

Consultation: Climate Change Development Plan Document (DPD)

Scoping document (Regulation 18)

Representation Form

Consultation – 30th March to 5pm 26th May 2020

Representations can be submitted

by email to:

Climatechange.dpd@cornwall.gov.uk

By post to:

Climate Change DPD
Cornwall Council
3B, Pydar House,
Pydar Street
Truro
TR1 1XU

Introduction

The whole world is facing a climate emergency and we will all need to change the way we do things in order to address it. Cornwall Council has declared an ambition for Cornwall to work towards carbon neutrality by 2030. This is a massive task and will need a combined effort from the Council along with other agencies, businesses, residents and visitors to Cornwall to take this huge step.

To achieve our ambitions by 2030 will be extremely challenging and may well prove impossible; but that doesn't mean we should back away from the challenge. This is not the time to be passive or to wait for others. We are leading by example and will be calling on Westminster to provide the necessary powers and funding to help deliver our ambitions.

All services across the Council will have a part to play and planning is part of the solution. We will need to continue to house our residents, provide infrastructure and ensure that our children have a Cornwall in which they can continue to live and work. Planning Policies will have a major impact on the way that places grow and change and how we can protect and shape the Cornwall of the future.

Cornwall already has a Local Plan in place that includes a number of adopted policies that are aimed at addressing climate change. They alone are not enough and the Climate Change DPD will help us to be more ambitious, it will strengthen existing policies and create new ones and allocations that address the specific issues affecting Cornwall. This will be alongside other legislation being proposed that will

give additional powers to help protect our environment and to make sure that development is sustainable and relevant and that polices are enforced.

At this stage we have begun to gather the evidence from experts and stakeholders on a wide range of themes from building to natural climate solutions. This evidence has been used to identify the issues that we think we need to address and to create some policy options to do so. This scoping paper is your chance to comment on the issues and options that we have identified and tell us whether we have missed anything that should be included.

The Climate Change emergency affects everyone, and we need to work together to address it. It's very important that you to tell us what you think and to share your ideas for the future of a more sustainable and resilient Cornwall.

For more information, please visit www.cornwall.gov.uk/climatechangedpd or, alternatively, or email climatechange.dpd@cornwall.gov.uk

This form has two parts. Part A asks for your contact details and Part B asks questions for you to consider and gives you the opportunity to make comments.

Part A: Your personal details

You **must** complete Part A for your representations to be accepted. The Council can not accept anonymous representations.

By completing this form and submitting it to the Council you are giving your consent to the processing of personal data by Cornwall Council and that any information received by the Council, including personal data, may be put into the public domain, including on the Council's website.

1. Personal details.

Name	Calum Harvey-Scholes, Emily Judson
Organisation	Energy Policy Group – University of Exeter (Penryn)
Address line 1	G2.28 Stella Turk Building
Address line 2	Penryn Campus
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Address line 4	Cornwall
Postcode	TR10 9FE
Telephone number	
Email address	e.judson@exeter.ac.uk / ch673@exeter.ac.uk
Preferred contact method	Email

2. Agent details (if applicable).

Name	
Organisation	
Address line 1	
Address line 2	
Address line 3	
Address line 4	
Postcode	
Telephone number	
Email address	
Preferred contact method	Email <input type="checkbox"/> Post <input type="checkbox"/>

Q1 Do you wish to be notified of future stages in the Climate Change DPD including examination and adoption?

- Yes
 No

Part B: Your Representations

Our ambitions

Ambition: The Climate Change DPD will create new policies and allocations and strengthen those that already exist in the Local Plan. This will support Cornwall's aim to become Carbon Neutral by 2030.

To what extent do you support the Climate Change DPD ambitions?

- Agree strongly
 Agree somewhat
 Neither agree nor disagree
 Disagree somewhat
 Disagree strongly
 Don't know

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

1,

As a research group this submission focuses on providing feedback to questions in the planning document, rather than on impacts to the organisation/individual personnel. Please scroll down to the final question to find the bulk of our submission.

2,

What are the top two things we need to achieve first for Cornwall?

1,

2,

The following topic areas are being considered and we will be developing policies to support them:

- Energy Efficiency
- Renewable Energy
- Natural Climate Solutions
- Coastal Change and Flood Management
- Transport
- Agriculture and rural Issues
- Town Centre Densification

Is there a topic or theme not listed above that you think we should investigate and why is this so important to you?

N/A

Our ambition is to create planning policies that help Cornwall's aim to achieve carbon neutrality by 2030. What policies do you think would be most effective against climate change?

Policies prioritising the decarbonisation of all energy vectors – electricity, heat, transport and buildings. Cornwall has excellent renewable energy resources which hold potential to accelerate the transition to renewable energy. Heat, transport and buildings present harder challenges, particularly in a rural area. Prioritising these energy vectors, and providing clear policy direction on their decarbonisation, will be crucial for achieving the Net Zero target.

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

We are not able to comment on the impacts to the university as a whole, however we suggest that input may be sought (if it has not been submitted already) from the University's Climate Emergency team via climateemergency@exeter.ac.uk.

As a research group we would be interested in future opportunities for partnership and research connection as the strategy progresses. We would also be happy to discuss energy-related issues emerging throughout this process, if this may be of help during phases of policy development.

We would also be happy to offer input be willing to discuss energy related issues with them in order to help them improve their policies.

Do you have any other comments or any evidence for us to include?

Responses to questions in DPD Planning Document by thematic area are below.

Renewable Energy

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

We agree broadly that you have identified the key issues, including the restrictive nature of planning policy since 2015 and the reducing subsidy support. We have several suggestions that would strengthen the document.

Firstly, we would query the estimates provided for future electricity demand in Cornwall. The estimate for the required renewable electricity generation capacity stated (5 times current levels) is based on analysis of future electricity consumption. This analysis is important to ensure that future generation matches future supply. We would be interested to understand in more detail the analysis behind the projected growth in electricity demand due to “both increased general demand and the additional electrification of heat and transport.” We agree that electrifying heat and transport are positive solutions and that they will shift energy consumption from burning fossil fuels to consuming electricity. However, we are not aware of evidence for “increased general demand” apart from due to population growth – electricity consumption has been falling for over a decade in the UK¹. Cornwall Council’s projections for energy consumption in Cornwall to 2030, which account for changes in population, show a 9% reduction in total energy needed². This suggests to us that the estimated required renewable electricity generation capacity may be overestimated.

Secondly, we agree that onshore wind and solar are cheaper and more mature markets than offshore wind and deep geothermal and may be prioritised on that basis. However, we suggest that offshore wind is already viable and will be increasingly cheap over the next 10 years. Given Cornwall’s substantial coastal resources, this represents an area recommended for further exploration. We recommend that coordination with the DNO (Western Power Distribution) will be necessary in this process to ensure that there is adequate capacity on the networks, ensuring that these new sources of generation are able to reach intended load.

Thirdly, achieving carbon neutrality will require a ‘smart’ (digitalised) flexible range of distributed energy resources (DER) that exceed the current focus on generation

¹ <https://www.theccc.org.uk/wp-content/uploads/2017/06/Roadmap-for-flexibility-services-to-2030-Poyry-and-Imperial-College-London.pdf>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/820708/Chapter_5.pdf

² <https://www.cornwall.gov.uk/media/3640467/E1-b-Projected-Energy-Consumption-in-Cornwall-up-to-2030.pdf>

technologies. While energy storage is mentioned, we would welcome more depth on this matter. We would also encourage the Council to further consider how policy and planning processes relate to broader DER infrastructure/schemes, helping to build a flexible grid that is resilient to renewable generation intermittency. For example, this could include demand-response schemes or development of a smart electric vehicle (EV) charging infrastructure. This will require planning from a whole-systems perspective, so it is essential that strands of the plan do not become 'siloed'.

Finally, we strongly advocate that people should be at the heart of our energy system³. People must not be viewed merely as consumers, but as core stakeholders involved in making decisions⁴. One important aspect of this is putting people first in engagement and governance processes. The Centre for Sustainable Energy has produced expert guidance for community engagement and related it to energy infrastructure development⁵.

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

In the main, we agree with the direction of the policies outlined. However, we advocate for inclusion of two further points.

Firstly, communities should have a more central role in decision-making and engagement processes should be improved. This could be stipulated in local development policy. There could also be more support offered for community-led and community-owned projects.

Secondly, energy system digitalisation is nationally understood to be an essential enabler of a flexible and resilient decarbonised energy system^{6,7}. Engagement with digitalisation represents a notable omission in the current planning document (there is one mention of digital on p.28 relating to the potential of online shopping can reduce personal travel). The potential for digitalisation to support multi-sector decarbonisation should be considered in the Council's policy and planning development.

3) Is there anything else that should be included in this thematic area?

In constructing a digitalisation strategy to support Net Zero goals, the Council must also consider the development of Cornwall's digital skills and infrastructure. Connectivity across Cornwall (broadband and mobile data) is patchy and there are significant disparities in digital skills. Both of these factors could potentially act as

³ <http://projects.exeter.ac.uk/igov/presentation-putting-people-at-the-heart-of-the-energy-system/>

⁴ <http://projects.exeter.ac.uk/igov/working-paper-people-demand-and-governance-in-future-energy-systems/>

⁵ <https://www.cse.org.uk/local-energy/download/best-practice-in-community-engagement-projects-378> ; <https://www.cse.org.uk/projects/view/1315>

⁶ <https://es.catapult.org.uk/wp-content/uploads/2019/06/Catapult-Energy-Data-Taskforce-Report-A4-v4AW-Digital.pdf>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633442/upgrading-our-energy-system-july-2017.pdf

⁸ <https://www.energyrev.org.uk/>

barriers to technological development and adoption. We therefore recommend that the Council considers digital infrastructure and skills development in relation to Net Zero goals.

Energy Efficiency

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

We largely agree that you have highlighted the relevant issues here. We agree that insulating existing buildings is a priority and that regulatory incentives can be a useful tool to accelerate this. It is our view that quality energy efficiency retrofit and heat pumps will be crucial to decarbonising heat in buildings.

The document observes that “the opportunities for [heat pumps or low carbon heat networks] are likely to be limited in Cornwall.” We agree that opportunities for heat networks are limited to densely populated areas. We do not agree that opportunities for heat pumps are limited in Cornwall; there are a number of local characteristics (including many off-gas grid homes and relatively mild air temperatures) which favour heat pumps for a range of practical, economic and technical reasons.

Building new homes and non-residential buildings to a high standard of energy efficiency costs money upfront, though this is recouped over time through reduced energy costs. There are equity issues here: the lower living costs associated with more energy efficient homes can be inaccessible to those on lower incomes who are unable to afford more expensive properties. It is not sustainable to trade off affordability against carbon savings – policy must aim to address both.

We are concerned by the suggestion of using ‘carbon offsetting’ to ‘achieve zero carbon buildings’. Retrofitting is unavoidably more disruptive than insulating well during construction. Building new homes to a reduced standard and directing funds towards insulating existing homes appears to be of limited benefit: we find ourselves with well-insulated old homes and new homes in need of better insulation. We have more homes, but we still need to insulate many of them, and with added disruption once construction has finished.

5) Are the policy approaches that we’re suggesting about right – is there anything missing?

We are in agreement with the ambition of the proposed policy to go beyond building regulations. We do not understand the reason for slightly reduced ambition (19% reduction in carbon emissions) in Scenario 1, where greater powers are assumed, than in Scenario 2 (20% carbon emissions reduction). We would like to see greater ambition in Scenario 1 (stipulations about heating or electricity generation, for example).

6) 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?

No comment

7) Is there anything else that should be included in this thematic area?

No comment

Transport

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

We broadly agree with the content of the DPD document. As raised in response to the renewable energy section, we would encourage consideration of two further points.

Firstly, the development of EV charging infrastructure should be considered through a whole energy systems planning lens – connected with other DER infrastructure and flexibility schemes.

Secondly, digitalisation offers potential to support carbon reduction of private vehicle travel, as well as new solutions to help balance the electricity grid - for example smart charging or vehicle to grid (V2G) schemes.

The Council may wish to consider recommendations made in a recent report from the Energy Systems Catapult EV Taskforce⁹.

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

No comment

10) Is there anything else that should be included in this thematic area?

No comment

Thank you for taking the time to respond.

Please ensure your response reaches us by 5pm on Tuesday 26th May 2020.

By email to: climatechange.dpd@cornwall.gov.uk

By post to:

Climate Change DPD

Cornwall Council

3B, Pydar House,

⁹ <https://es.catapult.org.uk/reports/energising-our-electric-vehicle-transition/>

Pydar Street
Truro
TR1 1XU

Cornwall Council is committed to ensuring that our services, policies and practices are free from discrimination and prejudice and that they meet the needs of all the community.

If you are responding to this consultation as an individual, we would be grateful if you would answer the questions below. Thank you for your assistance. You are under no obligation to provide the information requested, but it would help us greatly if you do.

The information you provide will be treated in the strictest of confidence and will be processed in accordance with the requirements of the Data Protection Act 2018, will not be passed onto any third party, and will only be used for the purpose of equality monitoring. All personal information held by Cornwall Council is held safely in a secure environment.

Please tell us about yourself in the following questions.

What is your postcode: _____

Please give your age:

- | | |
|---------------------------------------|--------------------------------|
| <input type="checkbox"/> 19 and under | <input type="checkbox"/> 50-59 |
| <input type="checkbox"/> 20-29 | <input type="checkbox"/> 60-69 |
| <input type="checkbox"/> 30-39 | <input type="checkbox"/> 70+ |
| <input type="checkbox"/> 40-49 | |

How would you describe your sex?

- Male Female Other

How do you describe your ethnic origin? (Please read carefully before selecting the ethnic group that you feel most closely reflects your background).

- | | |
|---|---|
| <input type="checkbox"/> Asian or Asian British | <input type="checkbox"/> Mixed (e.g. White and Asian) |
| <input type="checkbox"/> Black or Black British | <input type="checkbox"/> Other, ethnic group |
| <input type="checkbox"/> Cornish | <input type="checkbox"/> White (e.g. British, Scottish) |

Do you consider yourself to be disabled?

- Yes No

Thank you! / Meur ras!