

## **Consultation: Climate Emergency Development Plan Document (DPD)**

**Pre-Submission document (Regulation 18)**

**Representation Form**

**Consultation – 10<sup>th</sup> August to 5pm 25<sup>th</sup> September 2020**

Representations can be submitted

by email to:

[Climateemergencydpd@cornwall.gov.uk](mailto:Climateemergencydpd@cornwall.gov.uk)

By post to:

Climate Emergency DPD  
Cornwall Council – Planning,  
PO Box 676,  
Threemilestone,  
Truro TR1 9EQ

### ***Introduction***

The Cornwall Climate Emergency DPD is part of Cornwall Council's response to the climate emergency and the need for renewal post Covid-19. Our response and growth needs green, resilient and innovative ways to economic recovery.

The Climate Emergency DPD is a key action of Cornwall's Climate Change Action Plan, which sets out a programme of actions required to respond to the Climate Emergency and to create a carbon neutral Cornwall in 2030, a full 20 years before the UK commitment.

For more information, please visit [www.cornwall.gov.uk/climatechangedpd](http://www.cornwall.gov.uk/climatechangedpd) or, alternatively, or email [climateemergencydpd@cornwall.gov.uk](mailto:climateemergencydpd@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.

### ***Fair Processing Notice***

The feedback provided will enable Cornwall Council to finalise the draft document and will be retained for the life of the plan. Full names and comments provided will be published online and in hard copy.

## 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 the Representation Form and submitting it to the Council you are giving your consent to the processing of your personal data by Cornwall Council and that any information received by the Council, including personal data (but excluding personal contact details and any signatures), may be put into the public domain, including on the Council's website. Publication will not include any information which you provide on the accompanying Equality Monitoring Form which will be retained for up to three months from the close of the consultation

### 1. Personal details.

<b>Name</b>	Tony Faragher
<b>Organisation</b>	Wadebridge Renewable Energy Network (WREN)
<b>Address line 1</b>	c/o Alexander and Co
<b>Address line 2</b>	Negys Gorthybow
<b>Address line 3</b>	Schooners Business Park
<b>Address line 4</b>	Bess Park Road, Wadebridge
<b>Postcode</b>	PL27 6HB
<b>Telephone number</b>	07858 489254
<b>Email address</b>	Tony.faragher@wren.uk.com
<b>Preferred contact method</b>	Email <input type="checkbox"/>

### 2. Agent details (if applicable).

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

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

Yes

**Q2 If called upon are you willing to participate in the examination of the DPD?**Yes **Part B: Your Representations**

We are asking for your response to the proposed Planning Policies for the Climate Emergency DPD. For ease these are set out below, along with a series of specific consultation questions.

Dear Climate Emergency Team,

WREN, the Wadebridge Renewable Energy Network, hereby present our response to the Cornwall Council Public Consultation on the Climate Emergency Development Plan Document (DPD). Please see attached, with our responses in red. WREN promotes the environmental and energy concerns of the Wadebridge & Padstow Community Network Area & Parishes.

While we have not responded to every policy point, our responses are the result of diligent examination and discussion, both within WREN and in collaboration with other community energy groups across the county.

We would like to commend Cornwall Council on its commitment to net-zero by 2030 and for its sincere resolution to combat climate change. It is very encouraging to see that the Climate Emergency is at the forefront of policy, including the Council's planning strategy.

Our overall reaction to the Climate Emergency DPD is that it represents all the right aspirations, but lacks ambition and detail in some of the key measures proposed to achieve them. We have identified these in our response form, in the areas of Climate Change Principles, Sustainable Transport, Renewables, and Energy and Sustainable Construction.

In addition to our responses to the DPD policies, we would also like to see:

- A demonstration of the proposed planning policies' consistency with Government Acts and relevant guidance, ensuring that planning policy clearly and comprehensively deals with climate change mitigation and adaptation. (For example, with respect to the Climate Change Act 2008 as amended 2019, the Planning and Energy Act 2008, the Planning Act 2008 etc.)
- A quantified carbon reduction target for Cornwall both up to 2030 and for the period 2030 to 2050, and a quantified demonstration of how the proposed planning policies fit within this.
- An agreed pathway to achieve this target, with milestones, dates and a demonstration of how the proposed planning policies support this

pathway.

- A plan to periodically monitor outcomes of the proposed planning policies against this pathway, for both the period to 2030 and beyond 2030 to 2050, with details of a strategy should the interim targets not be met.

We hope that our response offers a useful contribution to the discussion. We are keen that this Development Plan Document will put Cornwall on the right trajectory for the future. We also hope that Cornwall Council and WREN will engage further on climate change matters in the future. We would like to offer our ongoing support and input, going forward, to any matters relating to the Climate Emergency.

Please do not hesitate to get in touch if you have any comments or queries about our response.

Many thanks,

Tony Faragher  
Chair, WREN

### *Proposed Policy Climate Change Principles*

#### **Policy C1 – Climate Change Principles**

Development in Cornwall must represent sustainable development and manage our natural and cultural assets wisely for future generations. Proposals must contribute to and achieve the following objectives:

1. Be low carbon and make the fullest contribution to minimising greenhouse gas emissions in accordance with the following energy hierarchy:
  - a. Be lean: use less energy
  - b. Be clean: supply energy efficiently
  - c. Be green: use renewable energy
2. Mitigate against and improve resilience to the effects of climate change;
3. Contribute positively to the health, wellbeing and resilience of our communities;
4. Contribute positively to environmental growth, protecting and increasing the ability of natural systems and nature recovery networks and ensuring a net gain for biodiversity;
5. Ensure resource efficiency, minimisation of waste, reduction in embodied carbon and conditions that create opportunities for a circular economy;
6. Maximise the ability to make trips by sustainable and active modes of transport in all developments through careful design and mix of uses that support walking and cycling rather than car use for day to day living;

7. Use and reuse land efficiently through the delivery of appropriate higher densities of development on the most accessible sites (including town centres and public transport hubs such as stations);
8. Conserve the capacity for sustainable production of food, water, raw materials and energy and minimise the impact upon the quality, stability, and function of soil;
9. Conserve and enhance our natural and historic environment and cultural heritage and increase built and natural environment distinctiveness through locally distinctive, high quality and sustainable design and multi-functional green infrastructure provision;
10. Minimise or avoid light, water, air and noise pollution and improve or maintain air quality;
11. Protect and enhance carbon storage in our natural environment (including the marine environment); and
12. Improve or maintain the natural functioning of coastal and river processes, avoiding areas at risk of flooding and coastal change and further reducing flood risk elsewhere wherever possible.

### *Pre-submission Consultation Questions*

1. Does Policy C1 pick up the right issues and principles – is there anything you would add? **A couple of the principles could be expressed more strongly e.g. 1c ‘increase the production and use of renewable energy’ and 8 ‘increase the capacity for sustainable production of food ....’**
2. Is there anything else that should be included in this policy?  
**‘support the people of Cornwall to understand more fully the realities, timescale and consequences of climate change and biodiversity loss, and engage them proactively in mitigation and adaptation activities’**
3. Do you have an alternative approach to C1 that you think the council should consider?
4. Any further comment?

### *Proposed Policies Natural Climate Solutions*

#### **Policy G1 – Green Infrastructure Design and Maintenance**

Green infrastructure should be central to the design of schemes, ensuring permeability of the site for wildlife and people and creating a multi-functional network of spaces and uses rather than being a series of disparate spaces or uses. Major development proposals will be expected to meet the following principles of green infrastructure design:

1. The green infrastructure forms a multifunctional network through the creation of linear and other green infrastructure features to provide and enhance natural connections;

2. Identifies important local character features, including existing planting, trees, groups of trees, copses, wetland and hedgerows as the key starting point for green infrastructure proposals and retains, reinforces and embeds them into the design of the development to create distinctive places that reference, reflect and enhance the local environment;
3. The green infrastructure is accessible for all and promotes health, wellbeing, community and cohesion and active living;
4. The green infrastructure incorporates sustainable drainage and creates better places for people and wildlife;
5. The development creates networks of habitat within the site and links effectively to networks beyond the site. Where development is adjacent to or within Local Nature Recovery Network Areas (Policy G3) the proposal must include clear and functional links to these areas;
6. The green infrastructure is resilient to climate change, minimises the development's environmental impact and enhances the quality of water, soil and air, aiding resilience and adaptation to climate change;
7. For grass habitats such as verges and amenity grassland, planting should consist of at least 50% insect pollinated plants with a minimum of 10 species and predominantly native species;
8. Street trees and other greening are integrated into street design and public open spaces wherever possible. In order to create environments suitable for street trees any streets should be designed to be wide for the creation of tree pits, whilst maintaining the space for the necessary runs of services (e.g. water, electric, sewerage);
9. Landscape bed planting, including ornamental beds, should comprise of at least 50% insect pollinated plants of a varied species mix and including predominantly native species;
10. Homes should have access to a well-proportioned and well-orientated garden to the rear of the property that provides for a range of activities (at least equal in size to the footprint of the house). For flats, this may be communal space, but ideally should also include a balcony or patio space. Triangular shaped gardens, excessive shading or steeply sloping gardens should be avoided wherever possible;
11. The development shall make provision for long-term post development management and maintenance for all green infrastructure, including provision for community representation and management.

The Council encourages all development to be designed in line with the free-to-access Building with Nature Standard and achieve accreditation where possible.

### **Policy G2 - Environmental Net Gain**

Development proposals should deliver gains for the environment and biodiversity. Development should not result in any net loss of canopy on site by means of the retention of existing canopy (including trees and hedges) and the planting of new canopy in the form of trees and hedges as reinforcement of existing hedges and woodland, street trees and other planting.

All major development proposals shall provide at least a 10% measurable biodiversity net gain over the pre-existing score for the site using the latest DEFRA

metric or any subsequent metric. All minor development proposals will deliver gains for the environment using the Green Points system.

1. Minor development (creating new floorspace of more than 20 square metres gross, excluding change of use not creating new dwellings) shall contribute to a measurable increase of biodiversity in Cornwall through the provision of biodiversity features using the Cornwall Green Points system.
2. All major development types, including highways and infrastructure projects which may not need planning permission, in Cornwall must achieve a minimum of 10% Biodiversity Net Gain (or any higher percentage mandated by national policy/legislation) over the baseline site score as measured by the latest version of the DEFRA Biodiversity Metric or any subsequent on the application site.
3. All major development types should result in no net loss from all the habitat types which create canopy cover e.g. the woodland habitat types, hedgerows, street trees, orchards etc (evidenced through the net gain metric), and should provide through the retention of existing and/or the establishment of new, canopy coverage equal to at least 15 % of the site area (excluding priority habitat types) which shall be counted against the 10% requirement for Biodiversity Net Gain.
4. Where a proposal has followed the mitigation hierarchy, but demonstrates that the required net gain cannot be achieved onsite within the site boundary, it must provide for the offsetting of any habitat types to be lost alongside the percentage gain required either through:
  - i. the purchase of biodiversity offsetting units to enable provision to be made by an approved biodiversity offset provider; or
  - ii. direct provision of the habitat types in a suitable location by the applicant provided the in-perpetuity management and monitoring of the offset site can be assured.

### **Policy G3 - Cornwall Nature Recovery Network**

Development should contribute to the ability of the Local Nature Recovery Network, as identified on the policies map and specific policies inset maps, to provide functional natural links between existing or potential habitats. Development that would result in the significant reduction of the Network to provide functional natural links between existing or potential habitats will be refused.

### *Pre-submission Consultation Questions*

1. Do Policies G1 – 3 pick up the right issues and principles – is there anything you would add?
2. Is there anything else that should be included in these policies?
3. Do you have an alternative approach to policies G1 – 3 that you think the council should consider?
4. Do you think further clarification or advice on the interplay between green infrastructure design and green space factor (Policy G2) is required for minor developments?
5. Policy G2 requires the provision of Canopy Cover (trees and hedges) as part of biodiversity net gain. Given the Council's commitment to tree planting as a part of the Forest for Cornwall, should this be a separate policy?
6. Or would it be better having a policy requiring a specific proportion of tree provision with a policy setting out a requirement for Biodiversity Net Gain specifically for trees?
7. The mandatory minimum 10% Biodiversity Net Gain figure is specified by DEFRA as being necessary to reverse the decline of natural capital and allow a sufficient buffer to ensure that real net gains are made.
8. There is no legal reason why Cornwall Council could not set a more ambitious local target of 20% but a larger requirement could impact on the amount of developable land on sites or increase the financial contribution required and must be balanced against financial viability. In your opinion should the target be 10% or 20% or another percentage target and why?
9. Metrics are being developed to measure the wider impacts of development on natural capital and eco-system services, such as flood risk and carbon soil storage. Do you agree that a requirement should be made through policy requiring that major developments are accompanied by a basic form of ecosystems metric?
10. There are different potential policy options to increase tree cover including building in requirements to the net gain policy (as per Policy G3) or setting out a separate requirement. How do you think this requirement should be expressed and made simple to understand and implement?
11. Any further comment?

## *Proposed Policies Whole Estate/Farm Plans and rural development*

### **Policy AG1 - Whole Estate/Farm Plans and rural development**

Diversification or improvements that provide public benefits and help to manage or absorb carbon or other emissions and help to maintain a viable and active countryside outside settlements within rural estates and large farms will be permitted where:

1. The proposed development helps deliver the proposals of an up to date Whole Estate or Farm Plan that has been endorsed by Cornwall Council and lead to the development and sustaining of low carbon and wider sustainable practices and a significant reduction in greenhouse gas emissions; and
2. The development proposals deliver multiple social, environmental and economic benefits such as employment and enterprise opportunities, sustainable access, social and cultural facilities, environmental enhancements, conserving and enhancing heritage and landscape assets, and providing improvements to land management in line with the spatial strategies of the Climate Emergency DPD and Cornwall Local Plan and particularly in relation to providing or enhancing ecosystem services and ensure the long-term sustainable operation of the farm business.

### **Policy AG2 Regenerative, Low Impact Development**

Low impact residential development as part of a regenerative use of land will be permitted where the proposal:

1. is located adjoining, or well-related to a settlement or comprises an existing farm or the location can be justified in terms of the activity being undertaken and that travel patterns required for day to day needs can be met sustainably; and
2. is demonstrably linked to a use of the land that will support a self-sufficient lifestyle for the development's occupants and make a positive environmental and social contribution to Cornwall; and
3. can demonstrate through a carbon statement a clear zero-carbon approach to both construction and operation and demonstrate self-sufficiency in energy, waste and water; and
4. can demonstrate that all activities and structures on site will have a low impact in terms of the environment and use of resources. The need for new structures and buildings on the site is minimised and suitable redundant buildings are used before constructing any new buildings; and
5. leads to the environmental and biodiversity regeneration of the site through a binding action plan and conserves and enhances the landscape character, heritage and biodiversity of the site and surroundings; and
6. is tied directly to the land on which it is located, and new buildings are designed to be temporary in nature, have a low impact on the land and be removable and the land restored at the end of an agreed period of time; and

7. demonstrates a management plan for the activity proposed and includes sufficient land to substantially meet the needs and ensure the livelihood of all residents on the site; and
8. provides a trust or other bona fide mechanism for the management and running of the enterprise and the selection of any future residents or activity.

### **Policy AG3 - Air and water quality improvements**

Proposals for agricultural buildings to house livestock, any new or expanded pit, tank or lagoon for storing slurry and anaerobic digesters will be permitted where they resolve potential adverse impacts on air quality from ammonia and other air and water pollutants, including the covering of slurry pits and installation of waste-water treatment systems. Particular weight will be given to proposals with the potential to reduce or remove impact on European Protected sites or a Site of Special Scientific Interest.

For agriculture development requiring the benefit of planning permission and renewable energy proposals the Council will support proposals that lead to a significant improvement to greenhouse gas emissions, water and air pollution and practice, evidenced by a binding farm plan.

### **Policy AG4 – Rural Service Development**

The provision of new rural service and employment hubs (including small scale day to day retail facilities to meet the needs of the settlement or cluster of settlements) will be permitted where they:

1. Are located within or adjoining the settlement that they are intended to serve and do not materially extend the form of the settlement;
2. Enable local employment opportunities and facilities that support the rural economy and/or economy and scale of the settlement and can evidence demand of their need;
3. Deliver digital connectivity and/or working accommodation including hot desking and flexible accommodation that supports the rural economy;
4. Reduce the need to travel; and
5. Protect and enhance the local distinctiveness, character and form of the settlement.

Any housing and retail provision required to enable delivery must be subservient to the main use for employment and community facilities. Any permission granted will be required to ensure the delivery and a mechanism to ensure the ongoing functioning of the community facilities.

### ***Pre-submission Consultation Questions***

1. Do Policies AG1 – 4 pick up the right issues for rural areas – id there anything more that you would add?

2. Are the policy approaches that we are suggesting in policies AG1 – 4 about right – is there anything missing?
3. Do you have specific comments to make about the content or intentions of policies AG1 – 4?
4. Policy AG1 adds to types of exceptional development in the countryside that support the aim for Cornwall to be carbon neutral and provide public goods such as carbon sequestration, flood protection or increases in biodiversity. Should this include allowing small numbers of housing to meet local needs, particularly of the estate and how should this be tied to enabling land management improvements and delivery of our sequestration or biodiversity aims?
5. Policy AG2 adds a further exception for new housing in the countryside based on the creation of zero carbon homes and restorative low carbon agriculture – do you support this exception, and do you think that the policy provides protection against unnecessary development in the countryside?
6. Policy AG4 increases the development types that may be permitted on rural exception sites to help create more sustainable communities. This policy could potentially impact on the ability to deliver affordable housing on exceptions sites. Would you support this approach?
7. Do you have an alternative approach to AG4 that you think the council should consider?
- 8a: In addition to low impact development in Policy AG2, would you support a policy that encourages the development of low carbon co-housing schemes within or adjacent to existing settlements?
- 8b. Should a policy allow for co-housing to be developed on exception sites that would normally be used only for affordable housing where a mechanism for controlling future residents and price can be provided?
9. Any further Comment?

### *Proposed Policies Town Centre Development Principles*

#### **Policy TC1 - Town Centre Development Principles**

Development in town centres should support, maintain or enhance the viability and vitality of the settlement, recognising that they are at the heart of the communities that they serve and may act as a wider service centre for a number of other settlements.

Support will be given for the diversification of uses and increase in the number of residential dwellings in town centres to support its long term sustainable, social and economic stability. This would be achieved through change of use, redevelopment, enhancement of the public realm and promotion of sustainable lifestyles by, for example, reducing the need to travel and improving access to public transport. Regard should be given to how the development proposed would help deliver or support the towns' Place Shaping Vision and Priorities, where such a document exists.

Development of community facilities and appropriate meanwhile uses that maintain or increase footfall and vitality will be supported. The provision of a range of high-quality residential dwellings using underused or redundant spaces will be supported.

All development should complement the local character, cultural heritage and enhance the host building and public realm; where possible improving conditions for active travel, public transport, play and general amenity including green infrastructure and open space and be designed for safety and security. The conversion of ground-floor retail units or redevelopment of buildings should encourage activity and vitality.

### **Policy TC2 – Place Shaping Vision and Priorities, including Town and Town Centre Renewal Priorities**

The Council supports the development of locally led Place Shaping Visions and Priorities to help manage the transition of town centres to community focused and sustainable spaces. Locally produced town centre strategies will be material to determining planning applications.

Vision and Priorities should take a proactive approach to planning for retailing and related community and cultural facilities and services to:

1. support the role of the town centre to secure a sustainable mix of retail, facilities, housing and cultural facilities to create strong, lifetime neighbourhoods;
2. provide a decision-making framework that helps maintain, manage and enhance the vitality of the town and provide a mix of uses including shopping and facilities which provide local goods and services, especially essential convenience and specialist shopping or valued local community assets, including pubs and social facilities;
3. identify areas where it would be appropriate to promote changes of use from retail to other uses and facilities, including the development of high-quality housing for a variety of residents, especially where they are accessible by walking, cycling and public transport and would support the town centre;
4. support attractions and uses that bring people into town such as markets including any facilities or changes to road systems and the creation of pedestrian

focused spaces necessary to accommodate them and to contribute to the vitality of town centres

5. manage and support distinctive clusters of uses to create diversity in town centres and to avoid creating 'dead areas' and support:
  - the broader vitality and viability of the centre and add to its quality and diversity of offer;
  - sense of place and local identity;
  - community safety or security;
  - supporting transport through creating opportunities for accessing a number of facilities and services;
  - health and well-being and the social and cultural value of the centre;
  - improved public realm through green infrastructure provision, including street trees, pocket parks and biodiverse public spaces;
  - opportunities for cycling including the provision of well-located suitable, highly accessible and safe and secure bike parking and storage.

### **Policy TC3 - Diversification of Uses in Town Centres**

1. Development and changes of uses in town centres, including primary retail areas, will be approved where they will positively contribute to a mix of uses so that centres become community hubs that people want to visit.
2. Proposals for redevelopment or larger scale reuse in town centres will be approved where they will help to provide the following benefits:
  - a) sustain and enhance the vitality and viability of the centre;
  - b) accommodate economic and/or housing growth through intensification of existing buildings and spaces;
  - c) support and enhance the competitiveness, quality and diversity of the town centre offer of retail, leisure, employment, arts and cultural, other consumer services and public services
  - d) are in scale with the centre
  - e) promote access by public transport, walking and cycling
  - f) promote safety, security and lifetime neighbourhoods
  - g) contribute towards an enhanced environment, urban greening, public realm and links to green infrastructure
  - h) reduce delivery, servicing and road user conflict, including the creation of pedestrian dominated areas.
3. Splitting of large retail or commercial units that are no longer required or sustainable will be supported where it will create a supply of unit sizes responsive to the local market, support innovation in creating economic resilience and cultural heritage and facilities and maintain or enhance the character and appearance of the host building. The creation of flexible space and mixed uses for meanwhile or collective uses will be encouraged to bring buildings back into use.

4. The provision of cultural facilities, community and non-residential institution uses<sup>1</sup> such as clinics, nurseries or schools should be encouraged and located in places that maximise footfall to surrounding town centre uses.
5. New housing uses should be provided in redevelopment of buildings or sites at a density that maximises the benefits of being sustainably located whilst ensuring that residential amenity is provided for, ensuring that they do not lead to conflict with existing permitted uses or premises<sup>2</sup> in the area.

#### **Policy TC4 – Density of Development in Town Centres**

New residential development in town centres should make best use of land and buildings, taking into account the availability of services within walking and cycling distance and accessibility by public transport.

Development proposals that provide a well-balanced and diverse range of high-quality housing, providing a range of tenures and sizes. A mix of family homes, smaller households, older people's housing and student accommodation will be encouraged.

Development in town centres should not result in the loss of green space and should create opportunities for enhanced green infrastructure and green spaces in line with the Cornwall Green points calculator. Where appropriate developments should contribute to the planting of street trees and the creation of pocket parks.

#### *Pre-submission Consultation Questions*

1. Do Policies TC1 – 4 pick up the right issues for rural areas – is there anything more that you would add?
2. Are the policy approaches that we are suggesting in policies TC1 – 4 about right – is there anything missing?
3. Do you have specific comments to make about the content or intentions of policies TC1 – 4?

#### *Proposed Policies Sustainable Transport*

##### **Policy T1 – Sustainable Transport**

New development should be designed and located in order to minimise the need to travel and support a modal hierarchy which prioritises walking, then cycling, then public transport, then car clubs, electric vehicles and lastly private fossil-fuelled vehicles.

Development should be designed to:

1. Facilitate integration between different modes of travel, especially walking, cycling and public transport. Every opportunity should be taken to connect to, and benefit from, existing walking and cycling networks and to maximise permeability for these modes within and outside of sites;
2. Integrate with the existing settlement through inclusive, active travel networks ensuring easy and sustainable connections to community facilities and infrastructure and enabling connections to potential future travel modes;
3. Provide conveniently located and secure cycle parking, including private home provision throughout the development, including close to the development access points, and benefiting from natural surveillance;
4. Provide an appropriate level of safe, secure, accessible and usable parking provision having regard to policy T2 and reflecting principles set out in Cornwall Design Guide and the level of accessibility by walking, cycling and public transport.
5. Deliver more sustainable streets including by;
  - Making it easier and more attractive to walk, cycle and considering access only streets to create green networks;
  - Enabling greater use of public transport;
  - Making streets accessible for users with disabilities;
  - Providing varied spaces for people to meet and rest, and for children to play, enabling greater social interaction;
  - Incorporating high levels of green and blue infrastructure.
6. Support opportunities for the use of electric vehicles (including electric bikes) by providing electric vehicle charging points with regard to the requirements of Policy T2
7. Within town centres new development should be within a reasonable distance of existing and planned public transport routes. Substantial weight will be given to car-free and low car use residential schemes, including ultra-low emission cars and car club provision.

All developments that generate significant amounts of transport movement should be supported by a Transport Statement or Transport Assessment, that gives details of proposed measures to improve access by public transport, walking, cycling, to reduce the need for parking associated with the proposal, and to mitigate transport impacts in line with guidance set out in the National Planning Policy Framework and reflected in a Travel Plan where one is required.

1.

### **Policy T2 Parking**

Development proposals will be expected to meet the following parking requirements:

1. The following of the travel hierarchy prioritising parking and storage for non-vehicular modes in terms of proximity to dwellings, followed by car club spaces, electric vehicle charging spaces and finally parking for other vehicles; and

2. Proposals should meet the Council's parking standards, including the provision of dedicated cycling facilities, as set out in the Parking Standards Guidance, taking into account opportunities for reducing the need to travel, creating opportunities and incentives for active travel and the local context; and
3. Provide accessible, secure, and convenient cycle parking for all users, located in prominent locations; and
4. Parking provision for vehicles and bicycles should incorporate integrated green infrastructure, street trees and sustainable drainage in line with the Cornwall Design Guide; and
5. Cars should be accommodated in, but not dominate layouts. Car parking areas should predominately be provided off-plot in specifically designed on-street parking bays or other purposely designed spaces that are well designed in terms of safety, supervision, circulation, appearance and assist access by pedestrians and cyclists. Layouts should not increase pressure for parking for off-site parking and should contribute to on-street parking controls where necessary; and
6. Provide electric vehicle charging points in line with the following as a minimum:
  - New residential building where there is associated car parking provision (including buildings undergoing a material change of use to create a dwelling(s)) will provide the opportunity for electric vehicle charging in communal spaces; or
  - New non-residential development with 10 car parking bays or more, will provide at least one charging point per 10 spaces and the infrastructure to enable future installation of charging points in every parking bay, consideration should be given to grouping parking bays to optimise provision of charging infrastructure.

### **Policy T3 - Safeguarding of Transport Infrastructure Sites and Routes**

The Policies map shows former railway track beds and other railway land that should be protected from development that would be prejudicial to the re-use of railway, creation of new travel or distribution networks or the creation of sustainable transport links and facilities.

Where a disused railway line passes through a development site and has the potential for rail reuse or to form part of Cornwall's walking and cycling green network (or does so at present), developers will be required to incorporate/deliver the rail/pedestrian/cycle route as part of their application or provide an acceptable alternative that delivers at least equivalent transport and green network benefits.

#### ***Pre-submission Consultation Questions***

1. Do Policies T1 - 3 pick up the right issues for rural areas – is there anything more that you would add?

2. Are the policy approaches that we are suggesting in policies T1 - 3 about right – is there anything missing?

**WREN consider that the ambitions of Policy T2 with regard to residential electric vehicle (EV) charging do not match the realities of anticipated near-future demand, or Government strategy on EV charging. We have concluded that residential charging demand is unlikely to be met if Policy T2 is not strengthened to include greater commitments for EV charging in residential**

parking spaces. We feel the policy, as it stands, will constrain the widespread uptake of electric vehicles in Cornwall.

3. Do you have specific comments to make about the content or intentions of policies T1-3?

T2.1.):

WREN agrees with this hierarchy and in particular the priority of club cars over privately owned vehicles. Club car spaces may also facilitate shared Autonomous Vehicles (AVs) in the longer term.

T2.6.) i.):

WREN considers this policy point, and specifically the phrase 'opportunity for electric vehicle charging in communal spaces', to be ambiguous and lacking in ambition. This could be interpreted in such a way that no physical charging infrastructure is installed on a new residential development, on the grounds that there is future 'opportunity' for its installation. With no specific definition of what 'opportunity' entails, this policy point lacks commitment.

We would like to highlight the Government's Industrial Strategy on Electric Vehicle Charging for Residential and Non-Residential Buildings (currently under consultation). (<https://www.gov.uk/government/consultations/electric-vehicle-chargepoints-in-residential-and-non-residential-buildings>)

This document states in the summary on page 7:

**Policy position: Residential Buildings**

**The government proposes every new residential building with an associated car parking space to have a charge point. We propose this requirement applies to buildings undergoing a material change of use to create a dwelling.**

We would also like to highlight the National Grid's Future Energy Scenarios 2020 document

(<https://www.nationalgrideso.com/document/173821/download>), specifically page 44, which shows that sales of EVs in Great Britain have more than doubled since 2019, following a very steep increasing curve. The uptake of EVs has accelerated dramatically and the picture in 2020 is very different to that of 2019. We are concerned that this trajectory has not been fully appreciated in Policy T2. 6.) i.).

It is our opinion that in order to align with Government strategy, and to meet near-future demand for EV charging, Policy T2. 6.) i.) should specify that every new residential dwelling with a parking space should have an EV charger, whether that space is private or in a communal hub.

T2.6.) ii.):

WREN considers this policy point to be a good reflection of Government strategy, and appropriate in ambition. We would, however, like to see a minimum standard of 7kW Type 2 charge point equipment defined in the policy.

4. Should we develop a policy to encourage the provision of new distribution facilities at key locations where it can be shown that these would help to consolidate freight journeys, particularly those related to home deliveries of food or goods?

5. Should this specify certain typical locations or specific locations at key transport nodes or interchanges?

### *Proposed Policies Renewables (including geothermal & mine water)*

#### **Policy RE1 - Renewable Energy principles**

Proposals for renewable and low carbon energy-generating and distribution networks, considered in the context of sustainable development and climate change, will be supported where:

1. they contribute to national targets, taking account of the wider environmental, social and economic benefits of renewable energy gain and its contribution toward energy supply; and
2. It will not result in adverse impacts on the local environment that cannot be satisfactorily mitigated, including cumulative landscape and visual impacts, and the special qualities of all nationally important landscapes, heritage assets including their setting which must be conserved or enhanced; and
3. The use allows for the continuation of some form of agricultural or biodiversity use, proportionate to the scale of the proposal; and
4. It provides for a community benefit in terms of profit sharing or proportion of community ownership; and
5. For community-led proposals there is evidence of community consensus in support of the proposal; and
6. There are appropriate plans and a mechanism in place for the removal of the technology on cessation of generation, and restoration of the site to an acceptable alternative use;

All major development proposals should seek to integrate low carbon energy and decentralised energy networks into the proposal. Proposals for development of more than 100 dwellings or non-residential development of over 1,000sq.m will be expected to consider the integration of community energy networks in the development, taking into account the site's characteristics and the existing cooling, heat and power demands on adjacent sites.

Proposals for mechanical and battery storage will be supported. Particular support will be given to renewable energy proposals which provide power direct to an end user (rather than export to the grid).

### **Policy RE2 - Safeguarding Strategic Renewable Energy Sites**

Planning permission for non-renewable energy proposals within areas identified on the Policy Map as being potentially suitable for renewable energy will only be granted where it can be demonstrated that the proposal would:

1. Not introduce adverse impacts within close proximity or interfere with the operation of any installed or planned renewable energy installation; or
2. is a temporary use that will be re-located or removed prior to the renewable energy proposal commencing; and
3. Support energy needs for a specified and limited temporary period of time until it can be replaced by renewable energy and will be limited to as low carbon as possible.

### **Policy RE3 - Wind energy**

Proposals for wind energy development will be permitted where they:

1. Are located in a 'suitable area' identified on the Policies Map or are for the repowering of an existing wind turbine/farm; and
2. Demonstrate that, following consultation, the planning impacts identified by the affected local community have been fully addressed by the proposal; and
3. Demonstrate that impacts as a result of size (height) and scale (number of turbines) and any enabling development such as vehicle access, storage technology etc on the character of the area, are or can be made acceptable with specific reference to the following considerations:
  - Impacts on the natural environment, including biodiversity and landscape character including any cumulative impact of these proposals;
  - are compatible with the Outstanding Universal Value of the Cornwall and West Devon Mining Landscape World Heritage Site;
  - impacts on built and historic assets;
  - the creation of 10% biodiversity net gain;
  - neighbouring land uses and development including adverse impacts on amenity by virtue of noise, visual intrusion and shadow flicker, including cumulative impacts; and
  - cumulative impacts on air traffic safety, radar, reflected light, telecommunications or any such impacts have been adequately mitigated.

**Policy RE4 - Solar Energy Installations**

Proposals for solar arrays that are focused on previously developed land or the repowering of existing solar farms will be supported.

Proposals for solar panel development, including both building mounted and standalone ground mounted installations will be supported where it is demonstrated that:

1. heritage assets will be conserved, in a manner appropriate to their significance, including views important to their setting.
2. impact on visual amenity and neighbouring uses is minimised, including cumulative impact;
3. there will be no adverse impact on aircraft safety;
4. there will be no unacceptable impacts on biodiversity and landscape including cumulative impact
5. the design provides a method to remove the structure and sets out a commitment restore the site.

**Policy RE5 - Geothermal/Mine Water**

The adoption of technologies to generate locally sourced energy, such as deep geothermal and mine water energy will be supported as part of the transition to a low carbon economy. Proposals should demonstrate:

1. Appropriate siting;
2. There will be no unacceptable impact on biodiversity and landscape;
3. Any heritage or historic landscape issues are addressed;
4. Impact on visual amenity is minimised;
5. Community engagement has been undertaken and the proposal takes into account any issues raised.

**Policy RE6 - Community Led Energy Proposals**

Community-led low carbon or renewable energy proposals will be supported where:

1. The impacts arising from the proposal are acceptable or can be made acceptable; and
2. They are community led and there is evidence of community consensus in support of the proposal and/or proposals are brought forward as part of the neighbourhood planning process; and
3. The proposal delivers local social and community benefits; and
4. There are administrative and financial structures in place to deliver/manage the project and any income from it.

**Pre-submission Consultation Questions**

**1. Do Policies RE1 – 6 pick up the right issues for renewables – are there anymore that you would add?**

There are two unnumbered statements in RE1, which should also have the status of “policies”. We agree with developments integrating decentralised energy networks, but consider that the size of development to which it applies should be lower than 100. We welcome the support for mechanical and battery storage.

**2. Are the policy approaches that we are suggesting in policies RE1 – 6 about right – is there anything missing?**

(a) Policies RE3 (wind), RE4 (solar) and RE5 (geothermal) all address methods of generating renewable energy, and so should be very similar. However, they are expressed in very different ways, with wording that is sometimes similar and sometimes very different. This makes it hard to compare policies across the different technologies. For example, RE3 and RE5 do not mention removal of the installation, but RE4 requires that: “the design provides a method to remove the structure and sets out a commitment restore the site.” We consider that the same structure and approach to the wording should be used in all three, subject to our comment (b) below.

(b) Policy RE1 expresses principles, which implies that they apply to all the various renewable energy technologies. However, policies RE3, RE4 and RE5 which apply to specific technologies repeat some of the principles in different wording. For example, RE1 (2) requires that “It will not result in adverse impacts on the local environment that cannot be satisfactorily mitigated, including cumulative landscape and visual impacts, and the special qualities of all nationally important landscapes, heritage assets including their setting which must be conserved or enhanced.” RE3, RE4 and RE5 all refer to some of the same things, but not all of them. Where RE1 and RE3 differ, which will take priority? Having policies which ought to be the same but in fact differ is a recipe for confusion and provides avenues for expensive litigation which ought not to be present. We consider that the principles expressed in RE1 should be taken as applying to RE3, RE4 and RE5, and that within RE3, RE4 and RE5 only matters that are specific to the technology should be stated.

**3. Do you have specific comments to make about the content or intentions of policies RE1 – 6?**

(c) RE1 contains asymmetric treatment of commercial and community-led developments. Item (5) requires that: “For community-led proposals there is evidence of community consensus in support of the proposal.” However, evidence of community consensus is not required of commercial developments. This puts community-led developments at an immediate disadvantage, with a more onerous burden of proof. RE3 requires only “consultation” with the community. RE5 requires only that community “engagement” is undertaken. RE4 does not mention any involvement with the community. There is also no indication of what “evidence of community consensus” actually means. We consider that the requirement to provide evidence of community consensus should be removed from the policies.

(d) Policy RE6 (Community Led Energy Proposals) contains four requirements.

*1) The impacts arising from the proposal are acceptable or can be made acceptable;*  
This repeats what has been said already in RE1 and RE3-5. As argued above, repetition is unnecessary, so this should be removed.

*2) They are community led and there is evidence of community consensus in support of the proposal and/or proposals are brought forward as part of the neighbourhood planning process;*

See comment (c) above. This should also be removed.

*3) The proposal delivers local social and community benefits;*

This is useful in that it distinguishes community-led from commercial developments and can help to prevent a commercial development passing itself off as a community venture. However, more is needed. The purpose of a community development is to deliver local social and community benefits. A commercial development might deliver some small proportion of local social and community benefits, but its main purpose is profit.

*4) There are administrative and financial structures in place to deliver/manage the project and any income from it.*

This is necessary.

We consider that Policy RE6 should focus on defining what a community-led proposal means, and what support Cornwall Council can give

4. Do you have an alternative approach to Policies RE1 - 6 that you think the council should consider?

**5. Is there anything that we could do to further promote or enable community led energy proposals?**

(e) Cornwall Council could make its properties available for community groups to develop, say, rooftop solar PV. The community group could raise the development funds, such as through community share offers, and sell the electricity to the building user. The Council should identify a person or persons to be the contact point for community groups wishing to pursue this approach and create a standard, prompt and efficient process for doing it.

**6. Policy RE1 requires community benefit from renewables installations – do you have any opinion on the form that this should take?**

The community benefit from a commercial installation should be a fixed sum, defined in advance as a condition of planning permission, payable annually and increased by inflation (RPI) each year. It should be for the benefit of defined parishes and towns, within the local area of the installation.

The distribution model used in the Wadebridge area is that the local community energy group, Wadebridge Renewable Energy Network (WREN) Ltd, receives the payment and is responsible for distributing it to local community groups, but does not itself determine which local groups should benefit. This is done by local committees defined for each fund. WREN administers the committees, receives the payment and makes the distribution to local groups. There is a well-defined process

and an easy to use application form. WREN receives a fee for this work. We recommend this approach.

We do not consider a share of profits a suitable method of determining the annual payment. It would be too difficult for a local community to audit the amount of distribution, and too easy for a large organisation to load a local installation with overheads and thus reduce the ostensible profit of the installation.

Similarly, we do not consider local community ownership of a minority interest in an installation to be a suitable structure. A minority interest gives no control and leaves the local community open to charges for its share of unexpected costs.

In both of these cases, the local community would be placing reliance on the goodwill of the installation owner, and whilst the current owner might be a known quantity, future owners, if the installation is sold, would not be.

## *Proposed Policies Energy and Sustainable Construction*

### **SC1 - Energy and Sustainable Construction**

#### **1 - Energy - New Development**

All proposals should embed the Energy Hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping in order to minimise energy demand for heating, lighting and cooling. Proposals should also consider opportunities to provide energy storage where feasible.

Development proposals for 10 or more dwellings and non-residential development with a floor space of 1,000 m<sup>2</sup> or more will be required to submit an Energy Statement that demonstrates how the proposal will:

1. Achieve a 19% carbon reduction improvement upon the requirements within Building Regulations Approved Document Part L (or achieve any higher standard than this that is required under new national planning policy or Building Regulations) based on energy efficiency measures;<sup>3</sup> and
2. Provide on-site renewable energy generation, or connection to a renewable or low carbon community energy scheme, that contributes to at least a further 20% reduction in the residual carbon emissions subsequent to 1) above; and
3. Provide onsite natural carbon offsetting/make financial contributions to Cornwall Council's carbon offset fund in line with Policy SC2 to enable all residual carbon emissions subsequent to 1) and 2) above to be offset by other local initiatives.

Developments will be required to connect to existing district energy networks in the locality or, where there is a future network planned, to be designed to be capable of connection to that network. Where appropriate, proportionate contributions will be sought to enable a network to be established or completed.

## **2 - Energy - Existing Buildings**

Significant weight will be given to the benefits of development resulting in considerable improvements to the energy efficiency and reduction in carbon emissions in existing buildings. Proposals that help to increase resilience to climate change and secure a sustainable future for historic buildings and designated and non-designated heritage assets will be supported where they conserve and where appropriate, enhance the design, character, appearance and historical significance of the building.

## **3 - Domestic renewables**

The Council will support domestic renewables such as solar panels where they Require planning permission. Proposals should seek to minimise visual impact and not impact upon the appearance of the property when viewed from the public realm. Where fixed to a listed building proposals must ensure that: technology will not cause harm to the appearance and special historic character of the building; require minimal intervention with the fabric of the building; and shall be easily reversible.

## **4 -Water**

All dwellings (including conversions, reversions, change of use and extensions) must achieve an estimated water consumption of no more than 110 litres/person/day through the incorporation of water saving measures and should incorporate water reuse and recycling and rainwater harvesting wherever feasible.

## **5 - Materials and Waste**

All development proposals should minimise use of materials and creation of waste through:

1. Prioritising the use of previously developed land and buildings where possible, whilst maintaining and enhancing local character and distinctiveness;
2. Reuse and recycling of materials that arise through demolition and refurbishment, including the reuse of excavated soil and hardcore within the site;
3. Prioritise the use of locally sourced, sustainable materials and construction techniques that have smaller ecological and carbon footprints;
4. Using locally distinctive, resilient, low maintenance materials that are appropriate for Cornwall's damp maritime climate (for example locally won materials such as slate and granite) as described in the Cornwall Design Guide;
5. Considering the lifecycle of the development and surrounding area, including how they can be adapted to meet changing community needs and how materials can be recycled at the end of their lifetime; and
6. Providing adequate space to enable and encourage greater levels of recycling across residential and non-residential developments. Space requirements for residential developments should follow those outlined in the Cornwall Design Guide.

## Policy SC2 - Protecting Natural Carbon Storage

All major development proposals shall include a Carbon Storage Calculation showing the difference between the carbon storage capacities of the pre and post development habitat on the site. Any loss of carbon storage shall be compensated for with a carbon offsetting contribution towards natural climate schemes within the Local Nature Recovery Network or through a suitable carbon reduction technology.

### Pre-submission Consultation Questions

1. Do Policies SC1 and 2 pick up the right issues for sustainable construction – are there anymore that you would add? **New build and existing housing stock is given the same weight in the policies ; new build is a relatively easy target for carbon reduction, but the numbers of new build are relatively small compared to the existing stock. Therefore there should be more targeting of old stock in the carbon reduction strategy. The barrier to be overcome is the lack of investment funding in older housing stock. Much of the low hanging fruit has already been picked through cavity wall and loft insulation. There is a need to create a Cornish investment fund for insulating the existing stock, one that does not repeat the disastrous failure the now defunct UK Government Green Deal. There are many organisations including community energy groups in Cornwall, and national centres of expertise that could help design workable schemes.**

2. Are the policy approaches that we are suggesting in policies SC1 and 2 about right – is there anything missing?

3. Do you have specific comments to make about the content or intentions of policies SC1 and 2? **The intentions are good, but the devil is in the detail. Is there to be a standardised methodology provided by Cornwall Council which the carbon reduction figures will be calculated by applicants ? If the policy is going to have teeth, i.e. reduce carbon, the calculations need to be derived from a standard formula that has a clear evidence base to verify them. Unless there is a standardised methodology the proposals cannot be properly assessed by planners.**

**Offsetting where energy reductions and / or connecting to renewables cannot be achieved ; presumably this will be priced according to the amount of carbon that the developer has not saved. Again, the standard calculation formula is important here, as is the price of carbon that is charged to the developer – the price should be set as high as can be scientifically defended, presumably by reference to an external index that prices in the full cost of the contribution to climate change and its effects.**

4. do you have an alternative approach to Policies SC1 and 2 that you think the council should consider?

5. Do you think that a Sustainable Development Checklist covering categories including energy, water, materials and waste, resilience, health and wellbeing with different requirements for different sizes of development proposal should be introduced? **Yes – so that the approach is holistic and not siloed. Where**

developers choose to use construction methods which have high levels of embedded carbon, they should be required to mitigate this through offsetting. Proper carbon pricing, reflecting the real cost of carbon-caused damage to the climate, should be charged.

6. Should development proposals be required to conform with an external standard such as BREEAM or a bespoke requirement made up of elements of the former Code for Sustainable Homes? Cornwall Council should create a bespoke requirement made up of elements of best practice i.e. standards equivalent to passivhaus. Clearly this will be unpopular with housing developers as it incurs higher construction costs. The counter argument to be made to this is that a house built to passivhaus standards can command a premium sale price as its running costs (recurrent over many years) are of value to its occupiers.

### *Proposed Policies -Coastal Change and Flooding*

#### **Policy CC1 - Coastal Vulnerability Zone**

The Coastal Vulnerability Zone is defined on the policies map.

1. New development including replacement buildings (unless classified as exempt) within the Coastal Vulnerability Zone will only be permitted where it can be demonstrated through a Coastal Vulnerability Assessment that it:
  - a) Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan; and
  - b) would not impair the ability of communities and the natural environment to adapt sustainably to the impacts of coastal change; and
  - c) will be safe through its planned lifetime, without increasing risk to life or property; or
  - d) is a garden or other open area; and
  - e) where applicable, makes provision for coastal access and the South West Coast path to be moved inland; and
  - f) would not affect the natural balance and stability of the coastline or exacerbate the rate of shoreline change to the extent that changes to the coastline are increased nearby or elsewhere.

Exceptions will only be granted where it can be demonstrated that a time limited permission would be consistent with the above criteria.

2. Private sea defences or cliff stabilisation works will only be permitted where it can be demonstrated that the works would accord with wider coastal management objectives and are:
  - a) consistent with the Shoreline Management Plan; and
  - b) required for public health and safety purposes.
  
3. Soakaways and other infiltration based sustainable systems within 5 metres of the Cornwall Coastal Vulnerability Map (CCVM) zone or discharge of surface water over or down the face of a cliff will not be permitted unless demonstrated through a Coastal Vulnerability Assessment that the proposed drainage method would not adversely affect coastal stability.

### **Policy CC2 – Candidate Coastal Change Management Areas**

Areas designated as candidate Coastal Change Management Areas are defined on the policies map. Proposals for development within these areas will be determined in accordance with Policy CC1 and the provisions of any Coastal Change Management Plan prepared for the area.

Where development and infrastructure need to be relocated away from the Coastal Change Management Area it will be permitted subject to the following criteria: -

- The development conforms to the requirements of any adopted 'Coastal Change Management Plan' and any allocated area in a Neighbourhood Plan or other planning document;
- The new development is located in an area demonstrated to be at less risk of coastal erosion;
- The replacement property is located close to the community from which it is displaced and has an acceptable relationship with it in terms of character, setting, and local amenity;
- The new development meets the requirements of policies on protected landscapes and the Undeveloped Coast;
- The site of the building or use to be replaced is cleared and restored; and
- If it is a replacement proposal, the replacement dwelling should be broadly comparable to the size, scale and bulk of the dwelling being replaced and of an appropriate scale and character to its location.

### **Policy CC3 – Reduction of Flood risk**

Development proposals will be supported where they are designed to reduce flood risk to the application site and its surroundings. Proposals should:

1. Use the Environment Agencies latest Flood Risk maps, including predictions for climate change;

2. Use the Environment Agency's latest surface water flood risk map to identify and constitute existing flow exceedance routes and demonstrate how these routes are diverted and maintained as part of their Flood Risk Assessments; and
3. Be informed by an assessment of the general drainage and impact of flooding on both existing and proposed development, including the existing and proposed ground conditions and ground water conditions and rights of discharge.
4. Prioritise the use of above ground/at-grade Sustainable Drainage Systems (SuDS), including retrofit SuDS and where feasible within existing town centres, commercial and retail areas, and redevelopment projects; and
5. Demonstrate how the design of buildings and the surrounding environment (including pavements, highways, parking areas, driveways, gardens, public green spaces, planting and drainage) has been planned to be resilient to the ongoing and predicted impacts of climate change, including the design of road surfaces and drainage systems to cope with more frequent episodes of extreme heat and rain.

Proposals for more than 50 dwellings or non-residential structures of 1000 square metres within a Critical Drainage Area must contribute to Natural Flood Management measures such as land management, tree planting, hedge restoration etc.

#### **Policy CC4 – Sustainable Drainage System Design**

Sustainable Drainage Systems (SuDS) proposals must be designed to achieve the following criteria:

1. maximise the benefits to the sense of place, amenity and biodiversity; and
2. reduce the overall level of flood risk on the site and the surrounding areas; and
3. not increase flood risk elsewhere; and
4. provide attractive, biodiverse and non-buried systems; and
5. Incorporate SuDS within greenspace, blue and green infrastructure, amenity, and biodiversity schemes to manage surface water flows, improve water quality, educate and improve the wellbeing of communities; and
6. where built into public green or open space have sufficient room to provide a safe, naturalised system without the need for fencing or barriers; and
7. provide for simple and straightforward maintenance, including the provision of a plan and mechanism for on-going maintenance.

#### ***Pre-submission Consultation Questions***

1. Do Policies CC1 - 4 pick up the right issues for coastal change and flooding – are there anymore that you would add?
2. Are the policy approaches that we are suggesting in policies CC1 - 4 about right – is there anything missing?

3. Do you have specific comments to make about the content or intentions of policies CC1 - 4?
4. do you have an alternative approach to Policies CC1 - 4 that you think the council should consider?
5. An alternative policy option to CC2 could be to allocate full Coastal Change Management Areas on adoption of the DPD. This would require the publication of mitigation plans for each of the areas. We do not support this option as we believe that the level of assistance that we could provide for each area would be limited given the number of settlements impacted. Would you support this, or should we consider an alternative approach?

**Thank you for taking the time to respond.**

**Please ensure your response reaches us by 5pm on Friday 25<sup>th</sup> September 2020.**

By email to: [climateemergencydpd@cornwall.gov.uk](mailto:climateemergencydpd@cornwall.gov.uk)

By post to:

Climate Emergency DPD

Cornwall Council – Planning

PO Box 676

Threemilestone

Truro TR1 9EQ

Telephone: Tel: 0300 1234151

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:

19 and under

50-59

20-29

60-69

30-39

70+

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).

Asian or Asian British

Mixed (e.g. White and Asian)

Black or Black British

Other, ethnic group

Cornish

White (e.g. British, Scottish)

Do you consider yourself to be disabled?

Yes

No

**Thank you! / Meur ras!**