

Solar on Car Parks and Electric Vehicle Charging - Historic England Response

Part One: Solar Canopies on Car Parks

Introduction

Q: What type of stakeholder is responding? Other

Historic England is the government's statutory adviser on all matters relating to the historic environment in England. We are a non-departmental public body established under the National Heritage Act 1983 and sponsored by the Department for Culture, Media and Sport (DCMS). We champion and protect England's historic places, providing expert advice to local planning authorities, developers, owners and communities to help ensure our historic environment is properly understood, enjoyed and cared for.

We welcome the opportunity to respond to part one of this call concerning mandatory solar canopies on car parks. We have focused on planning-related questions where there is potential to impact on the historic environment. The planning system is not a barrier to delivery but is essential to ensuring it is done in a sustainable manner. In planning terms this means pursuing interdependent and mutually supportive economic, social and environment objectives including protecting and enhancing our natural, built and historic environment. The delivery of canopies, which evidently bring clear benefits, should ensure mechanisms are in place to secure appropriate design and siting.

Main Questions

Section 2: Benefits and Section 3: Costs

Q: Do you agree that we have identified all the potential wider societal benefits? (paragraph 2.4)

Q: Do you agree that we have identified all the costs of this proposal to wider society? (paragraph 3.4)

Solar canopies can deliver societal benefits including energy generation for local businesses and communities as outlined in section 2. In planning terms, if well-designed and appropriately sited, they can make more effective use of land and reduce the pressure for solar panels in more sensitive locations. They also offer opportunities to combine equipment such as electric vehicle charging points which could reduce street clutter and limit archaeological impact from groundworks.

Whilst section 3 concentrates on the financial costs of canopies, consideration must be given to wider societal costs including the potential for poorly designed and sited canopies to

¹ Solar on car parks and electric vehicle charging - GOV.UK

² National Planning Policy Framework (2024) Paragraph 8



undermine a valued sense of place and harm the significance of heritage assets. A blanket approach is unlikely to be consistent with statutory obligations for conservation of the historic environment, such as the desirability of preserving or enhancing the character and appearance of conservation areas and international obligations in world heritage sites. ³

Section 4: Barriers to Implementation

Q: Do you agree that we have identified all the major barriers to the installation of solar canopies, or have we omitted anything? Do you disagree with any of the barriers we have outlined?

Q: What support or incentives would help overcome these barriers?

Exemptions from the permitted development regime do not represent a major barrier to implementing canopies as might be inferred from the consultation. The requirement for planning permission is an appropriate mechanism to ensure consideration of issues such as impacts on the historic environment. Local Planning Authorities have a key role in supporting the sustainable delivery of canopies by providing greater clarity through local plan design policies, design codes and guides, guidance in conservation area appraisals and use of streamlining tools such as Local Development Orders.

Section 5: Exemptions

Q: Should any additional categories of car parks be exempt (e.g. based on size, location, unsuitability, physical state or usage)? Your answer may refer to existing and/or new car parks.

Q: Do you think any policy to mandate solar installation should apply to existing car parks or only new car parks? Do you think residential and/or multi-storey should be exempt? [Yes, No, Don't know, Please provide any evidence to support your answer]

The consultation document recognises that conservation areas and other sensitive landscapes may warrant exemption. We agree with this. Whilst supportive of the related permitted development right, in our 2023 response to its proposed implementation we raised that the construction of canopies must consider potential impacts on: ⁴

- The character and appearance of historic areas from the introduction of small-scale infrastructure which might be of an incongruous form and/or materials.
- Buried archaeological remains through groundworks, e.g. foundations and cabling.
- Designated assets and their setting from the physical unit and associated glare.
- The open nature and archaeological interest of other protected historic areas, such as Registered Parks and Gardens and Registered Battlefields.

Mandating of canopies should exclude designated heritage assets to ensure local planning authorities can appropriately balance considerations, secure appropriate siting and design, and

³ Planning (Listed Buildings and Conservation Areas) Act 1990 s.72

⁴Permitted Development Rights: Supporting Temporary Recreational Campsites, Renewable Energy and Film Making - Questions 25-27



consider alternative delivery options if necessary.⁵ Mandatory implementation in historic areas may lead to undue pressure that is unsustainable in planning terms.

Conclusion

Whilst in many cases it may be possible for canopies to be successfully designed and integrated into historic areas, with the benefits outlined in the consultation; there may be instances where this is not possible. We therefore think they should not be mandated for in historic areas or where there is the possibility of an adverse impact on the historic environment. Whilst we recognise the benefits that solar canopies can provide and the need to achieve net zero, proportionate oversight should be maintained in historic areas to ensure they are delivered sustainably, guided through local design and policy frameworks.

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⁵ Relevant assets include listed buildings and their curtilage, conservation areas, world heritage sites, registered parks and gardens, registered battlefields, scheduled monuments