Tree Canopy Statement

For two wind turbines on Land at Dubbers China-Clay Works,
Nanpean, St. Stephen-in-Brannel, PL26 8XT.

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1. Introduction

1.1.1 Policy G3 – Tree Canopy was introduced through the Cornwall Council Climate Emergency Development Plan Document, adopted on the 21st of February 2023. The policy had a phased introduction, and since the 15th of June 2023 it a required consideration for all major development applications in Cornwall.

1.1.2 As the proposal constitutes a major development, it therefore triggers the requirement to consider Policy G3.

2. Policy

2.1.1 Policy G3 states that *"all major development should provide, through the retention of existing and/or the establishment of new trees, canopy coverage equal to at least 15% of the site area."*

2.1.2 The policy aims to increase tree canopy cover across Cornwall, supporting climate resilience, biodiversity enhancement, ecosystem services, and human health benefits.

2.1.3 However, the policy recognises that achieving 15% canopy cover may not always be appropriate or feasible. It provides that:

'Where there are significant ecological, historical, landscape, or operational reasons to justify a canopy requirement of less than 15% on site and this can be fully evidenced, an alternative percentage of canopy provision shall be agreed with the Council'.

3. Site Restrictions

3.1.1 Due to operational and spatial constraints, it is not considered reasonable or practicable for the proposal to accommodate 15% canopy cover on site.

3.1.2 Trees located near wind turbines can adversely affect their performance by disrupting wind flow, reducing wind speeds, and increasing turbulence. These effects would negatively impact turbine efficiency, reduce energy generation, and increase mechanical stress over the turbines' operational lifespan.

3.1.3 A reduction in energy output would directly conflict with Policy 14 of the *Cornwall Local Plan*, which seeks to *"maximise the use of available renewable resources"*, as well as

Policies RE1 and RE2 of the *Climate Emergency DPD*, which promote optimisation of renewable energy potential while addressing environmental impacts appropriately.

3.1.4 The site lies within the St Austell or Hensbarrow China Clay Area (LCA17), a distinctive and dramatic landscape characterised by china clay waste tips, pits, and rough vegetation. The surrounding landscape is a mix of industrial and agricultural land, enclosed intermittently by hedgebanks and hedgerows.

3.1.5 The Dubbers Dam Woodland Project, an external tree-planting initiative located within the vicinity of the proposed turbines, will significantly increase canopy cover in the local area. Although this scheme is not linked to the proposed turbines, it will deliver considerable additional tree planting near the development site.

3.1.6 Given the extent of existing and proposed woodland in the area, additional on-site tree planting would be both operationally and spatially impractical. Consequently, the Applicant is unable to achieve a 15% canopy cover within the development boundary.

4. Biodiversity Net Gain

4.1.1 Notwithstanding the above constraints, the Applicant is committed to delivering a Biodiversity Net Gain (BNG) above the 10% minimum required under Policy G2 – Biodiversity Net Gain. The proposed BNG plan would achieve a 11.37% net gain in habitat areas.

4.1.2 The proposal includes the creation of 3.926ha of modified grassland in place of existing unvegetated ground, 0.167ha of other neutral grassland along a vegetated bank and 0.118ha of mixed scrub in place of modified grassland and vacant land.

5. Conclusion

5.1.1 Cornwall Council's planning policy appropriately prioritises measures that mitigate climate change. However, in this case, a balance must be achieved between maximising renewable energy generation and providing additional canopy cover.

5.1.2 It is concluded that the site cannot feasibly deliver 15% tree canopy cover due to operational constraints and the presence of the nearby Dubbers Dam Woodland Project. Instead, the proposed BNG reflective of the established local landscape character represents an appropriate and effective alternative means of delivering biodiversity and landscape benefits in accordance with Policy G3 objectives.

5.1.3 Optimising the wind resource at this location is essential to support Cornwall's transition to renewable energy. The proposed development is expected to generate over 25GWh of clean electricity annually, sufficient to power approximately 5,500 Cornish homes, making a significant contribution to local and regional renewable energy targets.