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Enq:
Tel No:020 7974 4550
E-mail: gabriel.berry-khan@camden.gov.uk

Supporting Communities
London Borough of Camden
Property & Contracts
3rd floor, 5PS
c/o Town Hall, Judd Street
London WC1H 9JE

Tony Young
London Borough of Camden
Development Management – Regeneration & Planning
2nd floor, 5PS c/o Town Hall, Judd Street
London
WC1H 9JE

Dear Tony

Re: Application for retention of solar panels at Eleanor Palmer Primary School

Further to previous discussions, I hereby enclose a form and supporting documents in respect of the above planning application.

Summary
This application is in respect of the completed Building Works above namely 115 solar photovoltaic (PV) panels installed on three roofs at the school: Roof 1 – south east facing, Roof 2 - south east facing, and Roof 3 - south west facing. The PV systems were designed and installed in such a way as to minimise visual impacts. No change of use was involved.
The installation possesses the environmental and other benefits recorded below, which were the original purpose and intent behind installing the panels. The estimated annual electricity generation is 26,530 kilowatt hours.

Details of installation
The system installed on Roof 1 – south east facing – comprises 40 panels covering an area of up to 68.34 m2. The panels are positioned centrally on the roof in the horizontal sense and towards the top of the roof in the vertical sense.
The system installed on Roof 2 – south east facing – comprises 40 panels covering an area of up to 67.32 m2. The panels are positioned centrally on the roof in the horizontal sense and towards the top of the roof in the vertical sense.

The system installed on the roof of Roof 3 – south west facing – comprises approximately 35 panels covering an area of up to 67.32m2. The panels are positioned centrally on the roof in the horizontal sense and towards the top of the roof in the vertical sense.

In all cases the panels are mounted on a pitched roof mounting system, angled at a pitch the same as the existing roof surface to gain maximum natural light exposure, whilst ensuring the panels project no more than 200mm from the roof slope.

The total installed renewable generation capacity is 29.90 kilowatts peak.

Environmental and other benefits
The panels are linked to both the school building and the national grid, with approximately half the energy generated used on site, and half sold back to the energy supplier.

The Feed In Tariffs and on-site electricity savings as received directly by the School will help fund and enhance educational services. The installation also affords the School a live, on-site resource to support learning in the areas of science, geography and sustainable development, in keeping with the institution's Teaching School and Eco School statuses.

The direct estimated environmental benefit is displacement of a minimum of 11.4 tonnes carbon dioxide equivalent emissions annually.

Design considerations
In accordance with principles of good non-domestic solar planning design, the selected siting minimises the effect of the solar panels on the external appearance of the building and the amenity of the area. These particular roofs were selected due to their discreet location on the site and their orientation in relation to south east and south west to optimise energy yield, along with the lack of trees and structures overshadowing the roof area.

In all cases each module measures 1650x992x35mm and the modules are Microgeneration Certification Scheme (MCS) approved and are glass fronted with an aluminium frame.

The anticipated lifetime of the solar PV systems is 20 years from installation. If no longer needed the systems will be removed as soon as is reasonably practicable.

Although this is a planning application which stands in its own right and is separate from the requirements of a lawful development application, I feel it is worth noting that in general the installer endeavoured to follow the stated criteria for Permitted Development Rights (PDR) for non-domestic solar pitched-roof installations.

The possible unintentional exceptions to this in outcome are as discussed:

1) Three locations where in each case at least two panels are installed with less than one metre separation to the closest side edge of the immediate roof planes. Hypothetical PDR compliance or otherwise rests on the interpretation of the "external edge of the roof" as denoted by the PDR criteria. This process is complicated by this building's non-standard roof-scape and the absence of a detailed definition of "external edge" at least available in the public domain. On balance I accept that, however minor their impact, these features would have been the least likely to receive approval in respect of lawful development.
2) In each panel array there is a separation of less than one metre between the upper edge of the topmost panels and the tops (ridges) of each host roof. My interpretation is that the ridge is decidedly not an "external edge" within the meaning of the PDR criteria above. My understanding is that this aspect of this installation hypothetically meets the criteria for lawful development.

It is my understanding that the minimum separation distance to external edge for pitched roof installations was not in the original iteration of the PDR criteria when first drafted for consultation – only for flat roofs, as for them it reduces visibility from the ground. I infer that it was later introduced for pitched roofs in respect of reducing gutter overshoot and wind lift, rather than for any aesthetic purposes. As such my view is that it should properly apply only to the lower external edge but I am happy to discuss.

Yours sincerely
Gabriel Berry-Khan, Senior Sustainability Officer (Schools)