

Appendix 3

Climate Change Scoping Development Plan Document Scoping Feedback Business

Strategic Planning

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Business Submissions

1.1 URN 013 DJ Newman Joinery

This is self-serving, but I am writing this with a real desire to raise awareness on a vitally important environmental issue. As a joinery company, we monitor planning applications made to the Council. It is very depressing to see so many applications being made to replace timber windows with plastic or aluminium ones. The reasons given are usually that they are cheaper to manufacture, require less maintenance and last longer. These reasons are now longer truly valid, as I will explain. But of far more concern is the environmental cost of using these materials.

Simply put, timber is a natural and replenishable resource that is endlessly renewable. By contrast, PVC is made from oil; and aluminium is made from bauxite. Both are non-renewable resources. The production of aluminium and PVC requires a huge amount of energy and creates a significant amount of pollution. The production of timber requires only a fraction of this energy. And there is no pollution caused by manufacturing timber as the amount of pollution created is negated by amount of carbon

captured in the trees by photosynthesis – which ultimately is locked into the window frames

themselves. Throughout the life-expectancy of a PVC window, two cycles of pine trees can be grown and harvested, each cycle trapping significant amounts of CO₂.

The maintenance argument is also incorrect. Of course, windows made of softwood do have a much shorter life expectancy than plastic or aluminium – and require regular maintenance. However, today the use of engineered softwood has totally changed this. Accoya[®], a timber engineered by acylating Radiata Pine, a softwood, has a guaranteed life-expectancy of over 50 years and requires no maintenance. Because it is such a stable material, factory-applied paint coatings can easily last 10 years. Hardwood windows also outlive the guaranteed life expectancy of PVC. Whilst not as long lasting as Accoya[®], we offer a 20-year guarantee against rot for hardwood windows. The plastic industry generally only offers a 10-year warranty.

And, at the end of its life cycle, plastic and aluminium windows invariably end up in land fill. By contrast, timber windows being biodegradable can be recycled through composting or burning in a biomass energy plant to produce renewable energy.

There are numerous studies that support the advantages of using timber for the environment. Cradle-to- grave greenhouse gas emissions of a window frame made from aluminium amount to 113 kg of CO₂ equivalent. A plastic window produces 116 kg. A hardwood or Accoya[®] timber window produces NO greenhouse gases. Indeed, it reduces such gases by between 8 kg and 25 kg. Cornwall Council has declared that it will take responsible steps to safeguard the environment. Please, please bear in mind the case for stipulating the use of wooden windows and doors when reviewing planning applications.

1.2 URN 014 Verto Homes

As I understand Climate Change is high on the agenda for Cornwall – it would be great if there was a way my clients could help advise and get involved with any consultation going forward.

I represent, Verto Homes which currently have developments in Cornwall, and are expanding their Zero Carbon Smart Homes offering around the South West – to continue to spread the value of Zero Carbon Smart Homes across the UK. At present, the built environment accounts for 40% of all the UK's carbon emissions, according to UKGBC. And while the carbon footprint of buildings has reduced since 1990, there's still a long way to go to decarbonise the existing housing stock as well as neutralise houses new build homes which are already in the planning stages and are not being built sustainably.

1.3 URN057 ISCF Transforming Construction

I wanted to draw attention to an approach that has been taken by a completely different sector which may be a useful parallel case study as to how to develop a holistic method to the future deployment of RE in Cornwall and how it can be supported through the DPD.

Homes England are supporting local authorities and other developers to unlock potential sites for new housing. They have set out in their strategic plan (<https://www.gov.uk/government/publications/homes-england-strategic-plan-201819-to-202223/homes-england-strategic-plan-2018-to-2023>) some very clear objectives, KPIs and short/medium/longer term priorities.

i.e. objective 1 – unlocking RE developing sites; priorities:

- identifying suitable development sites with access to good RE resource, grid connection (WPD future needs) and real community benefit
- supporting communities to include sites within NDP

KPIs – successful RE planning apps, increase in RE deployed, increase in community owned RE etc. I also wanted to provide a link to some work done by Lancaster Uni on developing a tool to support the identification, application and management of enhancements to ecosystem services on RE sites (<https://www.lancaster.ac.uk/spies/>). This has superseded the BRE biodiversity guide. Also, national trade associations have also published charters for developers to improve the outcomes of RE developments, such as STAs Land Management Charter (<https://www.solar-trade.org.uk/wp-content/uploads/2019/06/The-Natural-Capital-Value-of-Solar.pdf>)

1.4 URN 064 IGAS

IGas Energy PLC (IGas) supports the transition to a zero-carbon economy through the sustainable use of indigenous energy resources and the reduction in reliance on less sustainable world sourced energy resources. The transition to a zero carbon economy will provide the opportunity to develop more sustainable forms of development and energy sources beneficial to the environment.

Promote natural ways to achieve climate change by progressively reducing greenhouse gas emissions, such as carbon dioxide, but recognise the continued importance of hydrocarbons to achieve the projected growth set out in the Local Plan for Cornwall and the contribution hydrocarbons will make in the transition to a zero carbon economy within and beyond the Local Plan period. Through the planning process, develop policies that reduce reliance on hydrocarbons by actively promoting and supporting renewable energy schemes; require new development to be designed to use less energy; protect and enhance the natural environment; develop more sustainable transport opportunities.

IGas supports the intention to investigate the identified topic areas and develop policies to support them, particularly in respect of energy efficiency and renewable energy.

IGas supports Cornwall's ambition to achieve carbon neutrality by 2030 and the development of effective policies to deliver it. However, the UK Committee on Climate Change (CCC) in its May 2019 Net Zero report clearly forecast a very significant UK gas demand out to 2050 and beyond – approximately 70 per cent of 2019 gas demand still existing in the year 2050. Under the CCC's recommended pathway to net zero CO₂ this gas would be used as both a feedstock for making hydrogen and a backup supply for generating electricity. Carbon Capture and Storage would accompany gas usage to ensure net zero CO₂ emissions. If onshore gas and oil is not produced, there will be a considerable increase in import dependency on imported liquefied natural gas - potentially as high as 86% - even under net zero conditions. Whilst it is acknowledged there are no oil or gas reserves in Cornwall, IGas supports the development of policies that would actively promote and support energy efficiency and renewable energy that would lead to less reliance on imported oil and gas and assist the UK in transitioning to a low carbon economy. IGas particularly recognises the

contribution deep geothermal energy could make in the transition to a carbon neutral economy and would support specific policies to realise this opportunity. IGas would therefore encourage the development of policies that provide support for deep geothermal exploration, appraisal and production and that policies do not incorporate unnecessarily onerous restrictions which could discourage or cause delay to the preparation of development proposals or the assessment and decision making process. Such activities could be carried out without unacceptable impact on communities or the environment and in close proximity to existing or future development which it could serve and could make a significant contribution in the transition to a zero or low carbon economy. New planning policy should be prepared in a positive way to support sustainable development proposals in accordance with Government policy and national guidance set out in the National Planning Policy Framework. In this respect they should be written in a way that provides opportunities rather than creating impacts. With regards to deep geothermal energy, given the geology of Cornwall, there is considerable opportunity for exploration, appraisal and potentially production. IGas welcomes the recent support that has been provided through the planning process and by Cornwall Council to undertake exploration, appraisal and potential production of deep geothermal exploration. It is evident that such activities can be carried out in appropriate locations and in close proximity to developments that could benefit from their activities through the delivery of a renewable energy resource. IGas would welcome planning policies that would encourage and facilitate further exploration activities to enable deep geothermal energy to make a positive contribution in the transition to a zero-carbon economy in as short a timescale as possible.

1.5 URN 070 Plug Into the Sun

1, impact upon nature and our ability as a species to adapt and survive the changes

2, government and business not changes their focus quickly enough away from consumerism towards genuine sustainable development

1, Sustainability on every level converting energy, waste, water, transport, housing etc.

2, engaging the public through interactive consultation, community engagement and education through communities and schools

Wholistic lifestyles and community development, support for small scale rural sustainable businesses. Refocusing tourism into supporting ng communities and local environments and sustainable business 100 per cent renewable by 2025 New green deal to train and inspire next generation of business to install the solutions. Whole house retrofits for carbon neutrality. All new homes to be carbon zero. Encourage and support local organic food production It should have very positive impact I have been an education for sustainable development consultant since 1999. I wrote the councils first sustainable development policies in 1998. I installed over 1000 solar installs throughout Cornwall, including trelliske and new County Hall. I have provided interactive sustainability workshops in over 100 schools and community groups throughout Cornwall for over 10.000 people. I am extremely keen to be supportive and assist in the transition and have many skills and experience of these topics. Please reach out and engage with me so I can be supportive. Kind regards and well done for starting this dialogue. I am glad the council are taking this seriously

1.6 URN 086 Permaculture Kernow

I feel that even 2030 is not early enough. The rise in temperature by then will be causing many problems including food shortages.

The possibility of floods worsening and coastal damage Encourage and subsidise Public transport.

Encourage farmers to use sustainable methods to produce our food and be subsidised to plant trees at the edges of their fields.

The use of plastic when other materials such as hemp could be used to replace many articles.

"Planting trees and encouraging sustainable farming

Educating the public on the dangers of excessive consumerism" I expect more interest in permaculture methods of growing food

1.7 URN 087 The Goodh Farm

Social uprising as we head closer to a climate collapse.

Ecosystem failure with an extreme shift in climate.

Transition to 100% organic farming and at the very least more emphasis on soil-health in agriculture; reducing inputs. More spaces managed for rewilding to draw down carbon and keep the ecosystem services robust and so offer a safety net. The area we live in is a desert and there is little wildlife. Creation of well-considered and extensive wildlife corridors that span the county. More profitability for us as we are farming with nature, so a healthier ecosystem is more money in our pocket. Having a regional educational impact regarding climate crisis would also help us to engage with our local community on what we do at the farm.

1.8 URN 174 Imerys Minerals Limited

1, The potential impact that it may have on the economic, environmental and social factors associated with sustainable development.

2, The lack of a global 'joined-up' thinking approach to tackling the potential issues that may arise by global leaders.

1, Work with Western Power Distribution on developing a local energy plan.

2, Provide broad allocations of land suitable for the installation of major renewables and associated infrastructure. Set out policy for the siting of other major renewables including storage facilities. Set out policy relating to the safeguarding of existing renewable resources.

The list of general topics is suitable for informing the specific planning policies required.

The following policy areas should be pursued as part of the Climate Change DPD:

-Prioritise working with Western Power Distribution on developing a local area energy plan;

-Allocate areas for renewable development;

-Set renewable energy targets;

-Provide clear guidance on demonstrating community support;

-Outline specific policy and guidance on energy storage projects;

-Set restrictive policy on generation that is not low carbon;

-Provide detailed, industry specific guidance for biodiversity net gain on renewables projects and associated industries.

If the new planning policies are worded correctly they could provide opportunities for the business, however if they are too prescriptive they may present risks to the business. Therefore, a balance has to be reached in terms of the planning policies not being too prescriptive, yet provide the appropriate level of guidance to be effective.

Under the topic Natural Climate Solutions, the following comments should be considered when formalising a Biodiversity Net Gain policy;

We recommend that specific guidance is prepared for application of the Biodiversity Net Gain (BNG) Metric for minerals extraction development and for Mineral Planning Authorities, acknowledging

that minerals development is different. The BNG Metric was developed, primarily, for housing, commercial and infrastructure development that result in a permanent 'concrete' footprint and often net loss of habitat and biodiversity. Minerals extraction is a temporary development and site management, restoration and after-use has often resulted in large-scale biodiversity benefit and net gain, generally on-site. A long view is also needed, acknowledging the phased approach to working and restoration, with long-term overall large-scale gains accounted against losses in early phases of the development.

The BNG Metric needs to be applied pragmatically and flexibly for minerals extraction. The industry has a long and proven track record of delivering biodiversity including net gain, on and near to extraction sites. Operators/applicants should therefore be regarded as 'trusted providers' with experience, expertise and reputation for delivery of biodiversity and engagement with stakeholders, reflecting the nature of the industry and the circumstances and opportunities presented by minerals sites. The BNG Metric must not result in a loss of sight of the most desirable outcomes. The BNG Metric is by its nature formulaic (and we appreciate the need for consistent and standard approaches) but some of the scores and risk multipliers, including time-to-target condition, appear to overly penalise and dis-incentivise creation of priority habitats. Minerals sites often have the conditions and circumstances (soils, hydrology, seed banks, geographical context etc.) that enable delivery of priority habitats more quickly and easily than the averages represented in the scores. The BNG Metric must not be used inflexibly by planning authorities to maximise points, or by developers to 'game' the system based on simple points, encouraging 'easier' to create habitats e.g. scrub, where other habitats are clearly more appropriate and beneficial in terms of biodiversity and wider ecosystem services and natural capital.

1.9 URN 179 Cornwall Eco projects Resource Centre

1 Loss of biodiversity

2, The Climatic adverse impact on food production, disruption and interruption to food supplies across the world will only get worse.

Adaptive local food production must be made an urgent priority to contribute to a greater food security for Cornwall and to serve as a model of good practices for other regions.

1, make regenerative agriculture compulsory

2 Fine farmers using pesticides. Make organic farming the norm.

The planning department must adapt its policies and be giving planning priority to sustainable low impact housing. Adopt the Welsh One Planet model or similar for planning purposes.

Sustainable local materials and Permaculture principles. Why can't these be made policies?

I do not think that the new planning policy reflects the urgency of the climate situation.

1.10 URN 182 The Carbon Buddy Project

1, The crisis of individual inaction: there are huge barriers, financial, practical and behavioural which hold back individual behaviour change. Planning policies are "top down" and remote from these issues. What Cornwall Council should also be doing is facilitating "bottom up" action by individuals to make lifestyle changes in order to reduce their own "personal pollution". My new book, The Carbon Buddy Manual, created in Cornwall, is a practical tool to help individuals overcome these barriers

2, New planning policies will do little if they, as in other areas, are given little weight, lack significant sanctions for noncompliance, and if there are no enforcement mechanisms

1, Why is the response to the climate emergency only being defined in terms of planning policy?

There needs to be a much wider analysis of the problem and a much bolder approach about how to

produce RAPID AND SUBSTANTIAL cuts in greenhouse gases generated in Cornwall. A few new planning policies will be too slow and will be marginal in their effects

2. Retrofit of insulation in old housing stock coupled with new installations of efficient heating. People can't afford it and it is probably one of the biggest impacts we could have.

Focus on what would help individual households to reduce their personal pollution (carbon footprint). The Carbon Buddy Manual will give you a good starting point for analysing these. It can be purchased at <https://www.carbonbuddyproject.org/buy-now>

1.11 URN 186 LDA Design

1, Cornwall should target being the leading location in England for installed renewable energy capacity. A positive planning framework, both in Local Plans and Neighbourhood Plans, is essential for achieving this and for supporting the significant uplift in installed capacity that is required to achieve carbon neutrality. In order to achieve the ambitious target of carbon neutrality by 2030, Cornwall Council's planning policy relating to renewable energy will need to be framed as positively as possible to minimise barriers to bringing forward renewable energy

schemes in the right places. Policy wording should avoid being overly prescriptive to the extent that this restricts development coming forward in suitable locations. The idea of what might constitute a 'suitable location' should also be more flexible. The overriding objective should not necessarily be to hide renewable energy generation, but instead to embrace it as a core part of planning for population growth. Policy should also be sufficiently flexible to ensure that the DPD remains a relevant and appropriate policy framework throughout the course of its lifetime.

Zoning policies for solar PV development, which specify locations where solar PV would be acceptable, should be avoided. Landscape and visual impacts of solar PV development can often be minimised through careful site selection and a considered approach to site layout, in a way that is not always achievable for development of wind turbines. Zoning policies can therefore be unnecessarily restrictive for development of suitable sites that may lie outside of identified areas.

The Climate Change DPD should ensure that policy for the siting of solar PV development is not unduly restrictive in relation to agricultural land classification. Current guidance in the Cornwall Renewable Energy Planning Advice SPD (March 2016), in relation to Use of Land (Section 5.6) currently suggests that applications for development of ground mounted solar PV on agricultural land of grades 1 – 3b should be justified by 'the most compelling evidence'. Such an approach sets a high bar to be met by applications on such sites, which could constrain development from coming forward, particularly in the case of major/large scale solar PV development.

The Climate Change DPD should not have such a restrictive approach. It is certainly not considered appropriate to set such a high bar for justifying development of solar PV on grade 3b land, which is not included in the definition of 'best and most versatile' agricultural land set out in the National Planning Policy Framework (NPPF). As the Renewable Energy SPD was published prior to the Council committing to achieve carbon neutrality by 2030, there are aspects of the SPD such as this, which could frustrate the ability to achieve this objective and it is suggested that the Climate Change DPD should update and supersede the SPD accordingly. Planning policies should recognise the fact that renewable energy developments often need to be sited in a particular location to achieve a suitable and affordable grid connection. Planning policy should give weight to this in the overall planning balance in the consideration of the acceptability of a site for development.

Through our work for renewable energy developers we have gained a good insight into the considerable upfront resource and funding that is required to negotiate land deals, grid connection and prepare planning applications for large-scale renewable energy projects. A positive planning policy framework for renewable projects is essential for helping to minimise the risk associated with this and encourage investment in the county.

1.12 URN 189 Bourne leisure

Bourne Leisure is the UK's largest domestic holiday operator and, at peak, employs a team of over 17,000 people. The business generates over £1 billion of turnover. As such Bourne Leisure is a significant contributor to Great Britain's tourism economy, operating a total of more than 50 holiday sites. These sites comprise hotels; family entertainment resorts; holiday villages; and holiday parks. They are operated through three brands: Butlins, Warner Leisure Hotels and Haven. In Cornwall, Bourne Leisure's key assets are Haven's Perran Sands Holiday Park, Perranporth, and Riviere Sands Holiday Park, Hayle. In order for Bourne Leisure to keep attracting new and repeat visitors, Bourne Leisure is constantly reviewing and upgrading its sites. Investment to improve existing facilities and accommodation on Haven sites in 2019 alone amounted to circa £85 million. This in turn creates jobs and provides wider spending in the local economies.

An important part of the investment decision is how to reduce the Company's carbon emissions. Between 2012 and 2018 Bourne Leisure reduced its Carbon Reduction Commitment emissions by 45% and now also ensures that low carbon infrastructure and systems are carefully considered for new and upgraded facilities. The emerging DPD Once adopted the emerging DPD will be an important part of the decision-making process for planning applications in Cornwall. It is important that the DPD sets out effective policies that include targets that can be met realistically throughout the plan period. There is no disagreement with the underpinning reason for preparing the DPD. It is, however, vital that the document does not add unnecessary duplication to the adopted Local Plan. In addition, the Council must ensure that it does not set out requirements that cannot be met through reasonable technological and financial means for each sector, in our client's case, tourism. Requirements of the emerging plan must be sufficiently flexible to facilitate development (for wider economic reasons) while seeking improvements in the climate change measures where these are possible. Such measures will vary markedly between sectors. Even within a sector, there will be significant differences in what can be achieved at a particular time. Whilst it is right that new standards drive forward reductions in carbon emissions, it is necessary for these standards to be in line with national targets. This is to ensure that the sectors benefit from advances being made at that time without unacceptable or unintended consequences upon that industry and for the local economy. We have not seen any evidence that suggests that Cornwall must move forward well in advance of the rest of England, as proposed in the Scoping Report. By forcing significantly challenging standards upon the tourism industry in Cornwall, decisions will be made on whether to invest in new and improved facilities and/or whether to make those investments elsewhere, where the targets are more achievable.

Further, for companies that operate across England and Great Britain, as Bourne Leisure does, there is a need for consistent standards and development requirements otherwise costs will spiral from ad hoc approaches. Such a position could have a chilling effect on investment decisions for particular locations. For these reasons we ask that the Council carefully considers such implications on the setting of energy efficiency targets as part of the preparation of the DPD. Lichfield's will be closely monitoring, reviewing and responding to further stages of plan-making as the ideas from the Scoping Report are explored further and finessed.

We would be grateful if you would confirm receipt of these representations and to also keep us informed of further rounds of consultation on this DPD and other planning policy and guidance documents emerging in Cornwall.

1.13 URN 199 - Home Builders Federation

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC's, regional developers and small local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following responses to specific questions in the Cornwall Climate Change DPD Scoping Report consultation.

Energy efficiency

Question 8) Are the policy approaches that we're suggesting about right – is there anything missing?

The Council is suggesting a policy approach based on the following two scenarios: - Scenario 1 - If new Building Regulations are introduced but the Deregulation Act of 2015 is not fully enacted so that the Council may still set its own Energy Efficiency Standards to exceed Building Regulations. The Council proposes to require a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L or to achieve any higher standard above this improvement required under new national planning policy or Building Regulations together with policy approach suggestions set out under Scenario 2.

Scenario 2 - If new Building Regulations are introduced but the Deregulation Act of 2015 is fully enacted so that the Council may not set its own Energy Efficiency Standards to exceed Building Regulations. The Council proposes the following policy approach: - 2

- to require development to follow the energy hierarchy (prioritising energy reduction & energy efficiency first, then renewable energy and finally offsetting residual carbon (allowable solutions)) in accordance with Building Regulations;
- to require provision of on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme, that contributes to a further 20% reduction in the residual carbon emissions subsequent to Building Regulations;
- to require financial contributions to a carbon offset fund to enable residual carbon emissions subsequent to Building Regulations and on-site renewable generation, where this has not already resulted in carbon neutrality;
- to require all new dwellings to achieve an estimated water consumption of no more than 110 litres per person per day and incorporate water reuse, recycling and rainwater harvesting wherever feasible and viable to reduce demand on mains water supply;
- to link design policy to the new Cornwall Design Guide ensuring that design and layout of development results in more sustainable places to live by considering issues such as of solar gain, reduced need to travel, etc. The development of a sustainable construction checklist for planning applications to demonstrate compliance with the new Cornwall Design Guide.

Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations but consider that the Council should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.

Recently, the Government held a consultation on The Future Homes Standard (ended on 7th February 2020). The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The Government's consultation addressed: -

- options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations. An increase in energy efficiency requirements for new homes in 2020 will be a

meaningful and achievable stepping-stone to The Future Homes Standard in 2025. This is expected to be achieved through very high

- fabric standards and a low carbon heating system based on one of two Options. Both Options increase costs for housebuilders (estimated costs between circa £2,557 - £4,847 per dwelling). The Government's preferred Option 2 proposes 31% reduction in carbon emissions compared to current standards (Approved Document L 2013) delivered by installation of carbon saving technology and better fabric standards;
- transitional arrangements to encourage quicker implementation; and
- clarifying the role of Councils in setting energy efficiency standards. The Government is proposing to remove the ability of Councils to set higher energy efficiency standards than those in Building Regulations, which has led to disparate standards across the country and inefficiencies in supply chains. The Government wants to create certainty and consistency. The situation is confusing with decisions about technical appropriateness, application and enforcement of energy standards considered by planning officers, committees and Planning Inspectors rather than by qualified Building Inspectors. An uplift to Part L standards in 2020 will improve the energy efficiency of new homes and prepare housebuilders and supply chains in readiness for the further uplift in 2025 to meet The Future Homes Standard so there is no need for Councils to seek higher standards.

The HBF's response to the Government's consultation recognises and supports the need to move to The Future Homes Standard but the Government's preferred Option 2 for a 31% reduction in carbon emissions compared to the current Part L 2013 requirements in 2020 would be difficult and risky to deliver given the immaturity of the supply chain for the production / installation of heat pumps, and the additional load that would be placed on local electricity networks when coupled with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes (also see HBF answer to Question 19 below). The HBF and its Members favour the Government's Option 1 for a 20% reduction in emissions in 2020 (involving higher fabric efficiency standards than Option 2) and then a further step to Option 2 standards by 2023, which would allow more time for the supply chain to gear up for the scale of demand entailed. The HBF submission argues that *"a stepped and incremental approach should be adopted given, in particular, the large requirement for supply chain and infrastructure investment and skills training to support this ambition. The consensus is that Option 1 should be implemented within 2020, with Option 2 being implemented within two to three years in approximately 2023. Our membership sees that transitional arrangements around this implementation should be 18 – 24 months"*.

It is also noted that the Council's proposed policy approach (under Scenario 2 2nd Bullet Point) requires provision of on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme. The Council's proposed requirement for connection to a renewable or low carbon community energy scheme should not undermine the technical and financial viability of development. The Council is referred to the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework (ending on 1st June 2020).

The Government is committed to achieving net-zero greenhouse gas emissions by 2050. Presently, heat is responsible for a third of the UK's greenhouse gas emissions. To meet the Government's legal commitment virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that

“a statutory framework should be set up that underpins the regulation of all heat networks.” They recommended that *“the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector.”* The Government’s latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.

With regard to Scenario 2 4th Bullet Point, under current Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the NPPG (ID 56-013-20150327 to 56-017-20150327). The NPPG references *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”* however the Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. In conclusion it is the HBF’s opinion that the Council’s policy approach under Scenarios 1 and / or 2 should not be setting different targets or policies for energy and water efficiency outside of Building Regulations.

It is also noted that the Council’s proposed policy approach (Scenario 2 5th Bullet Point) refers to the new Cornwall Design Guide. The Regulations are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in a DPD rather than a Supplementary Planning Document (SPD). Where SPDs are prepared, they should be used to provide more detailed advice and guidance on the policies in the DPD and not as an opportunity to change or introduce the requirements of a policy. Fundamental policy matters should not have been devolved to the new Cornwall Design Guide. As defined in 2019 NPPF Glossary, an SPD is capable of being a material consideration in planning decisions but is not part of the DPD. The Regulations indicate that an SPD does not have statutory force. An SPD is defined as something that is not a DPD as it has not been subject to the same process of preparation, consultation and examination. The Council should not be conveying DPD status onto the new Cornwall Design Guide.

Question 9) We are undertaking a refresh of our Strategic Viability Assessment to support these policies, but do you have any other comments on the likely impacts on viability of the policy suggestions?

In plan-making, viability is very closely linked to the concept of deliverability. The contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in a DPD. As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the DPD is threatened (para 34).

To ensure viability, the cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions should provide sufficient incentive for a reasonable landowner to bring forward their land for development. Viability assessment should not be conducted on the margins of viability. If the resultant Benchmark Land Value is lower than the market value at which land will trade, then the delivery of housing targets will not be met. Viability assessment is an iterative process, in low / middle value areas “trade-offs” between affordable housing provision, CIL, S106 contributions and policy requirement compliance may be necessary.

For the Council’s information, the HBF Local Plan Viability Guide is attached. Viability is a key issue in determining the soundness of DPDs at Examination.

This guidance puts forward issues that must be addressed in order to ensure that DPDs are deliverable and sites come forward for development. Without a robust approach to viability assessment land will be withheld from the market and housing delivery will be threatened, leading to unsound plans and housing delivery targets not being met. The Council is referred to the Common Concerns Boxes.

The Council’s refresh of its Strategic Viability Assessment should also take account of: -

- Future Homes Standard costs (see HBF answer to Question 8 above);
- The cost of connection to a renewable or low carbon community energy scheme (see HBF answer to Question 8 above);
- Optional water efficiency standard (see HBF answer to Question 8 above);
- Additional costs for biodiversity gain and deduction from developable acreage (see HBF answer to Question 16 below). The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies: Impact Assessment Table 14: Net Gain Delivery Costs (Residential) sets out regional costs in South West of £18,470 per hectare of development based on a central estimate but there are significant increases in costs to £63,610 per hectare for

off-site delivery under Scenario C. With regard to deductions from developable acreage, Table 14 also estimates 4.6-unit loss per hectare of development; and

- Additional cost for installation of EVCPs, the Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per space, plus any costs for upgrading local electricity networks (see HBF answer to Question 19 below).

Natural climate solutions

Question 16) Is the policy approach that we're suggesting about right – is there anything missing?

The Council proposes to formalise a Biodiversity Net Gain policy using the following policy approach options: -

- 10% gain across all development in accordance with the Government's Environment Bill or 10% gain over major development and a green points style system for minor development. This would require major development proposals to contribute to the greening of urban areas of Cornwall as a fundamental element of site and building design incorporating measures such as high-quality landscaping, green roofs, green walls and nature-based sustainable drainage;
- The planting of hedges and trees for all development. This could be in addition to any net gain required;
- Safeguarding types of habitat that are site specific potentially linked to protection of wooded areas in upper catchments related to natural flood prevention;
- Eco-system / Environmental Gain policy in Critical Drainage Areas for upstream planting of trees or provision of wetlands or land management changes to provide for protection for flooding of new and existing development;
- The embedment of the requirements of multi-functional green infrastructure, Building with Nature and biodiverse design (such as naturalised SUDS).

It is the HBF's opinion that the Council should not deviate from the Government's proposals on biodiversity gain. In 2019 Spring Statement, the Government announced that it would mandate net gains for biodiversity in the forthcoming Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further or do so in designing proposals to meet other local planning policies. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.

Broad exemptions from delivering the proposed mandatory biodiversity net gain (except for permitted development and householder applications) will not be applied instead the Government will introduce narrow exemptions applicable to only the most constrained types of development. Sites not containing habitats to start with (e.g. those entirely comprising buildings and sealed surfaces) will not be required to deliver compensatory habitats through biodiversity net gain but may be required to incorporate some green infrastructure through wider planning policy. A targeted exemption for brownfield sites that meet a number of criteria including that they (i) do not contain priority habitats and (ii) face genuine difficulties in delivering viable development will address concerns about the cost sensitivity of the redevelopment of post-industrial developed land. Exemptions will be set out in secondary legislation.

The Government intends that small sites are kept within the scope of the mandatory net gain approach but will consider whether minor residential developments should be subject to longer transition arrangements or a lower net gain requirement than other types of development. A simplified process for minor (less than 10 dwellings) developments will be introduced to ensure that such schemes do not face additional new survey requirements. This simplified assessment will not include a condition assessment, so users will only need to state what habitats are present and the area that these habitats occupy to define their baseline for net gain. The Government will also consider exemptions for development of specific ownership types which may be disproportionately impacted through these changes, such as residential self-build.

The Government will issue guidance to Councils on the importance of proportionality in their application of planning policy. So that sites without reasonable opportunities to achieve net gain through on-site habitat delivery will not face risks of delay through rigid or prescriptive requirements.

The Environment Bill will introduce new duties to support better spatial planning for nature through the creation of Local Nature Recovery Strategies (LNRSs). LNRSs will detail existing areas of high biodiversity value as well as those areas where habitat creation or restoration would add most value. The intention is that the whole of England will be covered by LNRSs with no gaps or overlaps. Each LNRS will include a statement of

biodiversity priorities for the area covered by the strategy and a local habitat map that identifies opportunities for recovering or enhancing biodiversity. The Government will provide data, guidance and support but each LNRS will be produced locally, with a relevant public body appointed as the responsible authority by the Secretary of State. This will achieve the best combination of local ownership and knowledge and national consistency and strategy. Such spatial environmental mapping will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on.

Work will continue to develop better baseline maps of habitats at a national level, which will ensure improved environmental mapping is available locally. However, the Government will not recommend that these baseline maps are used in place of site-level assessments, which will still be needed for wider environmental requirements and for a robust biodiversity net gain assessment. Instead, it will enable these maps to be used in cases of disputed baselines, primarily where alleged habitat degradation before development causes disagreement between the Council, communities and developers about what the baseline habitat state should be. Guidance will clarify the assumptions that decision makers should consider in these circumstances.

The Government will require net gain outcomes to be maintained for a minimum of 30 years and will encourage longer term protection, where this is acceptable to the landowner. The Government will legislate for Conservation Covenants in the Environment Bill.

The Government will not introduce a new tariff on loss of biodiversity. The Environment Bill will make provision for local decision makers to agree biodiversity net gain plans with developers. Where offsite compensation is required, Councils will be able to review developers plans to deliver compensation through local habitat creation projects. Where suitable local projects are not available, there will be the option for investment in nationally strategic habitats through a Government offering of biodiversity units set at a standard cost. The Government will make provision for these 'statutory biodiversity units' in the Environment Bill. By not instating a rigid tariff mechanism, the Government will make it easier for Councils, landowners and organisations to set up habitat compensation schemes locally, where they wish to do so, and will still provide a last-resort supply of biodiversity units from Government where this is not the case. The Government's proposals for statutory biodiversity units will provide a recourse for developers and Councils, where local habitat compensation schemes are not available, therefore preventing delays to development.

Additional costs for biodiversity gain are significant, which must be tested in the Council's refresh of its Strategic Viability Assessment (see HBF answer to Question 9 above). The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery.

The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.

Transport

Question 19) Is the policy approach that we're suggesting about right – is there anything missing?

The Council has identified the following policy options to help achieve carbon neutrality and address the impacts of climate change: -

- To require Transport Assessments on developments of 50+ houses to include justification of proposals against hierarchy of travel modes;
- To require provision of electric vehicle charging infrastructure in new developments with a mixture of on-plot and communal parking and charging;
- To establish parking standards that represent a shift from car-reliant developments by limiting car parking spaces or allowing car free development in appropriate locations and reducing on-plot provision of parking in new development in favour of strategic and on-street parking whilst introducing standards for car clubs / bike hubs, cycle parking / shelters and other infrastructure to support car-free development.

The Council's policy approach on the setting of local car parking standards should accord with the 2019 NPPF (paras 105 & 106).

The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the Housing stock. Recently, the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019).

This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020. The inclusion of

EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

In conclusion, it is not necessary for the Council to specify provision of EVCPs because of the Government's proposed changes to Building Regulations.

Conclusions

It is hoped that these responses are helpful to the Council in informing the next stages of the Cornwall Climate Change DPD's preparation. For the DPD to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the DPD must be positively prepared, justified, effective and consistent with national policy. The HBF look forward to submitting further comments during future consultations. If any further information or assistance is needed please contact the undersigned.

1.14 URN 212 Atlantic Energy

Thank you for the opportunity to respond to the draft Scoping report for the Climate Change DPD. The aims and development of the DPD so far are to be commended.

This response aims to suggest proposals which answer the questions raised in each topic section and to address a few more general points in the DPD document as it appears at present.

1 General

Whilst it is appreciated that climate change is a new idea to some people, an essential part of the Climate Change DPD will be to ensure that climate issues are fully taken into account in all planning decisions. To assist this process, I suggest the following: -

- Change the DPD document title to Climate Emergency DPD
 - o This ensures that the existential and urgent nature of the present situation is always at the forefront when thinking about planning issues
- Make a clearer distinction between climate adaptation and climate emissions mitigation
 - o at present the document is focussed almost entirely on mitigation with little attention given to adaptation
 - o Adaptation actions, which are equally necessary, could have major planning and land use impacts, but have little presence in the Scoping document other than flooding
 - o Extreme weather events and potential significant food supply insecurities are two example impacts requiring adaptation responses within the planning framework

- Ensure that increasing biodiversity is integrated into climate considerations
 - o Climate change and biodiversity/ecological losses are two sides of the same coin and both need clear priorities if we are to succeed in a long-term future.
 - o Integration of the aims and approaches this DPD with the Biodiversity Guidelines in preparation
- Ensure that the Climate DPD and climate issues are given the highest weighting in the decision-making process, when balancing Material Considerations
 - o This would have a significant impact on improving climate action and not allow it to slip down when considering all Material Considerations.
 - o Provides guidance that climate is a major Material Consideration and that decisions going against the climate imperative would need to have **very** strong arguments in favour to suggest overriding this.
- Methods of moving planning and land use decisions towards integrating necessary climate action and away from higher emissions activity.
 - o It is recognised that this may be difficult to codify, but if Cornwall wishes to have a long term and vibrant future we have to move to mainly low emissions activities as well as reducing our overall fossil energy demand: the planning system will have to adapt to this end as much as other parts of our system.
 - o Reducing the priority given to the proposed space port and its associated industrial activity is one example which could set a clearer target towards a local zero carbon planning approach
 - o Given the shortage of time to reach zero carbon the sooner this issue is being considered the lower the cost of changing our present land use and planning systems will be.
 - o This task may be also integrated with other local strategies, which need to be integrated to reach the same end.
- The Scoping document is silent on one main method of assisting the major task of reaching zero carbon: that of reducing demand by reducing the number of extra homes built in the Plan period.
 - o Even though the new homes may be low carbon, their presence means a higher population and hence higher carbon emissions from the new homes, new appliances, more travel etc
 - o the council will need to reach a ceiling on new developments to have any chance of reaching zero carbon.

1 Scoping themes missing from proposed outline

- 2** • The Local Industrial Strategy in preparation and the ongoing New Frontiers future-planning, as well as other forward-thinking policies must be integrated with a Climate Emergency response to Planning.
- o whilst it is recognised that there is a need to provide some limits on the scope and content of this DPD, there appears to be some gaps in how the content limits could be usefully overcome. In particular the integration of actions and decisions on climate change issues with other Council and Local Economic Partnership policies
 - o the LIS and other forward planning documents need to integrate the climate thinking in this DPD into their policies
 - Local produce and local processing land use policies needed
 - o the present pandemic and increased local food demand has shown how vulnerable our present food supply is.
 - o for future resilience, especially with extreme weather likely to disrupt local and imported food supplies, this DPD needs to enable the rapid development of local food growing & processing

Fact issues

- Policy document outline is out of date –no mention of the amendment to the Climate Change Act 2008 by SI in July 2019 to 100% carbon neutral by 2050 –not 80% any more.

6 Renewable Energy

6.1 Energy

A Local Energy Plan for the required transition to zero carbon would be helpful to the planning and land use decision process, provided it was developed collaboratively with Western Power Development, communities, landowners, and other stakeholders.

An effective Plan would cover: -

- Installation targets to reach zero emissions: helpful for Appeals in particular
- Strategic approaches on each energy technology deemed relevant
 - o Renewable energy
 - o Energy demand reduction and efficiency
 - o Buildings
 - o Transport energy
 - o Energy storage technologies
 - o Grid development for zero carbon operation
- Integration with biodiversity targets

6.2 Landscape

There is a pressing need to address the whole issue of landscape in a time of crisis and in recognition that climate action requires changes to landscape management and assessment.

- DPD process must include wider consideration of the meaning of “cumulative” impact in relation to landscape, local energy and community resilience and climate action
- Landscape issues also need addressing in the context of increasing biodiversity in Cornwall, with a process to include local energy production, local food production, increasing green infrastructure and increasing biodiversity: all these require integrated approaches to balance these potentially conflicting needs.
- Suggest that the “conversation” about our landscape in the climate emergency is an ongoing and collaborative process which takes place in a more open manner than only with required consultees, but also with local stakeholders throughout Cornwall.

6.3 Renewable Energy topics

• Planning process

o It would be helpful to planning efficiency and speed of decision making if the Renewable Energy Planning Unit in the Council was set up again.

o the lack of enough expertise at present in this vital topic is a major obstacle to moving Cornwall to zero carbon

o Smaller projects could be allowed lower costs for planning assessments as their impacts would be proportionately less. Whilst this happens to some extent now, with appropriate local consultations on general guidelines, this would be a significant help to community groups, SMEs and households wishing to move to low carbon operation.

• **Wind energy**, under the NPPF, requires that areas for wind are allocated and identified on maps in Local Plans. The NDP needs to include local maps for wind energy allocation

o Shortage of this action in NDPs suggests the need for this in the Climate DPD and the new CLP, given the large increase in wind power needed to provide renewable electricity in the winter.

o Area allocations need sensitivity in their development and need to be carried out effectively so that they are not arbitrarily restrictive and allow different scales of wind energy with different purposes e.g. large scale, local community, industry or household/hamlet scales

o Some issues exist on what is a “site”- especially when repowering windfarms (could depend on where the “redline” was drawn in the original planning application i.e. over the whole area or over just the turbines and trackways) This needs clarification to help not hinder repowering applications

• **Grid development** to allow more renewable electricity and suitable storage locations

o needs more detail than just a positive approach, with defined policies to allow local smart grid and potential islanding systems to be developed

• Energy storage

o Whilst storage is mentioned it is important that the many different storage technologies are allowed for in the policy developments proposed. This could usefully include:

- o Pumped storage technologies including – seaside quarries,
- o china clay lagoons, quarry pits
- o Mineshaft storage, hot gravel pit storage
- o Batteries, energy storage towers

o the proposed policy approach needs to allow and encourage many different technologies each with different planning impacts

• **Community ownership or co-ownership** is to be encouraged – local groups, local councils, etc.

o policy development needs to include clarification on how this is to be achieved.

o Community involvement/ownership could potentially be a planning condition (as has been achieved in other council areas)

o DPD process could include assessment of Community Right to Build Orders for local renewables development or some other local scheme to help this process

• Solar arrays

o planning applications to include sustainable land use proposals under and around the panels

o sustainable land use conditions would enable a balance to be struck between the need for local food production, renewable

electricity generation and increased biodiversity. This would mean stronger requirements regarding the land grade and how the ecology of any solar array site can be supported.

• **Offshore renewables policy** to be integrated into the marine policies and link to grid infrastructure and energy storage policy options, as offshore wind could be developed within the Plan period

7 Energy efficiency for buildings

Suggest the title of this section is change to **Energy reduction**, as this is vital to reach zero carbon emissions. Increasing energy efficiency and introducing more renewable energy supply is not enough action on its own, without large reductions in demand for energy. Whilst some elements of energy demand reduction are not planning matters, the notes below indicate which are key elements for reducing demand to help with carbon reduction targets.

Not present in scoping report

- Any new development should first of all assess its potential impact on transport requirements – as part of moving to zero carbon – by reference to location and employment space, public transport links etc. This needs to be top of the energy hierarchy
- All new build and refurbishment should include mainly or only low carbon and local materials to reduce the embedded carbon during the build process
- New housing developments need to include the requirement for the new buildings to all include three phase electricity supply – to enable heat pumps, EV charging and larger solar PV installations as part of the change to carbon neutral
- How to integrate the building standards and design with the new Design Guide for Cornwall, whilst ensuring low carbon and increased biodiversity approaches predominate

Proposed options

Whilst it is recognised that Cornwall Council is working hard to implement high energy standards for new building, it is important that the Council does not shirk the responsibility to get to zero carbon homes asap, and not let central government slow this process.

- Suggest that stakeholders are more involved in the process of decision making on how quickly to get to Zero Carbon for all new buildings, with low carbon and local materials preferred for the build
- Conservation Areas and Listed Buildings issues must be addressed on how to improve the building fabric and energy systems to move these buildings more rapidly to low carbon, whilst preserving their intrinsic character
- All extensions need to be low/zero carbon in operation
- New Cornwall Design Guide to include more information and guidance on low carbon and local materials to reduce the carbon cost of new build and refurbishment, both embedded and in operation
- New developments to be offgas grid in all cases, to ensure meeting upcoming new central government regulations Greater weight to be given to climate issues in these planning decisions, as noted in section 1: balancing Material Considerations.
- Suggest low/zero carbon standards as a condition of planning

Fact correction

It is not more expensive to make zero carbon dwellings: they can cost no more than ordinary dwellings as the heating systems are so much smaller. The main cost issue is ensuring the buildings are correctly built- which is required anyway. • Planning conditions need to include higher “as it is being built” standards monitoring We propose higher standards for building inspection, with more frequent inspections during the build process to ensure that insulation and airtightness in particular are built to standards.

8 Coastal Change and Flooding Not present in scoping document

- No mention of other expected extreme weather and climate change effects such as extreme winds- causing damage to infrastructure, homes, transport, woodland etc, or major drought causing subsidence to buildings, significant loss of food crops and farm animals
- Provision for these other climate impacts requires planning considerations such as: -
 - o Higher building standards, more shelterbelts
 - o Rainwater storage, via tanks or groundwater recharging through swales, soil carbon building approaches to land management, etc
 - o Upstream tree planting/soil carbon increases as part of planning for downstream developments
 - o Nature based solutions such as beavers in upstream locations
- Scoping for coastal management does not appear to include the potential to ban new developments below an agreed altitude to protect against expected sea level rise.
 - o Suggest Cornwall wide consultations to increase awareness of this threat within the lifetimes of buildings being developed now and to agree what level of sea level rise it is wise to plan for now, with potential to increase the altitude over time, and in specific locations where storm surges may be higher.

10 Transport

Not present in Scoping document

There appears to be a lack of understanding that we are in a climate crisis and that a key element of cutting carbon emissions is reducing travel. This means that there is no room for new roads, or other high carbon

emissions travel. Transport needs to be considered first when assessing the energy hierarchy as so much of fossil fuel energy demand depends on locational factors.

Proposals

- All proposed developments are first rated against their transport links active and public - and are refused if they are below an agreed level of provision: thus, encouraging developers to plan for active travel and to help increase public transport provision.
- New housing developments ensure that car parking is some distance from homes and that bike sheds are readily available- to reduce car use and increase active travel
- Any proposals for new roads to be assessed against a carbon budget both for building and for all the new traffic the new road would bring.
- New tourist developments to be required to enable low carbon travel

11 Agriculture

From Topic paper Whole Estate Plans secured as part of allowing development or as part of a wider commitment to agricultural or estate improvements and diversification can help influence the management of estates and land and identify eco-system services that land managers may offer to the wider community. Land improvements, especially for carbon management, including rewilding, reestablishment of habitat such as wetland and soil carbon improvement have massive potential for sequestration.

- Suggest that this Whole Estate Plan process to allow more development on agricultural land should include the requirement for Estates to reduce imported fertiliser and herbicide/pesticide use to zero over an agreed period, and to develop higher soil carbon through no till, organic agriculture and potentially permaculture approaches

Rural areas and agricultural production have a vital role to play in increasing local resilience for food and energy in particular.

- Encouraging land use towards increased soil carbon and no till cropping the new Local Industrial Strategy

Evidence

The NFU 'Achieving NET ZERO Farming 2040' goal appears not to recognise the importance of soil health or organic approaches to farming in its development of net zero by 2040. This is not therefore potentially a helpful approach for Cornwall to follow. In particular the NFU suggest high levels of plantation trees for bio-energy carbon capture and storage, which if followed would require some 26% of agricultural land.

- Evidence paper on this can be provided from Dec.19

Not present in Scoping Doc

- Methods of increasing locally based and active travel within the proposed clusters of rural facilities
 - o Whole Estate Plans could include pathways – walking, cycling, electric bikeways etc linking the local rural clusters to reduce car use
 - o Local councils to be involved in local planning of more safe bike and walkways- their lack is at present a major impediment to reducing local car use in rural areas of Cornwall
 - o Needs linking to Transport section

URN 226 – Persimmon Homes

Persimmon Homes recognises the importance of the natural environment and the contribution that new development can make towards reducing the impacts of climate change. Nationally we deliver approximately 750 acres of Public Open Spaces a year and 82% of our new homes are built using Modern Methods of Construction in an effort to help ensure that our new homes are as efficient as possible Persimmon Homes therefore supports the aim of the Climate Change DPD in seeking to ensure that Cornwall meets its climate change objectives.

We do consider that the scope of this proposed document needs to be more focussed than is currently proposed. The current scope strays in to areas of legislative control that would be better dealt with through other avenues than planning policy. This risks increasing the compliance burden unnecessarily, which in turn puts at risk the delivery of the overall aims of the Cornwall Local Plan. We will identify these areas in our responses to specific questions below.

5 The proposal to increase the use of District Heating Systems as a way of reducing carbon emissions needs to be considered further. District Heating Systems remove the ability of consumers to shop around for the energy suppliers and as a result they often pay more than users of traditional energy systems. Given that the Council

has identified that Cornwall has a high percentage of residents which are in fuel poverty a reliance on District Heating Systems has the potential to exacerbate the situation rather than provide a remedy. In addition, due to the relatively low number of circumstances where such systems are used the extra capital cost of providing such systems makes them largely unviable except in circumstances where very large numbers of houses are proposed. It is likely that such a system would only be available where the associated infrastructure is already installed and available for connection.

We would therefore caution against such a suggestion within planning policy that District Heating Systems should be widely investigated.

The Council is suggesting a policy approach based on the following two scenarios: -

Scenario 1 - If new Building Regulations are introduced but the Deregulation Act of 2015 is not fully enacted so that the Council may still set its own Energy Efficiency Standards to exceed Building Regulations. The Council proposes to require a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L or to achieve any higher standard above this improvement required under new national planning policy or Building Regulations together with policy approach suggestions set out under Scenario 2.

Scenario 2 - If new Building Regulations are introduced but the Deregulation Act of 2015 is fully enacted so that the Council may not set its own Energy Efficiency Standards to exceed Building Regulations. The Council proposes the following policy approach :- to require development to follow the energy hierarchy (prioritising energy reduction & energy efficiency first, then renewable energy and finally offsetting residual carbon (allowable solutions)) in accordance with Building Regulations ; to require provision of on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme, that contributes to a further 20% reduction in the residual carbon emissions subsequent to Building Regulations ; to require financial contributions to a carbon offset fund to enable residual carbon emissions subsequent to Building Regulations and on-site renewable generation, where this has not already resulted in carbon neutrality; to require all new dwellings to achieve an estimated water consumption of no more than 110 litres per person per day and incorporate water reuse, recycling and rainwater harvesting wherever feasible and viable to reduce demand on mains water supply; to link design policy to the new Cornwall Design Guide ensuring that design and layout of development results in more sustainable places to live by considering issues such as of solar gain, reduced need to travel, etc. The development of a sustainable construction checklist for planning applications to demonstrate compliance with the new Cornwall Design Guide.

The relatively high number of households in fuel poverty is largely as a result of Cornwall's aging housing stock. New homes are already built to significantly improved standard of energy efficiency. Planning Policies are not able to capture the improvement in existing housing stock except in limited circumstances where external cladding may be proposed in order to improve the thermal efficiency of a home. As Identified within the document, the Government has already proposed the updating of the Building Regulations in order to achieve the national reduction in carbon emissions through the recent consultation on the Future Homes Standard.

Duplicating energy efficiency standards within the Local Development Plan

would be an unnecessary additional burden on the development industry. Planning Policy is slow to adapt to change and the therefore by encapsulating standards within policy there is a risk that the Development Plan could quickly become out of step with national standards contained within the Building Regulations.

It is our view that the improved efficiency standards would be best left to a single technical framework such as the Building Regulations in order to ensure that there is national compliance and understanding.

This is critical for the supply chain to the construction industry as having different standards would result in a loss of economies of scale resulting in increased cost. The risk with increasing the cost of developments is that it reduces the amount of residual funding available for other critical infrastructure such as schools, highway improvement etc.

Persimmon Homes would welcome greater clarity on the requirements for Sustainable Urban Drainage Systems at both submission and determination stages of the application process. The current situation is inconsistent across Cornwall. We are currently delivering 5 major schemes across Cornwall all of which incorporate SUDS however the submission and determination information requirements have been different at all sites. We would therefore welcome a policy clarification that sets out precisely what is required to be demonstrated, issues such as percolation testing timeframes etc. would be particularly useful.

It is important when considering Transportation to refer back to the Cornwall Local Plan Strategic Policies. This document advocates a dispersed development delivery model with development being delivered where it is most needed rather than focussed on the main settlements. With this in mind, the introduction of transportation policies which focus transportation solutions on walking and public transport would

directly contradict the aims of the Strategic Policies. Cornwall is a diverse County much of which is rural and has little or no public transport provision. Whilst there may be a half hourly train service on the main train line, this serves a relatively small proportion of the population and cannot reasonably be cited as a genuine transport possibility for much of Cornwall.

Similarly, whilst bus transport is improving, there are still very high numbers of Cornish residents who could not genuinely use such services to travel to work or for leisure due to the relative infrequency of services. It is the case that car reliance in Cornwall will always remain high. Therefore, developing neighbourhoods that do not cater for cars will result in a situation where parking is not properly managed and is therefore more harmful with cars parked on pavements or in landscaping areas. Any transport planning policies need to be sufficiently flexible to allow for the diverse nature of Cornish communities.

The increase in Electric Vehicle use will result in the reduction of carbon emissions with all petrol, diesel and hybrid new car production due to cease by 2035 the next decade is likely to see an exponential increase in EV usage. Charging provision will need to be carefully considered with users likely to be concerned about the security of their vehicles and particularly the security a charging infrastructure if vehicles are moved to communal parking areas. The Government has already signalled its intention to introduce changes to the Building Regulations to require a consistent approach to the delivery of Electric Vehicle Charging Points in new build properties.

With this requirement likely to come in to force during 2020 it is likely to supersede the delivery of the Climate Change DPD. Therefore, there is no need for the Council to seek to impose planning policy in relation to this issue.

Conclusion - Persimmon Homes supports the aim of Cornwall Council in becoming carbon neutral. However, the scope of the proposed DPD is too wide and replicates provisions elsewhere in the construction industry. This risks inconsistency as frameworks such as the Building Regulations evolve as planning policy is slow to react in comparison. The DPD would be much more effective if it focussed attention on issues which are not dealt with by other frameworks. Increasing legislative and financial burden places the delivery requirements of the Local Plan at significant risk and is also likely to result in the increase in the purchase cost of new houses within the County contrary to the socio-economic aims of the Council.

1.15 URN 231- Centre for Sustainable Energy

Carbon Auditing of Local Plan

We overwhelmingly support the proposed policy content within the Development Plan Document, but this should be set in the context of the overarching duties on Cornwall Council in respect of climate change mitigation and adaptation.

The Planning and compulsory Purchase Act (section 19) and the NPPF (Paragraph 148) require Local Plans to achieve radical carbon emission reductions in line with the Climate Change Act (upgraded to a -100% requirement by 2050). Paragraphs 1 and 7 of the online Planning Practice Guidance (PPG) resource, published by the Ministry of Housing, Communities and Local Government provides further detailed interpretation of the NPPF requirements. The details are summarised in a legal briefing from TCPA and client Earth.

Local Plans are to:

- Take into account baseline emissions
- Robustly evaluate future emissions, considering different emission sources, taking into account requirements set in national legislation, and a range of development scenarios
- Adopt proactive strategies to mitigate carbon emissions in line with the Climate Change Act, a 100% reduction by 2050.

The evidence base should provide an overall carbon budget for the district to 2050, consistent with the updated Climate Change Act. It should show baseline emissions and the impact of development and mitigating policies on this emission curve. Planning legislation and guidance requires that the plan should aim to secure radical carbon reductions in line with a trajectory for the authority area that is consistent with the UK achieving full carbon neutrality by 2050, and in the short term should test the policy options available to achieve the highest level of ambition possible to meet this goal. Your Climate Emergency declaration suggests that the same process should be followed aiming to reach net zero emissions by 2030. A significant amount of the work discussed above will already have been carried out, or will be needed as part of your climate

emergency declaration and the action plan which follows it.

Where local authorities have followed the process of carbon auditing their plans set out in the NPPF and Planning Practice Guidance, the conclusions are often that it would be very difficult to achieve the required carbon reduction trajectory without new development being developed to a zero-carbon standard, due to the additional emissions growth inherent in new development commitments. Thus, following the process set out in legislation, planning policy and guidance to the letter will support the need for the ambitious zero carbon policies proposed for new development, and provide the context for your other climate mitigation policies, for example positive policies for renewable energy, and policies to decarbonise transport.

The Tyndall Institute provides a free tool to provide a science-based carbon budget by local authority area, based on the Paris Climate Accord commitments: <https://carbonbudget.manchester.ac.uk/reports/>

Some authorities have used the SCATTER tool (Setting City Area Targets and Trajectories for Emission Reduction) which support local authorities and city regions to standardise their greenhouse gas reporting and set targets in line with the Paris Climate Agreement. <https://scattercities.com/>

Renewable energy Yes, you've picked up the right issues, and we strongly support the approach Cornwall Council is taking to allocate suitable locations for renewable energy development, however we'd add a few minor points. Within the issues and implications section, we would suggest adding a short mention of the economic arguments in favour of renewable energy development. The Energy Island idea which Cornwall developed a few years ago is a strong economic narrative in favour of renewable energy development, to reclaim some of your regions energy spending in your local economy. In Cornwall, with abundant renewable energy assets, renewable energy development can contribute significantly to Cornwall's economic recovery and to building back better. Potentially your Supplementary Planning Document isn't the place to make these arguments, but they should be made.

We welcome that the DPD is considering the role of geothermal and offshore wind. Whilst there might be uncertainties about when these technologies will become available and where they might roll out, the DPD should do all it can to provide a supportive policy structure for them. We have seen the great speed at which the cost of both solar and offshore wind have fallen, and therefore these technologies might come forward sooner than expected.

Missing from your steps to reach carbon neutrality is mention of the role communities can play, and we would suggest that a further bullet point be added:

- Enabling and supporting communities to develop their own renewable energy projects.

2. Are the policy approaches that we are suggesting about right – is there anything missing?

As discussed above, we'd suggest a further bullet point:

- Provide policy support and access to available evidence to enable and facilitate community energy projects going ahead.

Finally if the intention is to revise the text of local plan policy 14, it would be good to give explicit weight to the contribution of renewable energy to meeting your climate emergency declaration, as Stroud have done in their draft local plan below. I note also that Stroud also don't rule out renewable energy developments within the AONB but have just changed the weighting given to landscape and other harms. Whilst small scale renewable energy developments are more likely to be more acceptable within the AONB than large scale schemes, the policy should be worded to control the visual and landscape impacts of development rather than place absolute prior limits on their scale. I.e. if large output renewable energy developments are able to be proposed within the AONB without giving rise to significant harm to the designated area or its setting, they should be allowed to go ahead.

Mine water and geothermal energy We support the policy approach sketched out, though using mine water as a heat source isn't a mainstream technology, and therefore I have doubts as to whether on the basis of an "encouraging" policy alone many mainstream house-builders will wish to exploit this, due to perceived risk / cost / time issues.

Is this somewhere that the council or a body appointed on behalf of the council could act as an intermediary so as to de-risk the use of this resource for housebuilders? Please accept my apologies if this has already happened and I am unaware.

There would be potential to link mine water and geothermal energy with allocations in neighbourhood plans, but if this is the route taken, neighbourhood planning groups will require significant support in creating policy to exploit this potential. Would it not be better to handle this technical area primarily through the DPD itself,

with consultation with affected communities as to what the impacts of exploiting mine water heat might be? Energy efficiency Within your discussion of fuel poverty, it would be good to mention areas of the county which are off-gas (and dependent on more expensive oil or electric storage heaters) and the condition of your housing stock (which I suspect may be quite energy inefficient). Both these factors contribute to higher levels of fuel poverty.

8. Are the policy approaches that we are suggesting about right – is there anything missing?

My understanding of section 7.3 is that in both scenarios your objective will be that with maximised fabric efficiency standards (as far as it is possible to go within the scope of regulations as amended) on site renewables and carbon offsetting, new development will be net zero carbon. If that's the case, we strongly support both policy scenarios.

We give particular support to taking these technical policies forward in an integrated fashion with your design guide, to ensure conflicts are avoided where possible between the council's positions on design and sustainability and the advice given to applicants from different internal consultees.

We also welcome the proposal for a policy supporting the responsible retrofitting of historic and traditional buildings. If possible this should be accompanied by supplementary planning guidance which define responsible approaches to retrofitting common types of historic building found locally, like the guidance produced by Bath and North East Somerset Council below:

www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Sustainable-and-Retrofitting/scrif_adoption_draft_spd.pdf

www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Sustainable-and-Retrofitting/listed_building_guidance_-_energy.pdf

We would suggest that your responsible retrofit policy is backed up by training for conservation officers, to ensure the council offers proactive and supportive advice to owners of historic properties on their options for achieving carbon and emission reductions, ideally linked to pathways to help them implement and fund these improvements. For instance, replacing their original wooden windows with double glazing might be out, but they might achieve the same objective (a warmer, greener home that's cheaper to heat) by draught proofing their windows or installing secondary glazing, insulating the loft, fitting thermal curtains, upgrading their central heating system (ideally to a renewable alternative) with improved controls.

Carbon offsetting

CSE have advised both the four West of England Authorities around Bristol and the Greater Manchester Combined Authority in detail on how a carbon offsetting regime attached to their planning policies might be set up and administered. Our report to the west of England authorities, with many recommendations which might be relevant to Cornwall's situation, can be viewed here:

www.bristol.gov.uk/documents/20182/3368102/Carbon+Offsetting+in+the+West+of+England.pdf/894f7c11-33e4-a8b4-ec89-383828553184

CSE's view is that carbon offsetting is a valuable tool in achieving net zero development but only in the short-term, until regulation and the development industry delivers true zero or negative carbon development; and within current construction sector, only once the potential for economically viable carbon savings from fabric efficiency and on-site renewables have been exhausted.

In the context of a binding national commitment to net zero carbon by 2050 and a commitment within your climate emergency declaration to net carbon neutrality by 2030, allowing a carbon emitting development to go ahead because it funds the retrofitting of another building does not make sense, because ultimately (whether by 2030 or 2050) all buildings will need to be zero carbon.

Also, carbon offsetting sits uncomfortably with your climate emergency declaration. If it is to feature as a tool to honestly deliver net zero emissions by your 2030 deadline, the carbon saved by offsetting must also be saved by this deadline, yet this not how carbon offset regimes work. Instead the carbon savings or reductions delivered from the measures funded are calculated over a 30-year period (e.g. 30 years' worth of tree growth) or over the measure lifetime. The effect of this is to delay the point at which the full carbon emission saving, or reduction is actually made. As a result, carbon offsetting, at least how it currently operates isn't easily compatible with hard deadlines for zero carbon.

In administering carbon offsetting schemes, it is also problematic to demonstrate that the carbon savings achieved by carbon offset funding are genuinely additional to what would otherwise have happened, and this must be proved if carbon offsetting is to genuinely contribute to achieving zero carbon development.

Finally, it's accepted that rarely will a carbon offset scheme offset carbon at a rate of 1:1 (1 tonne abated by the scheme for 1 tonne's worth of residual carbon from development) and this convention is written into the GLA guidance on carbon offsetting.

Overall carbon offsetting is a necessary evil; it is useful in adding to the carbon emission reductions that can be achieved on site but is no substitute for policies which directly reduce carbon emissions from new development.

9. We are undertaking a refresh of our Strategic Viability Assessment to support these policies, but do you have any other comments on the likely impacts on viability of the policy suggestions?

The West of England Authorities' shared evidence base suggests that it is possible to achieve net zero regulated carbon emissions from a combination of energy efficiency (10% improvement beyond building regulations) on site renewable energy and allowable solutions for an additional capital cost of between 5-7% for homes and non-domestic buildings. Achieving net zero regulated and unregulated emission is likely to result in a cost impact of 7-11% for homes in these areas at the time of the report.

The Green Building Council policy playbook provides links to other viability studies already in the public domain.

10. Is there anything else that should be included in this thematic area? Unless the revised building regulations set out specific technical standards for avoiding overheating in new buildings (and this was promised in the Future Homes consultation this spring but hasn't yet emerged) the local plan should include a specific overheating policy. This approach from the London Plan is quite comprehensive.

The plan then refers to Pass / fail guidance from the Chartered Institution of Building Services Engineers (CIBSE) on assessing and mitigating overheating risk in new developments.

12. Are the policy approaches that we are suggesting about right – is there anything missing?

We support that the outputs of the Shoreline Management Plan are to be translated into planning policy through the creation of Coastal Vulnerability Zone or Coastal Change Management Areas.

We welcome the proposed exceptions policy to allow the migration of existing housing and vulnerable uses away from Coastal Erosion areas. This will help homeowners relocate and may reduce the costs of doing so, by reducing the land and property costs as happens with agriculturally tied dwellings. Accepting that these exception sites are by their nature likely to be outside settlements, thought should be given to the sustainability of possible development locations. Could these exception sites be limited to sites adjacent to existing settlements?

Section 8 rightly deals mostly with areas identified for "managed realignment" or "no active intervention" within your Shoreline Management Plan (SMP). My understanding is that Shoreline management plans make recommendations on management approaches to inform planning policy, but don't come with funding to deliver on these recommendations. Is funding therefore secured to pay for coastal defences in those areas where the SMP recommends to "hold the line" and how is this to be dealt with in the plan?

We welcome the proposal to pursue Natural Flood Solutions to reduce the carbon footprint of traditional flood defences and upstream catchment management techniques which also deliver other ecosystem services. In certain situations, where broad ecosystem services are delivered, there may be potential to combine other funding streams, funding from your carbon offset fund for carbon sequestration, and biodiversity net gain funding, as well as flood mitigation funding.

13. Should we designate CCMA's or set out candidate areas and work with communities to designate them as appropriate throughout the plan period?

It seems odd to leave the designation of CCMA's to Neighbourhood Plans since such a designation could easily result in planning blight for affected communities, and difficulties for homeowners, since such designations do not come with compensation to allow homeowners to relocate. Cornwall Council should designate CCMA's to provide certainty to developers and safeguards to new homeowners to avoid them moving into harm's way, whilst working with communities to explain their significance, and your strategy to allow relocations where necessary.

14. Is there anything else that should be included in this thematic area?

9 Natural climate solutions

15. Have we picked up the right issues – are there any more that you would add?

16. Are the policy approaches that we are suggesting about right – is there anything missing?

We strongly support the natural climate solutions proposed, which address the climate and ecological crisis

simultaneously.

The consultation considers carbon soil capture but doesn't mention safeguarding your existing carbon sinks. Policy should be developed to ensure that existing carbon sinks, such as peat and blanket bogs are protected from development. Much of the natural climate solutions work falls beyond the direct control of the planning system, and developers are unlikely to be able to deliver much of this work. You will need to think about delivery mechanisms for this work. Greater Manchester Combined Authority is planning to adopt a carbon offset regime and is also considering setting up a Greater Manchester Environment Fund which would target many of the same objectives. My contact there is Helen Telfer: Helen.Telfer@greatermanchester-ca.gov.uk. The best approach to ecosystem services policy I've seen is from South Downs National Park.

Their approach ensures the services that nature provides us (such as wood fuel, clean water, health and well-being) from nature's own 'capital' (timber, water, fresh air) are factored into decision making and allocations. I have yet to fully understand how practically this is done, but the authority has mapped ecosystem services across the authority area, and then the site allocation process has examined the main ecosystem service priorities within each allocated site and incorporated these priorities within site allocation policies. This seems like an excellent way of setting mitigation and adaptation priorities for allocated sites, without having to develop development briefs for each one. This approach could also provide an opportunity to set out expectations that significant allocations should incorporate district heating infrastructure, if heat mapping should there is potential.

Bristol Local Plan policy CCS3 takes a nature based approach to climate adaptation, incorporating the need for green and blue infrastructure.

Section 9.3 discusses stricter controls over felling of trees on development sites and a tree replacement policy. Bristol City Council's policy requires multiple trees to be planted to compensate for trees being removed, according to the size of the tree lost, recognising the greater amenity and biodiversity value of older, bigger trees. See the approach below from Bristol City Council, linked to Core Strategy policy BCS9. Their approach increases the cost to developers of removing trees, encouraging a more considered approach to layout and siting.

Table 1 - Extract from Bristol City Council - Planning Obligations Supplementary Planning Document-
Could your policy include a target to increase tree cover across Cornwall?

17. Is there anything else that should be included in this thematic area?

10 Transport

18. Have we picked up the right issues – are there any more that you would add?

The policy context section should be updated in the light of the Coronavirus, both the response from central and local government and changing public habits.

Recent guidance from the Department for Transport states:

“The government ... expects local authorities to make significant changes to their road layouts to give more space to cyclists and pedestrians. Such changes will help embed altered behaviours and demonstrate the positive effects of active travel.”

Many local authorities have taken radical actions in the last few months, creating cycle lanes and reallocating road space to pedestrians, resulting in several decades' worth of cycle infrastructure being provided or planned in a matter of weeks, some of which may become permanent. At the same time, cycling has increased hugely. The lockdown has shown people what they could have with a sustainable transport system, clean air and skies, quiet safe streets for cycling, more wildlife.

This section should also refer to the Department of Transport publication “Decarbonising Transport”. Why this has not yet been informed the National Planning Policy Framework, the direction of travel is clear, to “accelerate the modal shift to public and active transport:

- Help make public transport and active travel the natural first choice for daily activities
- Support fewer car trips through a coherent, convenient and cost-effective public network; and explore how we might use cars differently in future
- Encourage cycling and walking for short journeys”

In summary, events, public attitudes and government policy converge to offer a once in a lifetime opportunity to change public expectations and behaviours around transport. The Local Plan should take advantage of this

context to incorporate the most ambitious transport policies possible, consistent with its climate emergency declaration.

It would be good to model the scale of modal shift needed in order to deliver on your climate emergency declaration and develop your transport policies in the context of this analysis. CSE and others have undertaken this work for Bristol City Council. Our study found that to achieve net zero by 2030 a nearly 50% reduction in car miles is necessary, returning them to levels seen in the mid-1980s, driven by a significant effort to shift travel to public transport, cycling, walking to a modal split more like Amsterdam.

Also missing from the policy context section are narratives around public health and air quality, which both reinforce the need for the kind of policies you are proposing.

Finally the coronavirus has forced many people to work from home, and these new found habits will almost certainly change long term behaviour, probably cutting transport related emissions, but home working is dependent on having high capacity broadband, which may be a problem in rural areas. Is the rollout of broadband dealt with in the plan somewhere, or in a related strategy?

19. Are the policy approaches that we are suggesting about right – is there anything missing?

We support the policy approaches suggested. I would suggest that policy specifically requires new major development to incorporate or fund the provision of high quality segregated cycle routes and direct and safe pedestrian infrastructure (compatible with social distancing) commensurate with the scale of development and trip generation. Policies allocating major sites for development could explicitly identify key segregated cycle routes needed.

Missing from the policy is consideration of how existing barriers to cycling and walking can be addressed. Within many urban areas, over-engineered junctions and roundabouts create threatening environments for pedestrians and cyclists, deterring cycling and walking and reinforcing car dependency. Within your public consultations, there is potential to invite residents to identify and map these locations for consideration by your highways team and further public consultation, to see whether they could be downgraded. In Bristol this approach is releasing formerly highways land for re-development, turning urban roads and roundabouts into more human streets, increasing densities, accommodating housing and employment in central, accessible locations and further encouraging modal shift, whilst minimising costs to the public purse.

20. Is there anything else that should be included in this thematic area?

11 Agriculture and rural development

We support the main thrust of policy, to support densification within town centres and exploit opportunities for living above the shop, whilst considering shrinking town centres, however your proposal doesn't address big box retail sheds and out of centre shopping areas. As discussed in your consultation, whilst the vitality of traditional town centres is threatened, they are best adapted to a zero-carbon world, shaped around pedestrian access and typically positioned at the heart of the communities they serve. In contrast, out of centre shopping centres, predicated on car access and often located in positions convenient for car access, are ill suited to a zero-carbon future and retrofitting them with cycle paths and walking routes is expensive. Retail floorspace may need to shrink for the reasons you give, but you should still retain a town centre first approach. I'd suggest the council explores the potential to re-develop and densify areas of big box retail sheds, particularly in the light of disruption from the Coronavirus. This could either be through combining and rationalising car parks to release housing land (where they have the scope for good quality living environments) or through wholesale re-development.

Your strategy of encouraging the reuse of upper floors and disused is welcomed, however whilst much of this development doesn't need planning permission in the first place, these opportunities are nevertheless under-exploited, possibly due to absentee landlords and the need for land assembly. Beyond your proposed policy, which is welcomed, further market interventions may be necessary in order for this strategy to work fully including promotional efforts through your economic development team.

We support the move away from zoning of A1/A2 retail space to a more flexible mixed uses.

1.16 URN 256 Vattenfall Wind Power

In response to CCCs' consultation on its developing Climate Change Development Plan, please see below our comments:

Cornwall Council's recognition of the need for all of society to act collectively and decisively to avert severe climate change is a positive and Vattenfall commends Cornwall Council for its action in Declaring a Climate Emergency, setting up a climate change team, preparing the Climate Change Development Plan Document and the ambitious target of Net Zero by 2030. Vattenfall welcomes the opportunity to respond to the Climate Change Development Plan Document consultation and going forward is keen to assist Cornwall Council in developing climate change solutions.

Cornwall has been at the forefront of renewable energy innovation and expertise with its long mining and engineering history leading to the development of the Hot Dry Rock geothermal project back in the 1970's, hosting the first commercial wind farm at Delabole nearly 30 years ago, and of course the world class renewable energy university education and research and development facilities at Tremough Campus in Penryn. The Committee on Climate Change state that the UK needs a pipeline of 30GW of onshore wind to be on track by 2030 to meet net zero. This is an achievable but challenging target, currently the UK is at just under 15GW. So, there's no room for complacency, some people think certain parts of the country have 'done enough' but we all need to pitch in more to be able to reach Net Zero in time.

Vattenfall UK has been developing, constructing and operating wind farms both onshore and offshore in the UK from its team in Penzance for 10 years, is proud to employ 20 highly skilled and expert Cornish men and women and invested more than £3.5 billion in low-carbon infrastructure in that time. We estimate our wind investments have supported 1,800 direct jobs and 6,700 indirect jobs over 10 years. Vattenfall's next 10 years of investment could be 3,100 direct jobs and 34,000 indirect jobs across the UK. The UK has the best wind resource for western Europe and Cornwall has its fair share of the wind and is the sunniest place in the UK not to mention the geothermal energy in the granite below ground making Cornwall rich in renewable resources. Cornwall has been contributing to reducing the country's carbon footprint for years and has the potential to play an important role in our journey to Net Zero.

The costs to society of not acting on climate change are greater than the costs of dealing with the effects of climate change. Recently the Climate Change Committee estimated net zero would cost 1-2% of GDP annually to meet and this is green growth which could benefit Cornwall's economy. A key issue is about ensuring the path to Net Zero is a 'just transition' with UK jobs and local environments prioritised. This is especially pertinent for Cornwall where many jobs are low income and seasonal, Cornwall needs to build a resilient green economy and its renewable energy resources should be a major part of its path to Net Zero.

The potential for both onshore and offshore wind energy in Cornwall is significant. However onshore wind farm development is currently hampered by the changes to both the planning system that the government brought in 2015. The changes introduced to the planning system prevented local planning authorities granting planning permission for new onshore wind farms unless they are within an area identified suitable for wind development in a Local or Neighbourhood plan as detailed in the Written Ministerial Statement HCWS42 remain. Vattenfall would therefore request that Cornwall Council considers its onshore wind resource and works together with communities, stakeholders and industry to designate areas suitable for onshore wind development. Vattenfall is ready to work with Cornwall Council and the community as industry members to assist in this process and ensure Cornwall and its community benefit from clean energy and have the opportunity to own a community share in their local wind farms.

The Climate Crisis goes hand in hand with a Biodiversity crisis with huge habitat and wildlife losses threatening ecosystem collapse. Without a healthy and diverse ecosystem society will not survive.

Both onshore and offshore wind farm projects offer important opportunities for significant Habitat Restoration where biodiversity loss can be reversed.

1.17 URN 258 Skinflint

As a small business owner in Cornwall Employing 10 people I welcome your efforts to engage and assist with Cornwall becoming CO2 neutral by 2030.

Having read the DPD document I would like to share my thoughts.

Local businesses in all sectors need clear guidance and support for realistic and achievable target setting on becoming Carbon Neutral.

We are happy to share our practice widely having undertaken our first carbon audit (with the intention of honesty not greenwash) <https://www.skinflintdesign.com/blog/sustainability/the-results-of-the-skinflint-carbon-audit-2019> nd declaring climate emergency <https://www.skinflintdesign.com/blog/sustainability/skinflint-declares-a-climate-emergency>

I think all businesses need to be encouraged and supported to do this and to receive clear education about the emergency we are currently in. Business as usual must stop.

In addition to this I note the following: We need to invest in building resilient carbon neutral communities. This will mean planning laws need to change to make such projects a priority.

Sustainable development- investment in teaching sustainable land practices and special dispensation for sustainable planning, Zero carbon building and Small-scale community eco projects. There also needs to be a relaxation in laws around applications for Listed buildings- such as putting in double glazing to listed properties.

renewable energy - some good ideas but I believe you also need to promote people simply consuming LESS ENERGY. Renewable energy projects also need to have fast track approval process. These things need to move fast. At the moment planning can take years- we just don't have time. There could be some funding and incentives for local communities to have wind turbines. In addition funding and incentives for zero energy use. If we can decrease demand for power rather than try to accommodate increasing demands then that will have a direct and positive impact on emissions A note on 7.2- if building sector accounts for 18% of emissions and we want to be zero carbon by 2030 then why are emissions set to fall by 95% by 2050? Surely the need to be 100% by 2030 The council should introduce new policies to enable funding for insulation and no planning permission on external cladding as long as cladding or insulation is safe and zero carbon. Carbon offsetting is NOT a solution. It takes decades for a tree to get to the stage it is absorbing carbon. Time we don't have

Incentivise adoption of greywater harvesting in existing properties- for landlords too as there are many properties owned by landlords and let (inc holiday properties)

Regarding the Transport section- there's one glaring omission: Newquay Airport and the proposed Spaceport for Virgin. Cornwall council needs to stop subsidising and supporting the airport; its existence is incompatible with a world in the grip of a climate emergency.

Instead, energies should be focussed on lobbying for an upgraded mainline rail service and affordability of a currently crippling expensive local bus service. Also there should be investment in cycle lanes and funded bike schemes to help get people out of cars and onto bikes and public transport.

Biodiversity: Ban the use of glyphosate weed killer on all council owned non agricultural land- we need to encourage plant, animal and insect biodiversity. In addition, develop a simple model for communities to take over custodianship of their local greenspaces, supporting them in planting trees and wildflower areas. Support and education also need to be provided for home owners and farmers around use of weed killers and their impacts on biodiversity. We need to protect our biodiversity, to understand and educate that we are part of a web of life. And every action we take will impact elsewhere in that network.

1.18 URN 270 Climate Vision

I have a few comments. 1. The whole thing needs to include a separate Communications Strategy as a theme, speaking to each section, given equal importance and resource. You and the 25 Year Plan call for ‘everyone to take part’. However, unless you are in this community and read the 25 Year Plan, you would not know that. The reason we are in the predicament we are in, is because it is not the norm to know about it, no read about it nor desire changing habits for it. Fundamentally there is nothing communicating this regularly. When we converted Cornwall into a kerbside recycling success, it was based on getting recycling put in EastEnders, making sure the important media streams were onside (Radio Cornwall lunchtime – important because half of Cornwall listen to it whether we like it nor not), but most of all it was made as easy as possible, and finally and key – where the successes were - people understood well – why they were doing it. For example, high recycling rate homes knew the glass went into the A30, the plastic bottles went into carpets – we talked about the next life. People need to know why and support it. No-one is doing that, except go-to resources for people like us, who are interested. We need to influence behaviour change in a massive way. Like me, graduates are falling out of Tremough with degrees heavily focussed in this. 2. 8.1.6 The 2019 NPPF (165); major development should only be allowed in areas of flood risk where it can demonstrate STOP. While that is national policy, it should not be the case. No development should be allowed in areas of flood risk, ever. It is criminal it is even thought about and indicates a massive misunderstanding throughout government. While people reading this will think I’m mad, look at my commitment to his topic in my signature, with 2 decades, mostly voluntary, to build in flood risk zone is terribly unaware sorry. No, we do not need to build for the population growing, we need to send a clear signal to the population that numbers cannot grow, and the for the numbers we have to live safely, we need to change significantly.

3. In 8.3.1 Require a contribution to NFM....to add “and other initiatives currently being explored e.g. Beaver” Even if you don’t say Beavers, we need incite the topic that there is much to do beyond tree planting.

1.19 URN 271 - Sambar Power Ltd

In overall terms, Sambar Power welcomes the declaration of a Climate Change Emergency by Cornwall Council and fully supports the preparation of a Climate Change Development Plan Document CCDPD to provide a statutory framework that will sit alongside adopted climate change in the local plan. We note that the scoping report is the first stage in the DPD preparation process and confirm that our client is keen to remain engaged throughout the process.

The Scoping Report sets out the Councils ambition to be carbon neutral by 2030. Whilst Sambar Power applauds the Councils ambition, we are concerned that the scope of the policies presented in the scoping report do not fully recognise the need for a ‘whole energy system approach’ The focus on renewables is undoubtedly correct, but other technologies will be required to facilitate the level of renewable deployment

needed in Cornwall to deliver the Councils ambition. It is our clients considered view that the CCDPD must take a whole energy system approach if carbon neutrality is to be delivered.

The rationale for this position and the areas where we feel the CCDPD needs to widen its scope are set out in this letter. As context, we have also set out the background to our client's interest in the CCDPD.

Introduction to Sambar Power Ltd

Sambar Power is proposing the development of a natural gas fired reserve power generation facility on existing industrial land north of the B3279, and adjacent to the SGP substation in Indian Queens. The facility will comprise gas reciprocating engines and operate as a "peaking Plant that will provide power to the electricity grid at times of peak demands and have a total generating capacity of up to 49.5 megawatts (MW) It's is anticipated that the facility would operate for less than 2500 hours per year (less than 30% of the time) and that this will be screened from the surrounding area and will be services by underground gas and electricity connections to minimise any potential visual impact. Once operational traffic movements will only be required for weekly maintenance visits. The facility would have an operational life span of around 25 years and as such would provide a vital support mechanism during the UK and Cornwall's transition to a decarbonised economy.

The generating equipment employed by the project would be capable of burning green gas such as hydrogen or bio-methane should that become available during the lifetime of the plant.

The need for peaking capacity is a vital part of the energy system required to support the largescale deployment of renewable energy and the transition to a low carbon economy. Gas fired peaking plants provide a very fast response to high levels of demand for electricity at times when renewable energy technologies are unable to generate, Peaking plants are designed to operate efficiently for short periods of time., utilising appropriate mitigation to meet noise and air quality regulations.

The need for peaking plants is identified in National Grid's latest Future Energy Scenarios (FES) July 2019. Report. The 2019 FES also highlights the need for a whole system view across electricity, gas heat and transport, if a sustainable energy transformation is to be achieved. The FES sets out 4 potential scenarios for the future of the UK's energy system, two of these scenarios – 'Community renewables' and 'Two Degrees' – must meet the Government's commitment to be net zero by 2050.

All scenarios in the 2016 FES see total electricity demand continuing to rise steadily from 2040 onward. And gas fired generation plays an important role in meeting this demand across all four scenarios. The Latest FES recognises *that*

Gas fired power stations continue to play an important part in the GB electricity generation mic, both in terms of larger plants like transmission connected CCGTs, as well as distribution connected or onsite small gas reciprocating engines, with the recent and continuing growth in renewable intermittent forms of electricity generation, thermal plant offer flexibility services.

The FES confirms that, currently gas fired peaking provide one of the primary sources of flexibility within the UKs energy system as they are able to provide extra generation at very short notice. These technologies provide additional supply when the generation from renewable energy is low (due to its weather-dependent, intermittent nature). The only scenario to meet almost all electricity demand from other sources is community Renewables, but even in this scenario, gas fired power has a role in providing flexibility through the energy generation of small scale peaking plants.

The table below shows data taken from the FES 'two degrees scenario, which indicates that although a significant amount of gas fired generation is expected to remain available up to and including 2050, the utilization of that capacity is dramatically reduced over time (as the system utilised gas-fired generation for grid balancing as required.

		2018/19	2030	2040	2050
Gas Fired	Installed Capacity (GW)				

Generation		36.7	30.4	18.0	13.2
	Generation (TWh)	6.4	10.5	3.7	5.5
Renewable Regeneration	Installed Capacity (GW)	43.0	No data	89.4	133.7
	Generation (TWh)	124.9	240.7	299.9	339.8

The role of gas-fired power generation in the UK's energy system is also set out in the National Policy Statements (NPSs) for energy infrastructure (specifically the Overarching NPS for Energy (EN-1) and the NPS for Fossil Fuel Electricity Generating Infrastructure (EN-3)). These NPSs confirm that there is an urgent need for new electricity generating capacity in the UK. Including gas fired generation, to ensure the security of national electricity supplies and to provide back-up generation as the UK electricity supply as set out in the NPSs should be reflected in the CCDPD. This would be in accordance with paragraph 5 of the National Policy Framework (NPPF) February 2019) which states:

National policy statements form part of the overall framework of national planning policy, and maybe a material consideration in preparing plans and making decisions on planning applications.

NPS EN-1 recognises the continuing role of fossil fuel generation in terms of complementing other types of generation, notably renewables, providing vital flexibility and resilience to support an increasing amount of low carbon generation in the UK's energy system, and ensuring security of supply. NPS EN-1 states:

"Some renewable sources such (as wind solar and tidal) are intermittent and cannot be adjusted to meet demand. As a result, the more renewable generating capacity we have the more generation capacity we will require overall. To provide back up at times when the availability of intermittent renewable sources is low. (Paragraph 3.3.11)

...it is possible that even when the UK's electricity supply is almost entirely decarbonised we may still need fossil fuels stations for short periods when renewable output is too low to meet demand, for example when there is little wind" (paragraph 3.3.11)

[fossil fuels generating stations] *"Can be brought online quickly when there is high demand and shut down when demands is low, thus complementing generation from nuclear and the intermittent generation from renewables..." (paragraph3.3.11)*

In light of the above, the role of gas fired generation within the energy system cannot be under stated and its significance is arguably increased during the transition period as a way to facilitate the large scale deployment of renewable technologies, and the decarbonisation of heat and transport. It is imperative that the current thinking and scenarios of the system operators and the provisions of NPSs are reflected in the CCDPD. Our position on the changes required to the CCDPD to address this are set out below:

Climate change Development Plan Document (Scoping Report)

It is Sambar Power's view that if the CCDPD is to be effective, it will need to reflect the NPSs and the predicted scenarios and expertise of system operators and provide clarity on the Councils view of what constitutes a flexible, operable and sustainable whole energy system. This means that the scope of the CCDPD must not focus solely on renewables, either during the transition or in the future, as such a focus could be counter-productive.

The Challenging Target

The target of carbon neutrality by 2030 is an ambitious one that Sambar Power applauds. However, Sambar Power is also concerned that the target may be difficult to achieve if a 'whole energy system' approach is not taken. We are pleased to note that the challenge ahead is recognised by the Council (CCDPD para 1.0.2) as are the issues the Council faces going moving into the future:

- Demand for electricity is expected to double over the next 50 years.
- Cornwall currently creates enough renewable energy to meet a third of existing demand and

- To achieve carbon neutrality, it is estimated that 5 times the existing installed capacity will be required (based on increased general demand and the additional electrification of heat and transport).

It is clear that a significant level of renewables deployment will be required, and the wider system infrastructure must be in place to facilitate this. Failure to recognise the role of alternative technologies in a carbon neutral energy system, particularly grid balancing mechanisms such as peaking plants, could jeopardise the deployment of renewables required to meet the Councils targets.

The CCDPD Scoping Report has been informed by the 'Climate Change Action Plan' (CCSP) (July 2019) which sets out the Councils anticipated journey to carbon neutrality, including a transition to smart grid system operation, stoppage and strategic grid reinforcements. The definition of carbon neutrality is set out in the CCAP as follows:

"Achieving net zero carbon emissions by balancing a measured amount of carbon released with an equivalent amount sequestered or offset."

By opting for a Carbon neutral target, the Council appears to have accepted that some carbon producing activities will still be required but that any carbon production will be offset or sequestered. The carbon neutral ambition therefore clearly has scope for gas-fired generation to be included as an inherent part of the whole system energy mix for Cornwall. It is our view that peaking plants will contribute to the strategic reinforcement of the grid required by CCAP, and we would welcome recognition of this in the CCDPD. Importantly, the CCAP also recognises the scale of the challenge that faces the Council.

"it cannot be stated strongly enough that to meet the ambition of the motion by 2030 will be incredibly challenging. It is not yet clear whether it is an achievable goal and, it may prove to be impossible, however, it is an ambition the Council is prepared to pursue in good faith and endeavouring to achieve the goal will take us further than backing off this challenge. The evidence shows that the scale of change is unprecedented".

We note that the CCAP sets out an objective to work with Western Power Distribution (WPD) to *"strengthen the distribution grid and support the transition to a smart grid capable of meeting the requirements of a carbon neutral Cornwall"*. Sambar Power supports this objective and encourages collaboration between the parties in a whole system approach, particularly as WPD launched the UK's largest flexibility market in January this year to help them meet peak demand on the network.

Renewable Energy Generation

Sambar Power fully supports the inclusion of Renewable Energy Generation within the CCDPD. Although it is considered that the policy approach proposed fails to recognise that other technologies are required to facilitate widespread energy generation from renewable sources.

The CCDPD is being prepared in the context of the National Planning Policy 2019 (NPPF), along with identifying the role of NPSs in plan making, the NPPF also has specific provision for renewable low carbon energy. It states that plans should:

"Have a positive strategy to promote energy from renewable and low carbon sources that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)".

This provides a clear message that low carbon projects should be part of the energy mix going forward. It is our view that the CCDPD must reflect this, together with the need for grid balancing to deliver renewable development at the scale required to meet the Council's ambitions. The CCDPD should also clearly the support for renewable and low carbon development provided by paragraph 154 of the NPPF which state that applicants should not be required to demonstrate the overall need for renewable or low carbon energy as even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions.

Paragraph 6.2.1 of the scoping report sets out that the DPD should encourage investment in the right types of renewable technology and associated infrastructure. The scoping report does not however provide a clear definition of what is classed as associated infrastructure. It is our view that this should include gas peaking plants in recognition of the critical role they play in facilitating the deployment of renewable energy.

Paragraph 6.2.2 sets out the Council's steps to help reach the aim for carbon neutrality. We consider that these should include a step that seeks to provide a positive policy approach to support the energy storage and grid balancing facilities required to facilitate the required scale of renewable energy deployment.

It is noted that section 6.3 sets out the policy and allocations options that have been identified as a suitable basis for the development of policy to help achieve carbon neutrality =. The option to provide supportive

policy for other technologies is supported by Sambar Power, but the CCDPD needs to be clear that this will include peaking and storage technologies.

Natural Climate Solutions

With respect to the natural climate solutions set out in section 9 of the CCDPD, it is Sambar Powers view that the CCDPD should only include a biodiversity net gain policy that is in line with the provision of the environment bill.

Summary of Representations

Sambar Power Ltd support the Council’s climate change objectives but consider that other energy generating technologies need to be recognised and supported in order to complete the transition to carbon neutrality. IN response to the specific questions set in the scoping report, Sambar Power Ltd consider that the CCDPD:

- Must take a whole energy system approach and recognise the need for a mix of technologies to deliver decarbonisation – this applies to both policy and the thematic areas covered in the CCDPD;
- Must reflect the NPPF and the relevant NPSs;
- Identify the role of peaking plants within the energy mix as facilitators of transition to the level of renewable energy deployment required to meet the Council’s carbon neutral ambition;
- Consider a policy provision for non-renewable energy developments to demonstrate carbon reduction through other means, e.g. carbon sequestration and offsetting;

In terms of the policy approach suggested in section 6.3 Sambar Power’s considered views are set out below:

Suggested policy approach	Comments
<i>Provide broad allocations of land suitable for the installation of major renewables and associated infrastructure, including criteria for consideration of impacts of the development (including cumulative impacts), and any requirement for particular layouts or clustering of turbines to reduce landscape</i>	The use of a criteria based approach to the consideration and assessment of planning applications for energy development is supported. However, land allocations are not considered necessary as the locational drivers of energy projects are generally associated with the ability to connect to the

Suggested policy approach	Comments
<i>impact. Clarify community support requirements and requirements for providing community benefit from installations.</i>	grid. Site allocations could therefore unintentionally limit deployment.
<i>Set out policy for the siting of other major renewables including solar arrays and the selection of sites, particularly in relation to agricultural land classification</i>	As above, a criteria based approach is considered appropriate.
<i>Set policy for the requirement of biodiversity net gain and/or environmental growth as part of the layout of renewables installations.</i>	Any biodiversity net gain policy should directly reflect the provisions of the Environment Bill.
<i>Set out policy relating to the siting and design of storage facilities.</i>	This policy should extend to other technologies that will facilitate renewable energy deployment and deliver a flexible and resilient whole energy system (including gas peaking plants).
<i>Set out policy relating to the safeguarding of renewable resources, including geothermal.</i>	No comment.
<i>Provide positive policy relating to the provision of domestic scale renewables.</i>	No comment
<i>Provide supportive policy for other technologies, including hydropower</i>	This policy support should extend to technologies (including gas peaking plants) that will facilitate renewable energy deployment

1.20 URN 285 ZLC Energy

Tell us the two things that concern you most about Climate Change?

- 1, An inhabitable planet for my children & grandchildren to have to deal with & that I let them down in failing to preserve it for them
- 2, That humans can understand such a threat for so long and, whilst having the tools to positively act, to not act due endemic apathy, lack of motivation and lack of direction.

Motivate Cornish people to act together positively by showing strong leadership, great ambition and Cornwall Council leading by example.

This should include;

- a) Expecting a zero carbon standard of building (commercial & domestic (stop making things worse!)

- b) Enabling/ delivering a programme of decarbonisation of
 - a. Power
 - b. Heat
 - c. Transport
 - d. Food
 - e. Waste

2, Demand better of national government by

- a) requiring policy support,
- b) not accepting poor performance on their part &
- c) showing them it can be done

Is there a topic or theme not listed above that you think we should investigate and why is this so important to you? Commerce & Industry: - this area of building and activity tends to get less focus in Local Planning Policy, there should be high energy efficiency and building standards (Zero Carbon/ BREEAM excellent) for all new building Permitted Development Rights constraints:-

- a) enhance building standards or set embargos/ controls for highest impact PDR development that doesn't pass through planning system
 - b) Enable low carbon development, environmental improvement or renewable energy projects
- Minerals/ Resources Safeguarding – protection of resources required to adapt to climate change
Infrastructure planning: - provision of infrastructure to enable a transition to low carbon tech, particularly unlocking power grid constraints.

One particular policy is not important – the focus has to be to actually implement the policies when they are in place. For example, Section 4 of the DPD scoping document lists the existing planning policies in place. With the exception of policy 14s limitation of onshore wind deployment, if the existing policies were actually implemented & given proportional weight/ priority as others, you

wouldn't need to achieve much

more. Beyond that,

- a) Zero carbon building
- b) Enabling retrofit energy efficiency measures to existing buildings
- c) Enabling rapid renewable energy deployment
- d) Employ Natural climate solutions when adapting to change

What do you expect the impacts of new planning policy could have on your business, organisation or community?

Enable growth of clean energy sector companies with more inward investment, innovation & additional employment opportunities

Please focus on the tools you already have and start to use them whilst the Climate DPD is in development – every Local Plan & supporting Policy document has positive climate beneficial policy content - please use these and give them priority/ weight from today & not wait until the better tools are in place.

1.21 URN 376 PEP

Thank you for consulting on the Cornwall Climate Emergency Draft DPD. We recognise the hard work that has gone in so far, especially considering the difficult circumstances. Effective consultation relies on feedback, so we would like to set out our thoughts.

A forward looking DPD would create policies that promote the development in a manner that responds to the Climate Emergency and delivers Carbon Neutrality, or Net Zero. Cornwall Council

has stated with laudable ambition that this must happen by 2030.

It is not clear if the Planning Department of Cornwall Council has been fully briefed on the significance of what is needed to meet this target. To provide some scale, in the next nine years we have to develop, finance, and build between **10 and 20 times** more renewable energy capacity than has been installed in total over the past 20 years. This will create a Carbon Neutral Cornwall, which itself can only be an interim target. In time we must aim for a Carbon Negative Cornwall.

The Draft DPD may have Climate Emergency in its title, but it appears to have been written with pre- Climate Emergency thinking. “Fossil Fuels” appears just once in a document that should be all about planning to reduce dependency upon them. “Landscape” features 12 times, “Heritage” 13 times – the tone of the document is wrong. Cornwall must change its mindset if it is to seriously address the Climate Emergency.

Instead of writing fresh policies to promote the replacement of fossil fuels and the development of renewable energy it has, for example, contorted the wording of policies to fit with an outdated NPPF, in particular paragraph 154, footnote 49 (also known as the Written Ministerial Statement on wind development). Our particular concerns and suggestions are laid out below.

2 Two Tier Cornwall?

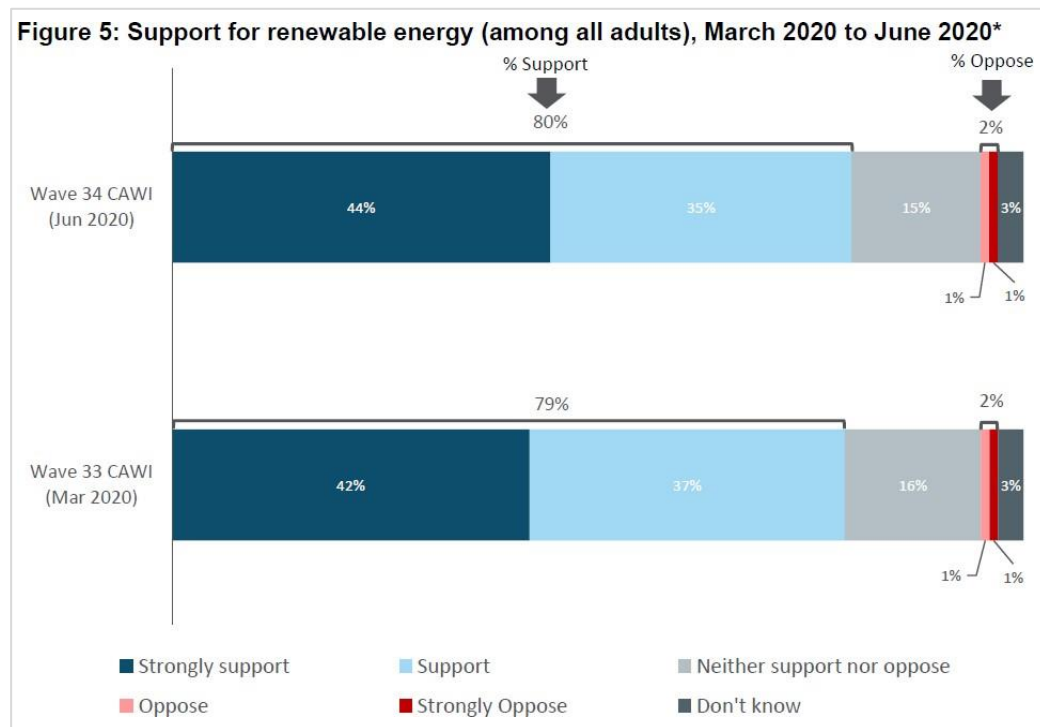
We have learned that a mapping exercise is underway to identify areas suitable for renewable (wind) energy development. This is solely for the purpose of complying with the outdated NPPF. The problems with this mapping exercise are many:

2.1 To achieve Net Zero, Cornwall needs to attract £15-£20 billion in new investment in green infrastructure improvements.

An unintended and probably unconsidered consequence of creating areas suitable for development will be the creation of a Two Tier Cornwall – those whose local geography accepts

clean energy, and the rest who will not have local clean energy. There will be those who will benefit from new infrastructure, and those who will not. There will be those who will benefit from new clean green jobs, and those who will not. There will be those who will benefit from the automatic access to local, clean energy, and those who will not. A small minority may claim that they have not been consulted and pre-emptive challenges to the idea of wind development close to some can be expected. The whole process could be unhealthy, damaging, and lead to further stagnation in terms of action against carbon emissions.

The majority, however, are clearly and consistently in favour of renewable energy. This is regularly demonstrated by the BEIS Public Attitudes Tracker – an extract of the latest is shown below:



2.2 Publication of a map of areas considered to be suitable for development will create a land grab. As there are very few developers left in Cornwall, wealthy developers from out of the county will be signing up landowners. Ultimately this will result in developer profit leaving the county, rather than staying within Cornwall, but in the interim their priorities may be different from the county's and this again may result in a slower pace of development than necessary.

2.3 It is not clear if the mapping exercise has considered grid constraints. How much of the land considered suitable by landscape consultants will have sufficient grid capacity to connect generation? As well as the land grab, there will be a 'grid grab' also. Even without the areas of search in place, there was a similar problem during the FIT boom some years ago. Errors of the past will be repeated.

2.4 To our knowledge, there has been no consultation with the renewable industry on the parameters of what makes a site suitable. We understand that the technical inputs misrepresent the type of low carbon equipment that the modern renewables industry now uses: this map was not raised

during the earlier consultation with industry players in Cornwall. The results will inevitably be flawed, will lead to opportunity sterilisation, and be potentially challengeable.

The absolute priority must be carbon reduction by replacing diesel, petrol, heating oil, coal, gas, aviation fuel and marine fuels with affordable low carbon energy from Cornwall's natural resources. Currently, over 10% of Cornwall's GDP is spent on polluting energy sources. Couple this with the fact that Cornwall and the Isles of Scilly have the highest level of fuel poverty in southern England, and it is clear that local resources need to be accessed by local people.

It is also clear that in the current planning policy, landscape and heritage impacts are being considered before the needs of the local people, the Cornish economy, and the Climate Emergency. This needs to change. In order to achieve the magnitude of development required to attain Net Zero, the overriding priority needs to be that of decarbonisation. Landscape must become a secondary consideration: There has to be profound change in order for Net Zero to be achieved. Although renewable energy developments have lifetimes of 25-30 years, they are only temporary, and so are their impacts on the landscape. If better solutions are found over the next 20 to 30 years, then all renewables can be removed and not replaced. The only absolute block to achieving Net Zero is the Planning system and its outdated reverence for landscape and cultural heritage. We need to change the way we consider these temporary impacts on the landscape – policy attitude needs to reflect this and weigh it up alongside the significant shorter-term benefit of de-carbonisation.

It is our opinion that the mapping exercise should be stopped. An alternative solution for the apparent need under the NPPF for identifying suitable areas would be to recognise the whole of Cornwall as being suitable for fossil fuel replacement. This should, of course, be subject to technical planning constraints and the usual public health and biodiversity considerations. Limiting areas that developers can look at is a negative step to achieving Net Zero. The DPD should encourage responsible development with decarbonisation as its priority. There should be no need for a two tier county – Cornwall One and All.

3 Land Use

There is a hierarchy of low carbon energy production from a given area of land. It is a steep hierarchy. Wind power produces five times more energy per year per acre/hectare than solar PV. In addition almost 100% of the land in a wind development can continue to be used for food production whereas it is sterilised by solar PV. Solar PV outperforms the next proven low carbon energy source of energy crops by a factor of 15 to 20. Meeting the demands of Net Zero could force renewable developments into competition for land that could otherwise be used for food production. For example, about meeting our energy needs from solar alone would require up to 80% of available arable farmland. Careful consideration needs to be given to how Cornwall uses its land resources and this needs to be done in conjunction with low carbon energy.

4 Setting Targets

As we need up to **20 times** the amount of today's installed capacity by 2030, interim targets along the way,

ideally annual, are needed and will enable progress to be monitored and priorities managed.

They must be based on sound assessment of the facts and what is genuinely needed and what is

realistically achievable. The targets should be set for those technologies that we know are technically and commercially feasible today.

For example, a five-fold increase in today's generation by 2025 is feasible if Planning policy is appropriate. A fifteen-fold increase by 2030 would allow Cornwall to support cities and regions less fortunate than us to decarbonise. It can also boost the green economy here.

5 Tests for Development of New Projects

Rather than applying negative-based tests that projects must meet before planning can be granted, it should be considered that ALL planning applications should have to answer the same question: "Does this development take Cornwall towards Net Zero, or further away from it?" If it takes Cornwall further away, then that needs to be measurable so it can be addressed and mitigated. In the case of renewable energy projects, they will inevitably move Cornwall towards Net Zero and should carry a presumption in favour.

We really appreciate the consultation on this important document which will be central to Cornwall achieving - or not - Net Zero by 2030.

As happened a few years ago during the early renewables boom, and if it has not occurred already, planners, council officers and Councillors should, perhaps, undergo training on planning in a Climate Emergency. We all need to fully understand what the problem is and what is required to tackle it. This could be led by the Carbon Neutral Cornwall Team as priorities have shifted dramatically ever since the Climate Emergency was announced.

PEP is keen to contribute to Cornwall Council's admirable Net Zero target and help drive it to a successful conclusion. The potential performance of different clean energy technologies is clear to us - this is what we do internationally and have done for 30 years. We have developed extensive information and reference materials on the energy transition and will be happy to share the key points with the Carbon Neutral Cornwall Team, and the Planning Team if desired. We have to work together as an industry and a Council to get this as right as it can be, as quickly as possible. The Net Zero challenge is huge, but achievable.