on the landscape e.g. solar panels and ground source heat pumps.	Support noted.
			Objection to the introduction of wind turbines which have a detrimental effect on large areas. Green belt should be protected. Wind turbines are inappropriate close to residential properties.	Addressed above.

19	Mr Stuart Watt, Wrightington resident	Renewable Energy	Request for the inclusion of a policy to further protect and safeguard the landscape in West Lancashire, especially those areas designated to be of county or local importance in terms of landscape history, as designated in the existing Council SPG.	The existing SPG referred to is still given significant weight in planning decisions. Despite the age of the document the Council considers the document to still be broadly applicable given the lengthy time period associated with significant landscape change. The Council does intend to produce Supplementary Planning Guidance to accompany the renewable energy chapter of the emerging Local Plan. This will aim to provide further guidance to both planners and developers, in line with the NPPF national guidance, however given the current stage of the new Local plan, development if this document is not imminent.
20	Mr Mark Calland, Wrightington resident	Renewable Energy	Requests consideration of the 'Distances to Residents Properties Bill' in the Strategy for referral when considering wind turbine applications	Addressed above.
21	Ms Megan Rees, Wrightington resident	Renewable Energy	Objection against wind turbine development within West Lancashire greenbelt. Reference to the Councils Greenbelt Study and request for a supplementary guidance document to protect our green belt from incompatible wind turbine developments.	Addressed above.

ORGANISATION REPRESENTATIONS				
No.	Respondent	Chapter	Comment/Issues	Response/comment/action
1	Ormskirk and District Friends of the Earth (c/o Frank Kennedy)	Introduction	Sign up to Climate Local.	Action Completed
		Renewable Energy	No mention of solar technology in generation targets. Strategy needs to better promote solar technologies.	It's agreed that solar thermal technologies have an important role to play in reducing our dependence on fossil fuels and achieving renewable energy targets. Solar thermal generation has unfortunately been omitted from the generation targets within the renewable energy capacity study however, as this study was published three years ago regrettably it can't be altered but this comment has been noted for any future works. It's anticipated that the capacity of solar thermal would be similar to solar PV as this contribution was based on number of dwellings and amount of available roof space.
		Sustainable Development	Would like to see higher sustainable energy standards imposed than those in line with building regulations. Wants to see more pressure on developers to use renewable technologies	The Code for Sustainable Homes and BREEAM standards set out in the new Local Plan do go above and beyond the requirements of Building Regulations. Whilst the Council agrees that new developments should be as sustainable as possible, we must also consider the impact such requirements have on the viability of developments. We encourage energy reduction through use of the energy hierarchy, rather than pushing developers to utilise expensive renewable technologies without ensuring a fabric first approach. However, as Building Regulations and Code/ BREEAM levels increase in the next few years, developers will need to utilise renewable and sustainable technologies to achieve the required energy reductions.
		Transport	Would like to see an objective to improve traffic flow through Ormskirk especially around Moor Street/ Stanley Street, to help improve air quality.	The possibility of an Ormskirk by-pass option has been investigated in previous years. Other possible measures are highlighted as part of the West Lancashire Air Quality Action Plan.

2	Gillian Whitfield, WLBC (Planning Policy)	Renewable Energy	Include the finding of the Lancashire Sustainable Energy Study.	Agreed and included.
3	Friends of the Earth North West (c/o Helen Rimmer)	Introduction	Overall support for the Strategy and the seven broad objectives. Recommends inclusion of a comprehensive set of time limited targets to encourage ambition, drive, implementation and commitment e.g. number of homes to be retrofitted.	The green agenda and the various funding mechanisms available to help initiatives such as retro-fitting, installation of micro-generation etc are constantly evolving and changing, making the inclusion of some targets very difficult. The Strategy targets have therefore been set in line with national targets and progress will be reported annually.
		Renewable Energy	Recommends a strong target for renewable energy generation, linked to the Local Plan, to ensure the Borough fulfils its contribution of Lancashire's renewable energy capacity. A policy to support small scale wind power for our farming communities should also be included.	Agreed and included. Small wind turbines in rural communities will be considered in line with the NPPF and local planning policy. As required by the NPPF, the Council has a positive strategy to promote energy from renewable sources, while ensuring that adverse impacts are addressed satisfactorily.
		Green Communities	Welcomes the focus on community based energy efficiency and renewable energy.	Support noted.
		Business and Industry	Recommends the Council conducts an assessment of the risks that possible future commercial development of shale gas production in West Lancashire may have on our rural economy, communities and environment.	The responsibility for planning/ control of this industry lies with Lancashire County Council
		Transport	Transport section is limited. Would like to see more cycle initiatives e.g. cycle lanes and cycling training offers, along with targets driven by number of short journeys made by bike. Car clubs and the provision of electric vehicle charging points are also recommended.	Initiatives such as cycle lanes fall within the responsibility of Lancashire County Council. The Council has previously ran a car sharing club for employees but unfortunately its use did not warrant continued financial spend in this area. We are currently investigating the provision of electric vehicle charging points. Where specific targets are made, they must be SMART and easily measurable. Number of avoided car journeys is not considered to be measurable.

4	Wrightington Residents Against Turbines (WRAT) Group (c/o Karen Collins)	Renewable Energy	<p>The renewable energy generation targets place too much dependence on wind generated energy, which has a significant impact on the landscape. There needs to be a greater contribution from other renewable technologies to achieve a balance between low carbon energy and protecting the special character of the landscape.</p>	<p>Its agreed that there will need to be contributions from a mix of low carbon technologies, if we are to meet renewable energy targets. The renewable energy generation targets are only a guide as to how this can be achieved. The Strategy clearly outlines that proposals for wind turbines will be assessed on their own merits, in line with the NPPF and ensuring consideration is given to impacts on landscape and amenity.</p>
			<p>Existing Council policies, including the SPG: Areas of Landscape History Importance recommending 'the avoidance of tall columnar constructions' should provide a level of protection against wind turbine development.</p>	<p>The Council's Natural Areas and Areas of Landscape Importance Supplementary Planning Guidance (SPG) is one of the planning documents given consideration when determining planning applications that may have an impact on the Borough's landscape, and consequently this is referenced as a consideration for any renewable energy project within the Sustainable Energy Strategy. Whilst this guidance you point to in the SPG provides a useful context for the consideration of planning applications, it does not provide strict criteria which all proposals must meet in order to be considered acceptable in planning terms.</p>
			<p>Recommends the Strategy should include a statement confirming that the 'impact of wind turbine development on landscape is a primary consideration', and a definitive plan subject to planning controls for the siting of turbines in West Lancashire.</p>	<p>Individual proposals must be considered on their own merits, within the specific local context and must have regard to the wider Development Plan. This is made up of Local Plan policies, the emerging Local Plan policies and the National Planning Policy Framework (NPPF). It is the role of the planning system, through consideration of all of this guidance, to assess planning applications, including those for wind turbines, and to balance the impacts of each proposal with the benefits.</p>
5	Paula Huber, WLBC (Regeneration)	Business and Industry	<p>Recommends WLBC should be doing more to encourage our contractors to reduce their carbon footprints, to demonstrate the Councils commitment to tackling this agenda from all sides.</p>	<p>Agreed. Included within the Commercial action plan for further investigation.</p>



6	Dalton Parish Council (c/o Elizabeth-Anne Broad)	Residential	<p>Welcomes making homes more energy efficient, however the same offer should be available to all. Presently, the Green Deal is skewed to tenants/fuel poor whilst missing the masses.</p>	<p>The Green Deal is available to all homeowners and businesses. Depending on each residents situation, ECO funding may be available to subsidise the required measures and ultimately reduce the Green Deal loan value, however this specifically targets those on benefits, struggling in fuel poverty or living in hard to treat properties. Green Deal has been developed to aid 'the masses'. The main concern is those in fuel poverty that move into a property with a green deal loan already attached to it.</p>
			<p>Concerned that waste energy comes top if this means 'energy from waste' as such plants are resource hungry and could hinder recycling. Emission from such plants are also potentially harmful. Utilising methane from existing landfill is recommended.</p>	<p>Wasted energy' was referred to in this context as heat lost through inadequate thermal insulation properties in buildings.</p>
		Renewable Energy	<p>The Chapter on wind is weak in protecting residents from the impact of wind turbines. No mention of distance from property or height to distance quotas. Concerned about low frequency noise. Encourage tightened policy with definitions of appropriateness.</p>	<p>Addressed above.</p>
			<p>Concerned by the absence of policy on solar parks. Encourage policy to make it difficult for a developer to utilise agricultural land for this purpose.</p>	<p>Proposals for solar parks, which would result in the loss of agricultural land, would need to be considered on their own merits, in line with national and local policies.</p>
7	Chris Carpenter, WLBC (Environmental Health)	Transport	<p>Air quality monitoring continues within the Borough with no new areas of concern being identified. Latest assessment results and progress update are now available on the Council website, highlighting recent work with partners in relation to improving the air quality management area and the Borough as a whole.</p>	<p>Comments noted.</p>

8	Wrightington Parish Council (c/o Mrs Carolyn Cross)	Renewable Energy	The overall policy is agreeable. Support renewable energy proposals but would like to see more emphasis on promoting solar technologies, particularly in rural areas, with wind turbines reduced to a minimum.	Addressed above.
		Transport	Improvements are needed to public transport, cycleways and pedestrian routes to encourage a reduction in car use. A review of public transport charges is also recommended to encourage greater use and make these services more sustainable in the long term.	This Strategy aims to do all it can to promote public transport and make its use as easy as possible, however the services provided and the costs charged to users are beyond the Council's control.
9	Community Keep Warm Ltd (c/o Mark Kelly)	Residential	Suggested reference to properties with defective cavity wall insulation. Many properties insulated 10+ years ago with wool or foam insulation now suffer from wet, sunken or disintegrated insulation leaving cold spots. These properties can be identified with thermal imaging technology and require extraction of old insulation and new installed. Hard to treat properties with narrow cavities also omitted, which can now be treated with bonded bead insulation.	Agreed and included.
10	Natural England	Renewable Energy	Enquiry as to whether the findings of the Renewable Energy Studies identify potential effects of wind turbines on qualifying species? If so, this should be referred to within the document.	The planning policy document 'Habitat Regulation Assessment' does refer to this issue. This can be viewed on the council website.
11	Downholland Parish Council (c/o Jill Cavan)	Renewable Energy	The movement towards sustainable energy should not take place without due consideration of the effects on the quality of residents lives. Individual schemes should be subject to full public consultation.	Addressed above.

		Transport	Supports the objective of encouraging sustainable transport, such as public transport but there should be regular and dependable public transport connections between larger centres such as Ormskirk and the outlying villages so people are able and keen to use it.	Comments noted.
12	Aughton Parish Council (c/o Irene Roberts)	Renewable Energy	Separation Distance Policy should be should be formulated and adopted to safeguard/protect residential amenity particularly for those properties within close proximity of a Wind Turbines. This should be added into Local Plan along with requirement to consider other issues such as landscape character and noise etc.	Addressed above.
13	Burscough Community Energy Company and Burscough Sustainability Working Group of Burscough Parish Council (c/o Cynthia Derelli)	Residential	Two issues are being confused, fuel poverty as a result of household poverty and fuel efficiency, as a factor of the type of fuel plus the insulation factors in the house itself.	The Strategy clearly outlines that fuel poverty is determined by the interaction of a number of factors but 3 key components are the cost of the fuel being consumed, the energy efficiency of the home and the household income.
		Renewable Energy	<p>Would like to see a more positive angle on wind energy. Issues such as flicker, birds and radar interference have been exposed as myths by experts are all given credence. On the other hand, the work being done to map areas suitable for wind is not engaged with.</p> <p>The Council is failing to have a policy in place that will positively promote the use of this resource, in spite of recognising in the Strategy that the Borough is well suited to it.</p>	<p>The Strategy fully supports the development of wind energy developments, while ensuring that any adverse impacts are addressed. Considerations to potential issues such as shadow flicker and ecology are part of the planning approval process, which this Strategy aims to inform about.</p> <p>Both the current and emerging Local Plans contain planning policies on wind turbines. The new Local Plan 2012-2027 has been produced in line with the National Planning Policy Framework (NPPF) guidance which requires Local Planning Authorities to have a positive strategy to promote energy production from renewable sources, while ensuring that adverse impacts are addressed satisfactorily. Whilst this Strategy document encourages the use of all renewable technologies and makes reference to national and local planning policies, it should be noted that it is not itself a planning policy document</p>

		Green Communities	Burscough Renewable Energy Company has completed two schemes installing solar panels at the Cricket Club and the Stanley Institute. Financed initially by grants from the Parish Council, the aim is to use the feed-in tariff to develop other projects on renewable energy for the benefit of the community, as well as providing an advert for the potential of renewables.	Noted and supported. Case study detailing the work of the Burscough Renewable Energy CIC to be included in the 'Green Communities' chapter.
		Sustainable Development	Questions who is responsible for implementing increasingly stringent standards. Would like to see the Local Plan take a more positive approach to encouraging the use of brownfield sites.	Unfortunately Central Government have steered away from bringing in national sustainability standards for new developments. Local Authorities have the power to do this through the planning process, which has been incorporated into West Lancashire's emerging Local Plan 2012-2027.
		Business and Industry	Would like to see the Council brief local businesses on the potential of renewables and grants available etc.	A series of informative Resource Efficiency seminars have been delivered to West Lancashire businesses over the last few years. The programme was delivered by Groundwork, in partnership with Enworks, providing business support and ongoing advice services to many local businesses across the Borough. Hopefully, further funding will be sought to continue this support in the future. This Strategy also aims to be an effective and up to date advice service on renewables and grants/ funds available.
		Transport	Enquiry as to why only Ormskirk is designated an AQMA and whether monitoring has been undertaken in Burscough.	Air quality pollutants are monitored across the Borough, particularly in areas with busy traffic. Only the small area around Moor Street was been identified to breach national levels, predominantly due to heavy queuing traffic in narrow built-up streets.