

## **Solar Energy SPD: Comments from the City of Durham Trust**

1. The City of Durham Trust welcomes the fact that Durham County Council has produced this Supplementary Planning Document as a contribution to responding to the climate crisis.
2. The structure of the document is very clear with separate sections on Small (households), Medium (business and community) and Large (commercial solar farms) installations. Much of what is said about Medium installations also applies to Large ones.
3. The SPD concentrates on offering practical guidance on making planning applications for the installation of solar energy systems. Planning permission is required for all Medium and Large installations, but the picture is less clear for Small ones. Permitted Development Rights and the constraints of Article 4 Directions are dealt with, but the advice is at times rather vague and sometimes amounts to the need to seek further advice. Surely as much advice as possible should be incorporated within the SPD so that householders know what the possibilities and the restrictions are.
4. There is a welcome emphasis on protecting heritage, landscape and biodiversity in accordance with local and national requirements. The SPD should also have regard to Neighbourhood Plans where they deal with renewable energy.
5. The Trust is pleased to learn that the Council is producing detailed guidance on the use of renewables on historic buildings as part of a whole-life building approach. Design requirements need to keep abreast of the latest technological improvements, particularly when considering solar installations in conservation areas and especially within the World Heritage Site. Heritage Impact Assessments should definitely be required.
6. The Trust is pleased that the SPD recognises that only 4% of the County's land is designated as Green Belt, so there is absolutely no justification for locating solar farms in the Green Belt.
7. The most valuable agricultural land and public rights of way must also be protected. The Trust is supportive of the campaign by CPRE promoting the use of large roofs for solar arrays rather than taking up valuable agricultural land.

8. A positive feature is the way in which the SPD integrates its guidance with local (County Durham Plan) and national (NPPF) policies.
9. However, it relies on these policies for very general targets for the introduction of renewable energy systems in the longer term. One major weakness is the lack of any specific short-term targets in the local context. This obviously makes it impossible to measure progress.
10. The other major weakness is that it does not do enough to promote and encourage solar energy. In particular, it contains no requirements to fit solar energy systems to new buildings; the focus is on fitting them to existing buildings. County Durham Plan Policy 29 and Durham City Neighbourhood Plan Policy S1 both promote sustainable design which includes the use of solar energy.
11. Policy 29 requires all development proposals to "minimise greenhouse gas emissions" including by "providing renewable and low carbon energy generation". This SPD would be the best vehicle to set out what is expected of new developments, including housing. It should include guidance on the orientation of buildings and roof design to optimise energy generation, solar gain and energy-efficient ventilation, supporting the Building for Life SPD in this regard.