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The professional voice of the
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Consultation on Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation

The National Fire Chiefs Council (NFCC) is pleased to respond to the consultation published on 28 February 2023 *Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making consultation*.

NFCC is the professional voice of the UK fire and rescue services (FRSs) and is comprised of a council of UK Chief Fire Officers. This response was put together by NFCC's Protection and Reform Unit (PRU).

NFCC does not believe we are best placed to answer the specific questions of this consultation but there are some concerns around the details within the consultation which are outlined below.

NFCC are generally supportive of the proposals within this consultation and are happy to see that Government is not removing the need for prior approval on all the proposed changes to permitted development within this consultation. We would emphasize that prior approval is a vital tool to enable FRS to risk assess and manage possible incidents within their areas.

The area of this consultation most of concern to NFCC is the section expanding the usage of solar panels.

Permitted development rights for solar equipment on and within the curtilage of domestic and non-domestic buildings.

NFCC hold concerns around issues with standard solar panels given they pose a significant challenge for FRS from an operational perspective. Whilst this consultation is focused on Building Attached Photovoltaics (BAPV), we do hold significant concerns around the

emerging usage of Building-Integrated Photovoltaic (BIPV) panels. We would refer to this CROSS report for further information around these risks: [Fire in roofs containing PV panels | CROSS \(cross-safety.org\)](#).

We are concerned where new technology has been introduced into the built environment by law, perhaps with good intention, but at risk of creating unintended consequences with no guidance to support how it can be integrated safely, or mitigate the potential impact (in event of fire).

BIPV is not a common building scenario which means the approved documents are not applicable and nor are Building Standards 9999/9991. The addition of solar panels are not considered either.

An increase in solar panels may also lead to an exponential increase in associated Battery Energy Storage Systems (BESS) across the built environment and all the issues that brings not only the risks from BESS but the risks from 2nd hand installations, DIY installs, incompetence amongst other risks.

Whilst we understand that this may help people decrease their power bills less from the grid as a way to cope with cost of living and meet net zero targets, NFCC are concerned that Government are making efforts to make it easier to implement these types of technologies into the built environment.

We would also hold concerns that where the permitted development rights extend to flat roofs, that they do not interfere with any fire safety mechanisms such as smoke control systems.

Individuals with protected characteristics

NFCC is pleased that the government is considering the impact of the proposed regulations and guidance on individuals with protected characteristics. Any potential adverse impacts on individuals with protected characteristics must be identified and addressed to ensure that they are not disproportionately affected by the extension of these extensions to permitted development rights.

NFCC do not know of any impacts but would highlight that those with protected characteristics may be less able to evacuate their homes independently or able to understand the impact to their home in the event of a fire incident of these solar panels. We would encourage Government to bear this in mind as they extend permitted development in regards to solar panels to ensure that fire safety and the ability for FRS to respond to that fire incident including having knowledge of these panels on the residence.

Yours sincerely,



Nick Coombe
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Protection Policy and Reform Unit

