



The countryside charity  
Dorset

12th March 2024

## **Dorset CPRE response to Department for Levelling Up, Housing and Communities open consultation on The Future Homes and Buildings Standards: 2023 consultation**

Dorset CPRE's primary remit is to protect and enhance the countryside, but we fully support net zero. We have been actively promoting solar rooftop for some years to fight climate change, particularly as there has been over-reliance on building solar farms to meet solar energy targets. Some farms cause harm to protected landscapes, such as Areas of Outstanding Natural Beauty, heritage assets such as historic churches, and are being built on the best agricultural land which is inappropriate at a time of rocketing food prices. However we are well aware that we still need more solar farms to combat net zero and we support particularly small community funded ones, such as the Dottery Solar Array near Bridport.

The government's 2023 policy paper, Powering Up Britain, was meant to address our slowness in introducing measures to meet Net Zero, but has been criticised for lacking ambition and offering little new money. The government is still prioritising offshore wind power to supply the majority of our renewable energy needs, but is now aiming also for 70GW of solar ground and rooftop capacity, a fivefold increase by 2035, but it is very unclear how this will be funded or implemented. Next year a solar roadmap will be published, but we remain concerned that too much focus will be on greenfield solar, and not enough on rooftop, where the government has belatedly focused.

What can Dorset do, as new offshore wind is less likely to be proposed here and the main contribution will come from solar. Yet we ask why 95% of households and 98% of businesses in Dorset had no roof-mounted solar as of December 2021, although installation has accelerated recently. The answer was first a failure by government and Dorset Council, despite its declared Climate Emergency strategy, to make it mandatory for new developments to fit solar panels on every roof. After much badgering it appears Dorset Council is finally looking at ways it can impose new planning conditions on developers. Other local authorities have already done this. Government policy still focuses primarily on advisory guidelines rather than mandatory conditions.

However we could install solar panels on all new buildings and car parks, as well as existing industrial and commercial rooftops as this could provide up to two thirds of the 70GW national target for solar energy, according to University College London's Energy Institute. Rooftop solar is universally popular and it would enable our towns and cities to play their part and it would reduce strain on the Grid. By 2050 rooftop solar should be able to meet a large part of our solar energy targets if the government can provide some financial support for retrofitting rooftop solar on domestic buildings. If we met solar energy targets solely through ground mounted solar 444,000 acres of our countryside, an area larger than Greater

London, would have to be sacrificed, including much of our most beautiful countryside. Much hinges on the promised government solar road map and our ability to resolve current major grid capacity issues. The Grid is badly regulated, lacks capacity, and needs major reform.

One of the reasons for slow progress on industrial buildings has been issues of building ownership and leasehold arrangements, complex planning processes, as well as roof weight and warranties. High energy prices now mean owners of commercial buildings are looking at rooftop solar wherever they can, especially as installing panels on these properties is so much cheaper than for domestic thanks to scale. Warehouses alone could double the UK's current solar PV capacity of 15GW. The government is at least now consulting on changes to permitted development rights with the aim of simplifying planning processes for large commercial rooftop installations. Retrofitting older buildings will be expensive, although VAT on domestic solar PV was dropped a year ago, but not however on commercial. Another way would be to increase funding of community energy groups, like Sustainable Swanage and Purbeck Energy, who both promote the virtues of solar rooftop as well as facilitate the fitting of panels at discounted prices. This would cost much less than subsidising directly millions of home owners, but so far the government has only promised a miserly £10m fund. More Dorset towns instead should follow Swanage's example.

However praise should be given to Dorset Council for improving the energy efficiency of public buildings in Dorset. £5m of funding came from the EU and £19m from the UK government with solar panels going up on many schools and public buildings.

In conclusion we ask government to make these key changes

- Major reform of the Grid
- A national land use strategy to balance the competing demands for development, energy and infrastructure, food security and nature recovery, including a national solar rooftop target of 60%
- Make Solar panels mandatory for all new buildings, and car parks
- Give more financial support to community energy, provide low-cost loans for both domestic and commercial rooftop solar, as well as insulation.

It is with the above in mind that we provide comments to the consultation focusing on questions (7), (8), (9), (10), and (11).

Please do contact Dorset CPRE if you would like to discuss issues further.

### **Consultation questions**

**Question 1.** Are you responding as / on behalf of (select all that apply):

- Other – Dorset CPRE

Dorset CPRE, the countryside charity, is the local branch of the CPRE – Campaign to Protect Rural England. CPRE has campaigned for almost a century to promote, enhance and protect the countryside for everyone’s benefit, wherever they live. We work with communities, businesses and government to find positive and lasting ways to help the countryside thrive - today and for generations to come.

**Question 2.** If you are responding as a member of the public/a building professional, what region are you responding from?

N/A

**Question 3.** If you are responding as a member of the public, are you a [checklist: private tenant, housing association/local authority housing tenant, private landlord, homeowner]

N/A

**Question 4.** If you are responding on behalf of a business/organisation, what is the name of your business/organisation?

N/A

**Question 5.** If you are responding on behalf of a business/organisation, where is your business/organisation based/registered?

N/A

**Question 6.** When you respond it would be useful if you can confirm whether you are replying as an individual or submitting an official response on behalf of an organisation and include:

- the name of organisation: **Dorset CPRE**
- an address (including post-code): **PO Box 9018, Dorchester, Dorset, DT1 9GY**
- an email address: **info@dorset-cpre.org.uk**
- a contact telephone number: **0333 577 0360**

**Question 7.** Which option for the dwelling notional buildings (for dwellings not connected to heat networks) set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?

- a. Option 1 (higher carbon and bill savings, higher capital cost)

**Question 8.** What are your priorities for the new specification? (select all that apply)

carbon savings

**Question 9.** Which option for the dwelling notional buildings for dwellings connected to heat networks set out in The Future Homes Standard 2025: dwelling notional buildings for consultation do you prefer?

a. Option 1 (higher carbon and bill savings, higher capital cost)

**Question 10.** Which option do you prefer for the proposed non-domestic notional buildings set out in the NCM modelling guide?

a. Option 1

CPRE welcomes the Government recommendation for Option 1 for Solar PV panel coverage equivalent of 40% of the building's foundation area for side-lit spaces and 75% for top-lit spaces.

However, CPRE urges the Government for more ambition and to increase the coverage to a larger proportion of a building's foundation area and for side-lit spaces and for top-lit spaces, where practicable. It is noted on pitched roof space up to 50% of the area usually faces the sun.

**Question 11.** What are your priorities for the new specification?

carbon savings