Appendix 6

Energy Efficiency, Renewables and the Historic Environment Supplementary Planning Document Consultation Statement

March 2024

1.0 Introduction

1.1 This Consultation Statement has been prepared in accordance with Regulations 12 and 13 of the Town & Country Planning (Local Planning) (England) Regulations 2012 and the council's Statement of Community Involvement.

2.0 What was consulted upon?

2.1 The Energy Efficiency, Renewables and the Historic Environment Supplementary Planning Document (SPD) was subject to a six-week period of consultation between 23 October and 3 December 2023.

3.0 Why is the SPD needed?

3.1 The Energy Efficiency, Renewables and the Historic Environment SPD sets out guidance for property owners considering making energy efficiency or renewable energy improvements within the historic environment. This can include works to listed buildings, non-designated heritage assets and to properties within conservation areas. It contains detailed guidance relating to different types of renewable energy provision such as solar panels, heat pumps, wind turbines, biomass and electric vehicle charging points.

4.0 Area of coverage

4.1 The SPD covers the whole of County Durham.

5.0 Steps the council took to publicise the draft SPD.

5.1 The council publicised the draft SPD by:

a) emailing consultees on the planning policy consultation database;
b) publicising via the council's online consultation portal;
c) making hard copies available in Durham County Hall and Customer Access Points;
d) making the SPD available on the council's website;
e) online events with the public and the industry;
f) using the council's corporate notifications and social media outlets; and
g) press release.

6.0 Outputs from online events

6.1 Two online events were held during the consultation period on Wednesday 7 November from 5:30pm to 7pm, and on Tuesday 14 November between 10am and 11.30am.

7.0 Formal responses to the consultation

7.1 Four representations were received to the formal consultation from City of Durham Parish, City of Durham Trust, Belmont Parish Council and Philip Newbold, which are set out in full alongside the council's response in Appendix A.

7.2 In summary responses highlighted the following key issues:

a) Document welcomed.
b) The document needs to reflect the realistic potential of certain forms of renewable energy in many historic settings.
c) Needs to reference to enforcement with regards to replacement of traditional windows and doors and shutters with unsympathetic modern alternatives, especially in Durham City.
d) Solar panels can be installed in conservation districts and on Listed buildings if heritage impact appropriately mitigated. The same is true for other energy efficient modes of heating, such as heat pumps.
e) Refinement needed with regards to grading system in the document, for example solar slates are significantly less detrimental to an area than roof mounted solar PV.
f) Solar should emphasised as the most important renewable however the document does not link solar panels to batteries and early hours feed of much cheaper electricity from the network which is now available. This combination is capable of providing year-round provision of electrical energy, almost at zero cost in the summer months and at relatively low cost in the darker and colder winter months. The charging of electrical cars also benefits from this system.
g) There is no mention of Mechanical Ventilation with Heat Recovery (MVHR), which can provide good indoor air quality while recycling a high percentage of the space heating.
h) There is no mention of the effect of the presence of protected species (such as bats, swifts, etc.) in old buildings which are being restored, re-purposed or modernised.

8.0 Changes to the SPD

8.1 Following consideration of the feedback received a number of changes were made to the SPD. Key changes include:

a) Additional references have been added to encourage retention of existing traditional fabric.

b) Amendments have been made to the SPD to take into account feedback, including with regards to MVHR, batteries and protected species.
c) The gradings have been revisited as recommended by Belmot Parish Council, to better reflect the relative harm and acceptability of solar slates and roof mounted PV panels.

9.0 Next Steps

9.1 The SPD will be subject to a second stage of consultation from 3 June to 14 July 2024. The consultation will be publicised using the following methods:

a) emailing consultees on the planning policy consultation database;
b) emailing those who responded to the first stage of consultation or attended an online event;
c) publicising via the council's online consultation portal;
d) making hard copies available in Durham County Hall and Customer Access Points;
e) making the SPD available on the council's website;
f) online events with the public;
g) using the council's corporate notifications and social media outlets; and
h) press release.

Appendix A – Formal consultation responses

Respondent	Comment	DCC Response
City of Durham Parish Council	Section 1 provides a background context. It identifies the Heritage Aspects, the Fundamental Principles involved, a brief consideration of Energy Generation, and a worthwhile guidance of Step-by-Step Planning. The Policy Context identifies 5 relevant CDP policies. It is unfortunate that one of these, Policy 33, is probably the worst policy in the entire CDP. It needs updating and a total redraft. The consideration of Planning Requirements is good, but it must taken into account when planning decisions are made. Section 2, Detailed Guidance – Energy Efficiency Measures, is welcome. The subsections on Windows, Doors, Roofs, Walls and Floors are all to be commended as is the recommendations on Building Services. However, this section does not consider the use of appropriate heating panels bearing in mind that gas heating and open coal fires have rightly been discounted and therefore online electrical heating is almost the only form of heating available. The most efficient use of these panaels should be identified either in this sub-section or the next one. The sub-section on Renewable Energy Provisions could be improved. It rightly leads with Solar energy and Solar PV (roof mounted). It is by far the most important renewable energy source when dealing with the Historic Environment. It very rightly offers a cautionary approach to the impact of attaching solar panels to 'historic roof structures'. Its caution that "when selecting panels, care should be taken to select discreet styles" is to be applauded. However, a	Policy 33 redraft, outside scope of SPD Ground mounted PV noted. Document covers all of County Durham and is an example of a feature which may be appropriate in more locations where there are less constraints in terms of space. Airsource/Ground source heat pumps – constraints are highlighted in document, but should be left in as the document is covering all heritage assets and on occasion may be something to consider. Biomass – consideration was given to its inclusion within the document, but on a county-wide basis this may be an option for consideration in certain circumstances.

	further constraint should be included here that the panels should he used that match the historic environment, rather than just ‘discreet, for these are now becoming available on the market and should be encouraged. Furthermore, this discussion misses the essential need to couple the solar panels to batteries and early hours feed of much cheaper electricity from the network which is now available. This combination is capable of providing year-round provision of electrical energy, almost at zero cost in the summer months and at relatively low cost in the darker and colder winter months. The charging of electrical cars also benefits from this system. The other sources of renewable energy have little to recommend them in the historic environment. Ground mounted Solar PV might occasionally be available if the setting allows, but many buildings offer neither the space or location suited to this drawdown of solar energy. Air Source Heat Pumps are ugly and, being seasonally dependent, inefficient, and would not enhance the locations envisaged. Ground Source Heat Pumps are important in new build situations but retrofitting to historic environments must not be encouraged. Biomass has limited value, involves storage of the fuel, and should be discounted. Section 3 offers a useful summary in the form of Additional Links with guidance to other documentary links. In summary, this document is welcome, well written and informative. It is, however, worth noting the few criticisms contained in this response and maybe amending the final draft to address them.	

City of Durham Trust	Two areas of concern are replacement of historic windows and doors, and placement of solar panels on historic buildings. This policy document is strong on the need to replace historic windows sympathetically, ideally with like for like replacements in traditional materials. Wooden windows are to be preferred to uPVC. However, we would like to emphasise the need for this policy to be enforced – that is, to conserve where possible, replace sympathetically, ideally in traditional materials. External historic doors also need to be sensitively replaced in traditional materials. There are already too many examples of uPVC doors in conservation areas in Durham City. Moreover, the sensitive preservation of historic doors should also apply to interior doors. On energy efficiency, it should be noted that window shutters can be a traditional means of energy efficiency. Internal and external shutters are a strong tradition in Durham, and ought to be encouraged to be maintained and even used more widely. Solar panels can be installed in conservation districts and on Listed buildings. King's College Cambridge is currently renewing its lead roof with solar panels. Durham Cathedral and buildings in historic settings could do the same if heritage impact appropriately mitigated. The same is true for other energy efficient modes of heating, such as heat pumps. We note that Historic England has recently published a consultation document on Climate Change and Historic Building Adaptation, which might inform County Durham Council's practice. See:	Additional reference to retention of existing fabric added. Shutters referenced in table. Comments noted. Wood preference to upvc – reference made to retention of existing fabric. Choice of appropriate traditional materials covered by policy 44 of CDP. Historic England document has been consulted, but is only in draft form so not referenced in SPD directly.

	Climate Change and Historic Building Adaptation - draft for consultation (historicengland.org.uk)	
Belmont Parish Council	The direction of this SPD is supported. It provides a good summary of improvements that can be made to properties to increase their environmental efficiency. We do, however, feel that there is some confusion in the relative risks associated with the different types of development, and the colour coding that has been assigned to them. To take a couple of examples, we feel that solar slates are significantly less detrimental to an area than roof mounted solar PV. However, they have both been classified as red in the traffic light system, in spite of the risk being defined as low-medium. We recommend solar slates should be re-classified to amber. Additionally, we consider they are a much lower risk that air source heat pumps and should be shown as such on the scale – unless the mitigation to visual amenity of Air Source Heat Pumps are further strengthened. Overall, we feel that the document adds clarity in relation to environmental enhancements to properties.	Gradings revisited and regraded in document as noted. Reference to airsource heat pumps mitigation.
Philip Newbold	There is passing reference to 'ventilation' and good advice on allowing old buildings to breathe by avoiding the use of impermeable materials for insulation and airtightness. There is no mention of MVHR, Mechanical Ventilation with Heat Recovery, which can provide good indoor air quality while recycling a high percentage of the space heating There is no mention of the use of storage batteries in conjunction with solar PV panels which can make a	MVHR – reference has been included. Batteries – references added. Protected species – references added in document.

	significant contribution to reducing reliance on grid electricity. If you can take advantage of lower night-time tariffs for electricity, storage batteries can play a significant part in reducing grid electricity demand, especially in summer months There is no mention of the effect of the presence of protected species (such as bats, swifts, etc.) in old buildings which are being restored, re-purposed or modernised. Protected species can cause significant hinderance to the introduction of energy conservation measures, ventilation systems and renewable technologies, especially in roof voids. Their presence also causes serious delays to the progress of the works and hence costs are significantly increased	