

Solar Energy Supplementary Planning Document 2nd Consultation
Comments from the City of Durham Trust
22nd March 2024

We welcome the changes made to the Solar Energy Supplementary Planning Document (SPD) which have addressed most of the issues we raised in our response to the previous consultation. However, there are a few issues that still need to be covered in the SPD itself, plus other issues that we would urge the Council to cover in other actions outside the Solar Energy SPD.

An important aspect that is still not covered by the SPD is that of guidance on how to design new buildings to facilitate and optimise energy generation, solar gain and energy-efficient ventilation, supporting the Building for Life SPD in this regard. The approach of the SPD for small and medium scale developments seems to be the addition of solar panels to a building, but not additionally appropriate design guidance for new buildings. There is external guidance available on this e.g.

- <https://arka360.com/ros/integrating-solar-energy-with-building-design-a-guide-for-architects-and-builders/>
- <https://www.renewableenergyhub.co.uk/blog/solar-ready-buildings-how-design-impacts-solar-installations>
- https://www.oadby-wigston.gov.uk/files/documents/adopted_renewable_energy_supplementary_planning_guidance_pages_17_to_33/Adopted%20Renewable%20Energy%20Supplementary%20Planning%20Guidance%20pages%2017%20to%2033.pdf

Therefore the Solar Energy SPD should contain a section covering this aspect.

Additionally, as well as referring to CDP Policy 29 a brief mention should be made of the Futurehomes Standard which will be introduced nationally through building regulations and implemented in 2025.

We appreciate the Council's argument that this SPD does not have the scope to require all new developments to incorporate solar energy and welcome the Council's commitment to consider this through the County Durham Plan (CDP) review. However, we feel that Policy 29 could be interpreted far more strongly in advocating that new builds should incorporate solar panels as it states in section 'c' "by seeking to achieve zero carbon buildings and providing renewable and low carbon energy generation". In our previous response we noted the major weakness of lack of any specific short-term targets for solar energy, and the Council's response that this covered under the Council's Climate Emergency Response Plan. We appreciate the Council's argument that the Solar Energy SPD may not be the place to cover this weakness. However, with reference to a stronger interpretation of Policy 29 with respect to solar panel installation, some targets could surely be set.

By comparison, CDP Policy 21 is concerned with "Promoting sustainable transport". Its concluding paragraphs set out the principles for determining car parking provision at developments, for example ensuring that "a sufficient level is provided for both occupants and visitors". No numeric rates of provision are given. The recently adopted Parking and Accessibility SPD sets out detailed tables with the rates required. The Trust fails to see how this differs from the status of the Solar Energy SPD in relation to Policy 29(c). Just as the Parking and Accessibility SPD sets out the detail for car parking provision in different types of development, so the Solar Energy SPD can set out the generation requirements expected of developments. In each case there are costs involved. The requirements for land for car parking are far from negligible and can affect the viability of development. There are costs, too, for solar panel installation, but the panels will pay for themselves

through energy generation over time. Such objections to compelling developers to install panels can be handled through appropriate clauses regarding viability assessment if necessary.

The Council's response to the Trust was that "requiring all new developments to incorporate solar energy development would go beyond the scope of planning guidance". If the contention is that this would go beyond what is compatible with national planning policy and guidance, how is it that Cornwall Council has adopted in February 2023 a revision to their local plan entitled the Climate Emergency Development Plan Document which includes policy SEC1(2b) which requires all residential development to generate on-site sufficient energy to match the total energy consumption, "with a preference for roof-mounted solar PV". This has been examined and approved by an Inspector, so must accord with planning guidance. See: <https://www.cornwall.gov.uk/planning-and-building-control/planning-policy/adopted-plans/climate-emergency-development-plan-document/#cedpd>

The idea of requiring solar PV generation in developments clearly does not go beyond planning guidance, because of the example of Cornwall Council's examined and adopted Plan. Neither does it appear to go beyond what can be achieved via an SPD, given the example of the elaboration of Policy 21 achieved via the Parking and Accessibility SPD. The Trust therefore asks the Council to reconsider its response.

The Trust accepts that if this matter is to be addressed then the Council will need to develop the evidence base and suitable targets. In the Council's response to this issue they are relying on a high level generic target: "We have committed to reaching Net Zero by 2030 with an 80% real carbon reduction to our [DCC] emissions. We will work with partners and communities to achieve a carbon neutral County Durham by 2045." The Climate Emergency Response Plan document cites specific projects by the DCC and other organisations working on solar energy. However there is no specific target for the level of solar energy to be achieved in County Durham by a specific date. There is a statement for what could be potentially achieved on p.41 of this document: "We could contribute 25% of the effort required to meet Durham's target by generating an additional 25,000MWh of electricity in County Durham, which could be achieved by constructing either 30MW of solar or 10MW of wind turbines. Each of those would be expected to achieve around 25,000MWh electricity per year in Durham though it would be more practical to have a mixture of different generating technologies." However, this is not set as a target. There is also no specific monitoring of solar energy production other than this generic statement on p.99 "In the Council, a new Net Zero Carbon Board has been established that oversees all the Council's work as it relates to climate change. With high level strategic engagement across all departments this Board ensures that progress is measured, monitored, and scrutinised." This is a clear weakness in any strategy to increase solar energy production in the County, though this may need to be addressed outside the SPD process. The plan document is current to 2024 so the review of this document could be the time for specific targets and monitoring of these targets to be put in place.