



Cornwall Council Climate Emergency DPD

Stakeholder feedback on renewable energy draft policies

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Front cover image: Goonhilly Wind Farm, 2006

1. Foreword from Cornwall Council

We would like to thank all the stakeholders who have commented on the DPD both in these sessions and during public consultation. Meaningful engagement throughout the DPD process is vital so along with this sector we are working with other specialists including AONB, Environment Agency, Natural England, Historic England and others.

Planning Policies can have a major impact on the way we produce energy going forward in ways that help to protect and shape the Cornwall of the future. The policies we are creating are helping us to work towards our aim of supplying 100% of Cornwall's energy demand from renewable and low carbon sources by 2030 whilst acknowledging the national target to be 'zero carbon ready' by 2050.

The feedback from the two sessions organised by Regen and from the continuous consultation we are undertaking whilst preparing the DPD has been invaluable. Using the evidence gathered, work on updating the draft Renewable Energy policies is underway and we will consider all of the suggestions made through consultation, but must recognise the balance between creating policies that are aspirational and challenging but that will be found to be sound at examination.

Further work

- We recognise the key role that storage will take in our aims for renewable energy and policies are being strengthened to reflect this. Guidance and additional information will be provided in the next iteration of the DPD. Discussions are taking place to provide clarification on what community and local ownership will mean in practice.
- Supporting information is being prepared to accompany all the policies in the DPD. It will include clarification around specific topics such as repowering of existing sites, community ownerships etc.
- A policy that positively supports the infrastructure required for offshore energy generation will be included in the DPD.
- Cornwall Council set a measurable target of 100% renewable electricity supply by 2030. This target was approved and published in 2017 and we will also track progress against the Climate Change Act target of Net zero by 2050. Additional targets may be set, and details will be made available when additional work on this has been completed. We will, as part of this consultation consider the approaches being taken by other authorities.
- We have commissioned work to map broad areas for allocations for renewable energy, this work was unfortunately delayed by the pandemic. It is now progressing well, and we will consult on the results later this year. We recognise network constraints and so we are working with Western Power Distribution (WPD) to provide further guidance. However, we do not consider that grid constraints should be a barrier as our intention is to provide certainty to assist WPD with forward planning.
- We intend to hold further consultations on the DPD and on the allocations mapping before submitting for examination. Please continue to let us have your comments and suggestions.

Cornwall Council, October 2020

2. Executive summary

In August 2020, following a first round of consultation, Cornwall Council produced a set of draft policies for its Climate Emergency Development Plan Document (DPD). The DPD is intended to set the framework for dealing with climate change through planning and help Cornwall achieve carbon neutrality by 2030.

On behalf of Cornwall Council, Regen carried out a second round of stakeholder engagement to gain feedback from industry and community stakeholders on the DPD's draft policies on renewables, and hear what else could be included to support the deployment of renewable energy. Regen organised an online webinar that brought together key industry experts, community energy representatives and other renewable energy stakeholders.

This report summarises feedback from stakeholders on renewables policies and views on what more the DPD should include to push Cornwall towards net zero. The main feedback on the draft DPD was that:

Policies should provide greater support for renewables in line with the level of ambition set out in the DPD's vision and purpose to help Cornwall work towards its 2030 target to generate the equivalent of 100% of electricity demand from local renewables.

Greater recognition is needed for the positive impact of renewables and the benefits clean energy will bring to Cornwall; currently, the DPD policies have a negative focus on adverse impacts.

Like all development projects, renewable generation projects potentially have both positive and negative impacts which need to be weighed through planning – given the aim of tackling the climate emergency and generating local renewable energy, the policies should make it clearer what level of adverse impacts (e.g. on landscape or heritage) can be accepted. To this end, Cornwall Council should continue to proactively engage with stakeholders and the wider public throughout the DPD process to understand community perspectives on what can or cannot be deemed acceptable.

The DPD should recognise the key role of storage in reaching net zero, e.g. by enabling more renewables to connect to the network, and support a broad set of storage technologies.

Community and local ownership should be at the heart of the DPD to capture more of the benefits of renewable energy locally in Cornwall. A requirement for all new proposals to have an element of local ownership can help achieve this.



Image: Wadebridge Renewable Energy Network Nanstallon Solar launch, 2015

3. Introduction

3.1 Project aim

In July 2019, Cornwall Council approved the first iteration of a Climate Change Action Plan to help address the climate emergency, the overriding challenge that faces Cornwall and the rest of the world in the years ahead. This included an action to create a DPD on climate change, which will set the framework for dealing with climate change through planning and help Cornwall achieve carbon neutrality. The Council commissioned Regen to undertake industry stakeholder engagement to inform the development of the DPD policies on renewable energy.

3.2 Methodology

In April 2020, Regen and Cornwall Council ran a first stakeholder engagement webinar to get views from key renewables industry and community stakeholders on what the climate emergency DPD should address regarding the need for renewable energy. Insight and feedback was summarised in a report by Regen to Cornwall Council as part of the consultation process, which was reviewed and informed the development of a set of draft policies for renewable energy.

Following the first round of consultation, Cornwall Council published its draft policies for the DPD in August 2020, welcoming views from stakeholders as part of the second round of consultation. Regen and the Council ran a second webinar for energy industry and community energy stakeholders in September 2020. All stakeholders who joined the first webinar were invited, along with new contacts from across the energy industry, those based in Cornwall, or those who had expressed interest in the DPD process. 21 stakeholders attended.

Robert Lacey, planning policy group leader at Cornwall Council, gave an overview of the DPD draft policies on renewables. The stakeholders were then split into breakout discussion groups. Participants gave their views on the draft policies and feedback on whether they will help increase deployment of renewables in Cornwall, to align with the Council's stated climate emergency ambitions of aiming for carbon neutrality by 2030. Regen would like to thank Dan Nicholls for his help in facilitating breakout discussions and providing feedback notes to capture stakeholder views. A full list of attendees and the webinar agenda can be found in the Appendix.

4. Stakeholder feedback

4.1 General feedback

Stakeholders participating in the webinar included representatives of renewable energy companies, community energy groups, planning experts and energy consultants. As such, stakeholders were aligned in their thinking about the need for Cornwall to deliver renewable energy in line with its net zero ambitions. Overall, there was a great deal of consensus on the points raised, with few conflicting views.

Level of ambition

Stakeholders were first asked to share their overall impressions of the DPD's draft policies on renewables, and whether they align with Cornwall Council's declared climate emergency ambitions. Feedback on this point was largely negative – with stakeholders disappointed that the draft policies did not match up to the area's ambition and the need to tackle the climate emergency. Stakeholders

felt that the feedback they gave at the first consultation session in April was not reflected in the draft renewables policies.

The majority of feedback on the level of ambition centered around the DPD not advancing policies that would encourage greater deployment of renewables compared to policies already in place, meaning they do not represent enough of a step forward or urgency in the planning regime to work towards Cornwall Council's aspiration to achieve 100% renewable electricity supply by 2030, alongside the UK target of net zero by 2050. Stakeholders said that there was too much focus on avoiding adverse impacts, and not enough recognition given to the positive impacts that renewables can have and the need for greater deployment in the light of the climate emergency. If anything, stakeholders felt that they make it harder for renewable energy than previous Cornwall policies due to a greater number of community consensus and biodiversity requirements, which were seen to set a higher bar for renewable proposals than non-renewable, leading to potentially perverse impacts of the DPD.

Stakeholders highlighted that aiming for net zero by 2030 will inevitably lead to some real and perceived negative effects on landscape and heritage sites, but this should be balanced by recognising the great need for and benefits of renewable energy generation in Cornwall and giving these aspects of developments greater positive weighting. Stakeholders felt that the policy should explicitly state that there would be negative impacts that, rather than being made acceptable, needed to be balanced against the area's net zero ambitions. Given that it is an emergency, stakeholders stated that further guidance for planning officers is needed to help them assess this balance and understand the benefits of renewable schemes that might weigh in their favour.

Overall, stakeholders felt that there needed to be a shift from thinking about renewable electricity technology impacts to a positive stance on how to decarbonise the whole energy system to achieve net zero. One stakeholder summarised the views put forward in the webinar by saying:

"With just 10 years to get to net zero, the focus of the DPD should be on (i) what does Cornwall need to realise that objective and (ii) what are the best set of compromises to enable that to happen. This means that the balance of weight affording to the benefits of renewable energy vs the potential negative impacts should be driven by the objective of the DPD."

Overall, stakeholders rated the draft DPD policies on renewables as 4.7 out of ten, on average, when asked, 'To what extent will these planning policies on renewables help Cornwall become carbon neutral by 2030? 1 (least) to 10 (most)'.

Targets

Stakeholders appeared unaware that the Council's climate emergency plan includes reference to the Council's target (agreed in 2017) to generate the equivalent of 100% of demand from renewable electricity by 2030 and this was not highlighted to them as Regen facilitators were not aware of this target.

Stakeholders identified that there needs to be clarity on plans to measure the DPD's progress against net zero regularly to 2030. They felt that there needs to be a clear, well publicised renewable energy target that is regularly tracked; this will enable progress to be measured and priorities to be re-set if sufficient progress is not being made.

Most stakeholders wanted to see the DPD set an ambitious target for installed renewable energy capacity to demonstrate the scale of the challenge and relay the urgency needed to get deployment going. Responding to concerns from officers about how to set an appropriate capacity-based target, stakeholders said that the Council should work with energy stakeholders and engage the local community in an honest conversation about what is needed, what this might mean in terms of scale required for installed capacity and its impacts and benefits.

In discussing potential targets, stakeholders stated that Cornwall should be looking to be ambitious in its renewable energy aims, given the available resources, and should not think in terms of Cornwall's energy needs, but as a net contributor to the UK's needs. This indicates that stakeholders felt the target for Cornwall's renewable generation should exceed Cornish demand, i.e. that a target to generate the equivalent of 100% of electricity demand from local renewable sources is not ambitious enough.

The Welsh Government has energy targets for percentage of consumption to come from renewable sources, amount of locally owned renewable generation capacity and projects to have an element of local ownership. Stakeholders said that this is a key example for Cornwall to explore when setting its own targets.

4.2 Renewable energy principles

Rebalancing of priorities

Stakeholder views on RE1 were similar to general feedback, particularly around the need for greater positive weighting for renewables and more consideration of storage. Feedback was that, with more than a ten-fold increase in renewable generation needed for Cornwall to achieve carbon neutrality, impacts on the landscape, land use and heritage will need to be accepted, with engagement and discussions needed at all levels to help people understand this and agree what level of impact is 'acceptable' in the context of a climate emergency. In addition, this could also be weighed against the potential negative impacts of unchecked climate change on the landscape.

Agriculture or on-site biodiversity use

While stakeholders were not altogether against a policy requiring the 'continuation of some form of agricultural or biodiversity use' through a requirement for Biodiversity Net Gain¹ there were concerns that this point may create an additional barrier for renewables getting through planning, and the impact of the policy will depend heavily on how biodiversity is allocated and measured. It was remarked that renewables are inherently good for the environment as they help reduce carbon emissions, so burdening them with additional environmental requirements seems peculiar if this requirement exceeds that put on other forms of development.

Storage policy and guidance

A key area identified as lacking in the DPD was specific guidance on storage. Feedback was that storage should be supported in principle as it can help build a flexible network necessary for integrating

¹ Biodiversity Net Gain was introduced in Cornwall as a validation requirement for all major development types in March 2020. The DPD currently proposes this 10% net gain as a policy for all major development. The Environment Bill proposes mandating of 10% net gain on all development in England (subject to some very limited exceptions that are not yet stated).

renewables and achieving net zero in Cornwall. Stakeholders felt the current single sentence on storage was insufficient and its important role means storage ought to form a separate policy with associated guidance.

While detailed guidance on different types of storage may be helpful to planners assessing applications and to developers when making applications, stakeholders stated that the headline storage policies should be supportive, but not technology prescriptive due to the pace of change in the area. Support for storage needs to be across the broadest possible range of technologies, including hydrogen, to ensure policies are appropriate for a variety of future energy scenarios. More detailed guidance on storage could be added to the Supplementary Planning Document (SPD) to give greater clarity to planners and developers.

Greater recognition of network issues

According to stakeholders, there needs to be greater recognition of, and guidance around, network constraints. Network conditions may inform locations of storage and renewable generation, so this needs to be accounted for in guidance and any mapping exercises to determine suitable locations.

There was concern amongst stakeholders that the sentence, 'Particular support will be given to renewable energy proposals which provide power direct to an end user (rather than export to the grid)', could be interpreted as meaning that there was less support for those projects supplying solely to the grid.

4.3 Safeguarding sites

For policy RE2, stakeholders mainly supported the principle of safeguarding strategic sites for renewables. However, stakeholders wanted more clarity over whether all areas identified as 'potentially suitable' for renewables are safeguarded, or whether it just applies to planned and existing sites. Feedback was also that wording needs to be more specific on point 1 regarding 'close proximity' to an installation. On point 3, stakeholders said that rather than simply supporting 'energy needs', all applications should be assessed in terms of their contribution to or compatibility with net zero.

Stakeholders pointed out that, as well as safeguarding potential sites of renewable energy generation, associated infrastructure needs to also be safeguarded. This is particularly relevant for network infrastructure, as grid challenges and planning challenges are 'fundamentally linked' and safeguarding sites with good grid capacity for low carbon technologies is vital for net zero.

4.4 Wind energy

Negative focus

Overall, stakeholders felt that policy RE3 focused exclusively on adverse impacts of wind energy, and as with the renewables policies as a whole, this needed to be balanced with recognition of the benefits of wind energy to Cornwall. As the cheapest form of renewable electricity generation in terms of levelized cost², large scale (over 5 MW) onshore wind will be key to achieving carbon neutrality, particularly given Cornwall's excellent wind resource.

² BEIS, [Electricity Generation Costs](#), November 2016

The Council should continue to engage with industry to explore how a policy with a more positive focus could be developed. There are examples from five other authorities that have identified allocations for wind; Rochdale, Lancaster, Chesterfield, Ashford and Harborough,³ which could help provide some context for potential policy changes.

Repowering

Stakeholders reported that the issue of repowering wind is not central to achieving net zero as there are limited wind farms in Cornwall which currently require and are suitable for repowering. However, guidance which recognises the actual area of a wind farm rather than just its 'site' would be helpful, to ensure sites can be repowered with turbines re-located most suitably

Size and scale

Stakeholders were keen to stress that, while wind of all scales should be encouraged through the DPD, larger scale turbines are more efficient in terms of cost and project time and effort per MW, so should make a greater contribution towards carbon neutrality in Cornwall. In general, turbine sizes have grown in the last ten years, with taller turbines now the norm to make subsidy free sites viable. When mapping the available resource and allocating sites, wind turbine parameters need to be consulted on with industry before policies on wind size and scale are set.

Area allocation

The issue of allocating areas received a mixed response from stakeholders. Some stakeholders felt that situating wind only in 'suitable areas' is overly restrictive, and mapping should be as broad as possible to ensure that optimum areas, with grid a key consideration, are accessible. Any allocation should be based on a top-down analysis of what is required to reach net zero, rather than focusing on factors which could be barriers to renewables being deployed. In particular, stakeholders were keen to see that opportunities for wind related to industrial sites and small scale domestic/commercial applications were not excluded through mapping.

4.5 Solar energy

Site allocation

Stakeholders fed back that the policies on solar energy installations did not differ significantly from previous policies. There was some concern that the wording in RE4 may exclude all greenfield sites, and stakeholders were keen that this should not be the case, as there can be agriculture or biodiversity gains on sites with solar PV. Conflicting points were raised regarding integrating solar and agricultural land for food production, suggesting the grade of land needs to be considered when assessing areas, with high grade land reserved for food production.

Most stakeholders warned against allocating solar sites, fearing it could lead to a 'gold rush' or land grab of suitable sites and drive up their price, while allocation may exclude more optimal sites. As with wind, any allocation should be based on a top-down analysis of what is required to reach net zero, rather than focusing on factors which could be barriers to renewables being deployed. Stakeholders said that policy should make it clear that impacts on heritage assets will be accepted proportionate to the importance of the site and balanced against the benefits of renewables.

³ Friends of the Earth, [Onshore wind: is its delivery being hampered by a lack of identified areas in Local Plans?](#), May 2019

Repowering

Policy supporting repowering solar farms was well received by stakeholders, as this is an issue being looked at by the industry; however, more guidance on this would be helpful. Feedback was also that community benefit should be added as a requirement when extending the life of solar farms, where this is not already the case, as this is key to capturing benefits of renewables locally from existing assets.

4.6 Geothermal

There was limited experience and expertise in geothermal issues amongst stakeholders on the webinar. It was raised, however, that policy on seismology needs to be proactive to ensure the industry does not get a bad name amongst the public or become associated with fracking. There was concern on the wording in RE5 on 'low carbon economy'; the DPD should use net zero or carbon neutrality consistently throughout, terms which have a different meaning to 'low carbon'.

4.7 Community-led proposals

Community ownership

There was broad consensus amongst stakeholders that community ownership or part-ownership of renewable energy should be supported as it will help keep more of the economic benefits within Cornwall during the next wave of renewables development. Community ownership should be a fundamental vision of the DPD, and this could even extend to a target for community and local ownership of renewable generation. Stakeholders noted that whether projects that meet the definition of community ownership will be given positive weighting in planning decisions needs to be made clearer. There was some concern that the point on community consensus creates a higher bar for community-led proposals than non-community proposals. Showing "consensus" was also deemed by some stakeholders to be problematic, as it implies that any anti-campaign could be used against a scheme to show a lack of consensus. Stakeholders felt that the council should consult experienced parties on definitions around community ownership as part of its further work to ensure pit falls are avoided. For example, Communities for Renewables has recently produced a definition that could be used.

Community benefit wording

A planning expert stakeholder identified potential issues with the use of the term 'community benefit' in the policy and notes. The stakeholder highlighted the Resilient Energy case, where the Supreme Court ruled that giving positive weighting for proposals on the basis of community benefit is illegal.⁴ Whilst stakeholders agreed community benefit should be sought from all energy schemes, care will need to be taken in developing a policy that meets this ruling.

Legal structures

For community-led proposals to be supported, the draft policies state that there needs to be administrative and financial structures in place. According to stakeholders, this should not prove too restrictive to community-led developments. Community support organisations exist in Cornwall who can administer funds to parish councils and local communities, with community energy templates and well-established structures in place for community benefits to be captured. Incentives through

⁴ The Supreme Court, [R \(on the application of Wright\) \(Respondent\) v Resilient Energy Severndale Ltd and Forest of Dean District Council \(Appellants\)](#), November 2019

planning should create opportunities for communities to invest in large-scale renewable schemes, by encouraging part ownership. Even 5% of shares going to a community share scheme would help to capture benefits locally within Cornwall.

5. Conclusion and recommendations

Overall, stakeholder feedback was that renewables policies contained in the draft DPD did not match the level of ambition set out in the DPD's vision and principles, and as such were not positive enough to help Cornwall deliver the renewable energy it needs to work towards becoming carbon neutral by 2030. Stakeholders expressed disappointment at the perceived negative focus of the DPD policies, where adverse impacts are often mentioned, without recognition of the positive impacts renewables can have and benefits of clean energy for Cornwall. The scale of the net zero challenge needs to be communicated through the DPD with an ambitious target for renewable energy generation, and engagement is needed with the public to garner understanding, acceptance and support of renewable energy deployment in Cornwall.

The views given by stakeholders closely ally with those of Regen. We would urge the Council to continue a close dialogue with industry as it redrafts the policies. Regen has also supplied the Council with our detailed feedback on the policies on a line by line basis using comments in word. We would also direct the Council to our interim report, which set out clear recommendations for approaching the DPD, starting with a net zero vision.

From this stakeholder feedback, Regen makes the following recommendations for renewables policies in the Climate Emergency DPD:

1. Renewables policies need a positive focus and to be more ambitious

If the proposed policies are to support the delivery of a net zero energy system, there needs to be a fundamental shift in their tone and focus. The urgency and importance of the climate emergency needs to be embedded across the policies, with policies written from the perspective of how to support what is needed to decarbonise the energy system. The policies only briefly mention issues around renewable heat, in relation to new developments. A more holistic approach is needed that focuses on the aim of whole system decarbonisation, rather than renewable electricity generation, with clearer links to sustainable construction policies.

In relation to the specific policies, there needs to be a recognition that some negative and perceived negative impacts will be necessarily felt and guidance is needed for planners and applicants on how these should be weighed against the positive benefits and the needs of the emergency. More explicit recognition of the potential benefits and how to maximise these is needed.

Further consultation with planning experts, renewable experts and the wider Cornish community is needed to establish what is possible under planning law and how far the Council is able and willing to go in using policies to support renewable deployment. Our interim report sets out an approach to agreeing a vision that should be the basis on which more radical planning policies can be built.

2. Engagement should continue with stakeholders and the wider public on what carbon neutral Cornwall will look like

Aspects of the DPD, particularly mapping areas for wind allocation, are likely to stir up controversy in the community, particularly from anti-renewable campaigns. The Council should look to tackle these issues head-on, by being clear on the scale of the net zero challenge, the benefits of renewables installation, having honest conversations, and continue engaging early with the public to communicate why DPD policies are necessary and how balances need to be struck between issues such as landscape protection and installation of renewables. These conversations should be used to agree what

compromises the community is willing to make in relation to delivering against climate emergency ambitions – working through issues around the definition of acceptable impacts for instance. A citizens' assembly might be one route to discussing and agreeing the “best set of compromises” or the hard choices that need to be made. We recognise that there is a need, given the climate emergency, to develop supportive policy as soon as possible; however, working with the community to build social permission for change is a vital step to enabling the development of more impactful policies, and should not be missed.

3. Targets to demonstrate ambition

Targets are vital for measuring the DPD's progress and communicating the size of the net zero challenge. The target for “100% of Cornwall's electricity demand to come from zero carbon means” needs to be discussed, clarified, potentially increased and communicated. Regen and stakeholders were unaware of this target during webinar discussions, in particular as it does not feature in the draft DPD.

The Council should work with industry and the wider community to discuss and set an appropriate target for installed renewable energy. In particular, Regen suggests the council considers the following points as it further develops its renewable energy target/s. We understand that the Council is due to commission further studies that may include understanding energy mix scenarios and that the Council is planning further consultation with the public on these issues.

- The target as currently worded covers only electricity demand. To achieve net zero, the target should cover all demand including transport, heating and industrial processes.
- The target's current wording is not totally clear as it does not specify if it refers to local zero carbon generation or not.
- The target should use the wording “the equivalent of xx% of Cornwall's electricity demand is met by (local) renewable generation”. The wording “the equivalent of” is important as it allows for import and export of electricity, rather than an islanded approach. We understand that the Council in measuring progress against the current target uses this “equivalent of” methodology, and suggest this is made clear to all stakeholders by altering the wording of the target in all communications.
- Cornwall can and arguably should be a net exporter of renewable electricity – it has a greater proportion of resources and lower demand than urban areas, so can be a net contributor to the UK's decarbonisation. The Council should consult with the public on the potential to go beyond a 100% equivalent target.
- It is useful to understand how a target that relates to a percentage of consumption translates to renewable capacity – this helps to frame the issue in a more tangible way. The Council should develop scenarios for delivering the target and engage with the public on the impacts and benefits of different scenarios.
- The target should be included in the DPD to ensure it is widely communicated and can be used to balance decisions in favour of renewables projects. For example, the [Bath & North East Somerset Council Core Strategy](#) included a capacity target for renewable electricity and heat (Policy CP3), which is regularly reviewed.

4. Community ownership should be at the heart of the DPD and policies should incentivise and support community-led proposals and part ownership

Cornwall Council should require all new energy proposals and solar and wind repowers to have at least 5% community ownership. This will help keep more of the benefits of the next wave of renewable energy deployment in Cornwall. Wording on 'community consensus' needs to be clearer and ensure that this does not create a barrier to community-led proposals. The council should engage with planning experts to understand the issues around community benefit and to develop policy that is as supportive as possible for schemes that maximise local positive impacts.

5. Work with industry to develop further supportive policy on storage

Stakeholders identified specific guidance on storage as lacking in the DPD. The Council should continue to work with industry representatives to develop more detailed policy on storage, with the broadest possible set of technologies, including hydrogen, to be included. Policies should be supportive of storage which can export to the grid. The role of storage in achieving net zero by enabling more renewables to connect to the network needs to be recognised.

6. Appendix

6.1 Breakout room facilitation notes

General feedback

Do these policies align with Cornwall Council's climate emergency ambitions?

- Policies appear to be designed for an old, relaxed paradigm – not suitable for a climate emergency/net zero.
- No – other than wind, not much different to current policies.
- Need to rebalance the benefits attributed to renewables – adverse impacts still the same as before.
- Need to give more weight/consideration to benefits of and need for renewables vs. landscape or heritage concerns.
- No need to relinquish adverse impacts, but balance them from the positives of renewables.
- Getting to net zero will require some impacts – needs to be a greater understanding of what you're gaining despite impacts.
- There may be adverse impacts to heritage sites, but need to recognise how much this is needed.
- Additional requirements to make it difficult for renewables – more barriers.
- Policies make little positive difference for solar.
- 'Zero ambition' to increase the amount of renewables.
- The policies repeat those in the NPPF – they don't make the leap to achieving carbon neutrality by 2030. If anything they make it harder for renewable energy with more upfront tasks.
- Where's the progress from the previous policies?
- No sense of what the plan will deliver – a lot of words but no sense of how it will achieve 2030. Generally too much text, with additional hoops to jump through. It needs to be simpler and sharper.
- Overall – it needs fresh eyes. It feels like it was written a long time ago rather than being the latest thinking. It seems heavily focussed on electricity generation rather than decarbonisation of the energy system.
- Written backward looking – think decarbonisation of energy, not electricity.
- Opening sections positive. RE principles don't add to the LP – possibly even make development more difficult.
- With just 10 years to get to net zero the focus of the DPD should be on (i) what does Cornwall need to realise that objective and (ii) what are the best set of compromises to enable that to happen. This means that the balance of weight afforded to the benefits of renewable energy vs the potential negative impacts is driven by the objective of the DPD.
- A citizens' assembly could help to define the right balance or compromise that will help the DPD achieve net zero by 2030.
- The DPD should seek to maximise the social & economic benefit of the transition to net zero for Cornwall's communities. This means that community energy should be embedded in the vision, rather than an ancillary consideration, as currently drafted. Specific comments on community ownership below.

What more can the Council do to support you?

- Provide more guidance.

- Refocus balance.
- Significant positive weight to renewables.
- Additionality to be gained from built environment policies – should be more ambitious, drop ‘where feasible’ and require on-site generation to create demand and help build business case for renewables in Cornwall.

What is missing

- More on the perceived benefits of renewables.
- Timeframe on offsetting.
- Plans to measure the DPD against progress towards net zero by 2030.
- More specific guidance on storage – should be supported in principle as it can help build flexible grid necessary in Cornwall – ought to form a separate set of policies.
- Need to be able to export to grid with storage.
- Hydrogen – lots of potential – need clear policy support in principle, especially as locations may be rural.
- Policy should be as supportive as possible for broadest set of storage technologies.
- Need to be more appreciative of ‘emergency’ and include guidance to help planning officers push decisions through.

What additional guidance would be helpful?

- Grid constraints.
- ‘suitability of location for processes’ – need to appreciate some storage may need to be in rural locations – potential conflict with local plan.
- Storage – need reference to grid and generation location to make it more helpful – help to explain why storage is needed where.

Would a specific target for renewables be helpful to you?

- Best way is to set some “alarming” targets and have a discussion about the size of the challenge – frame the scale of the challenge. Sooner or later there will be public outcry – better to have the discussion about priorities earlier rather than later.
- In thinking about renewable targets - net zero for Cornwall is selfish, the area needs to be contributing to the national picture.
- Outrageous targets for renewables are needed to get it moving – otherwise it will get to 2028 and we won’t have made any progress.

What do other authorities do that we should consider?

- Bristol has a hierarchy for new sustainable development linked to heat. Homes need to be net zero.
- Wales (the Welsh gov?) is developing/has developed a target for local ownership. Defines it in broad terms. Not perfect, but worth a look.

Renewable energy principles

How to rebalance in favour of renewables?

- What does made acceptable mean? Science demands we move fast – what we deem acceptable needs to change .
- Urgency and survival – precious landscapes need to change. How we define acceptable in the context of climate emergency. Extra charge forward needs to go into policy and

principles. Discussions on landscape and emergency need to be held at all levels, including with Nimby types in parish council.

- What is it really saying, adverse impacts – where is this being set – needs to be clearer on what is acceptable? E.g. heritage settings
- Needs to increase renewable energy by a factor of 10, need onshore wind and solar, wind a more effective use of land – the guiding principle needs to say the landscape will be affected.
- Targets and acceptability – engagement with the wider community is needed. Need to move forwards from acceptable – to acceptable within the context of meeting the target.
- Thought needs to be given to different scales of renewables in target setting and area allocations.
- Resource assessment is vital to the process. Applying different buffers will have a very different impact. Needs to be evidence based.
- Principles need to be on decarbonisation of energy rather than on renewable electricity. Needs to consider heat.
- Land use should not be considered as a separate theme – energy per hectare needs considered. On that basis wind is far more productive than solar.

Does biodiversity/ agriculture point work for all tech?

- Seems like we're making it more difficult for renewables to get through planning.
- Renewables are inherently positive for the environment, so why is this extra requirement needed when it's not there for other kinds of development?
- Depends on how biodiversity is allocated and measured.
- May be a barrier for developers.
- Supported wherever possible. The industry should embrace this.

Storage policy – does this need to be more specific? Is this helpful?

- Current wording on storage only considers electricity storage.
- Long-term energy storage needs considered - hydrogen for example or even wood.
- Some respondents felt that the policy needs to be less prescriptive for storage due to the pace of change .
- Policy needs to be meaningful – as currently doesn't add anything.
- Aim should be to get rid of fossil fuels – with storage as one option.
- Clarity of policy is helpful, but some of the statements within RE1 does not prioritise the climate emergency (the wrongly focus on negative impacts and mitigation, rather than delivering net zero).
- Community led proposals – community consensus would block development.
- Community ownership needs to be defined by the community benefits, rather than the consensus or level of support.
- The council should consult experienced parties on the definition as part of its further work to ensure pit falls are avoided. CfR have recently produced a definition that could be used.
- Storage policy - should also support hydrogen and mechanisms to transfer renewables across vectors into transport.
- Storage policy - should also recognise the critical role that storage plays in enabling the grid to accommodate more renewables. The policy needs to recognise this.

Safeguarding sites

Does the policy as worded work to safeguard the resource as well as planned sites?

- Principle supported – but why restrict to identified areas? – Look at LC15 from previous labour government..
- Also need to protect associated infrastructure.
- Wording needs to be clearer on areas and sites, existing and planned
 - Too broad
 - It could be stronger – for all sites, not just allocated areas

Is it strong enough to prevent high carbon peaking plant developers taking advantage of point 3?

- Safeguarding of sites with good grid capacity for zero technologies is important.
- The ability to assess applications for their contribution towards net zero and monitoring progress of the DPD is important (refusing those that have a negative impact on the pathway to net zero).
- Grid challenges and planning challenges are fundamentally linked. Is grid capacity part of the LUC landscape capacity appraisal?

Wind energy

More specific on repowers?

- Need repowering guidance which recognises the area of a wind farm, rather than specific 'site'.
- Issue of repowers is relatively minor compared to the need for new wind – potentially only 2 sites in Cornwall which could be repowered.

Would more supportive phrasing help?

- All forms of wind should be encouraged – but larger scale more efficient – same amount of work to develop as small wind turbines.

Any views on the right approach to allocating areas?

- Areas – engagement is needed on the parameters. It makes a big difference as to what parameters are used.
- For example, 2 and 2.5 MW turbines are obsolete, with turbines either larger or smaller. Industry input on the parameters is vital .
- Mixed scale approach is needed – E.g. opportunities that are on industrial sites, or domestic scale .
- Take the North Devon approach of mapping small scale opportunities everywhere – this is compatible with the NPPF.
- Largely unhelpful – why not say all of Cornwall?
- Not in favour of designated areas – need to be as broad as possible so development occurs in the best possible areas.
- Areas with grid capacity are important.
- The DPD needs to challenge the NPPF where the Framework creates barriers to achieving net zero by 2030. In particular, the text which enshrines the June 2015 ministerial statement on onshore wind is out of date and too constraining. This should be challenged by the DPD or the Council.

Solar energy

Does this wording prohibit greenfield sites?

- Wording not particularly different to what we had previously.

Would allocating solar sites be helpful

- No – could lead to ‘gold rush’/land grab of allocated sites and drive up their price.
- Should be opt out rather than opt in.
- Grade of land needs to be baked in. PV sterilises land for food production – need recognition of this conflict.
- Cornwall previously had good guidelines on acceptable land for solar PV – land use planning is needed.
- Need to have some awareness of landscape in the layout of the site – example of site next to the A road that has jagged edges showing, site design is important.
- Heritage – policy needs to make it clear that impacts can be accepted and level of impacts proportionate to the importance of the heritage site.
- As with wind and other technologies, allocation is not a bad thing if the sites are viable. However, this should be based on a top down analysis of what is required to achieve net zero and reflect the best set of compromises that can achieve that goal, rather than focusing on the locations/factors that present renewables from being deployed.
- The upcoming LUC study should recognise the learning from the last 10 years of solar in Cornwall to ensure it takes account of the reality/benign nature of the development.
- Extensions to existing sites are being looked at by the industry – policy should consider a positive position on this (including whether permission is being seen temporary or permanent).
- The DPD should support development that maximises the energy yield from land/collocates different technologies (e.g. wind and solar on the same site).
- Don’t exclude greenfield land where there can be net agricultural and biodiversity gains associated with deploying solar in a way that integrates with agriculture, rather than sterilises agricultural land.

Additional solar feedback

- Need more guidance/detail on solar repowering.
- Community benefit should be added as a requirement when extending the life of solar farms where not already the case – key to capturing benefits of renewables locally from existing assets.

Geothermal

Seismology

- Worth considering a proactive policy on seismology to ensure the industry does not get a bad name/associated with fracking.

Wording on low carbon economy

- DPD should use net zero or carbon neutral consistently throughout.

Community-led proposals

How to make this wording more supportive?

- Resilient energy – supreme court decision on community benefit as a material consideration – says you cannot consider community benefit in determining an application – based on this believe this clause on community benefit to be unlawful.
- The DPD should include a target for community ownership or a minimum community ownership target for individual development proposals.
- If a project meets the definition of community ownership this should carry positive weight in planning decisions. This needs to be clarified.
- Also find some way to prioritise community ownership in the DPD's strategic sites.
- (As above) Community ownership should be embedded in the fundamental vision of the DPD.

Is community consensus problematic?

- Not for existing assets.
- Community led proposals – community consensus would block development.
- Community ownership needs to be defined by the community benefits, rather than the consensus or level of support.

Is point 4 on legal structures restrictive – better to make this a condition that they will be put in place than require them prior to planning permission?

- Organisations exist, such as WREN, Cornwall Foundation, who can administer funds to parish councils/local communities – templates well established a structures there, also plenty of information from organisations like Community Energy England.
- Opportunity for communities to invest, especially in larger schemes – even if just 5% to community share scheme.
- There appears to be a higher bar set for community led than non-community proposals.

6.2 Webinar attendees

First Name	Last Name	Organization
Charmian	Larke	Atlantic Energy
Dan	Nicholls	Centrica
Robin	Johnson	Clean Earth Energy
Amber	Trenberth	Clean Earth Energy
Jake	Burnyeat	Communities for Renewables CIC
Ben	Simpson	Cornwall Council
Gareth	Davies	Cornwall Council
Peter	Lefort	Cornwall Council
Neil	Butler	Cornwall Council
Neil	Hayhurst	Cornwall Council
Rob	Lacey	Cornwall Council
Jaquie	Stenson	Cornwall Council
Peter	Ellis	Freelance town planner
Steve	Edney	futurfarm ltd
Peter	Larwood	Imerys Minerals Ltd
Andrew	Williams	Lanhydrock Estate Company
Nicola	Jones	Lightsource bp
Lauren	McGill	Low Carbon
Neil	Harris	nth Power
James	Davison	PEP
David	Parish	Planet A Solutions CIC
Claudia	Dietz	PS Renewables
Bruce	Woodman	Pure Energy Professionals
Daniel	Letch	Pure Energy Professionals
Ky	Hoare	Regen
Hazel	Williams	Regen
Rachel	Hayes	Regen
Sonya	Bedford	Stephens Scown
Christine	Coonick	Wadebridge Renewable Energy Network (WREN)
Simon	Allen	Wardell Armstrong
Walter	Wonnacott	WMW Consultants Ltd

6.3 Webinar Agenda

- 10.00 **Welcome and introduction**
Hazel Williams, Head of Delivery, Regen
- 10.10 **Overview of DPD draft policies**
Robert Lacey, Planning Policy Group Leader, Cornwall Council
- 10.30 **Roundtable discussion on draft policy areas – breakout**
1. Renewable energy principles
 2. Safeguarding strategic sites
 3. Wind
 4. Solar
 5. Geothermal/mine water
 6. Community led proposals
- 11.30 **Feedback on discussion**
- 11.40 **Planning reforms – impact on renewables**
- 11.50 **Workshop feedback and closing remarks**
Hazel Williams, Head of Delivery, Regen
- 12.00 **Close**