



The Institute of Acoustics

Response to Permitted Development Rights to support the provision of new homes

Introduction

The Institute of Acoustics (IOA) is the UK's professional body for those working in acoustics, sound, noise and vibration. The IOA has some 3000 members from diverse backgrounds, with engineers, scientists, educators, lawyers, occupational hygienists, architects and environmental health practitioners among their number. This multidisciplinary culture provides a productive environment for cross-fertilisation of ideas and initiatives. The range of interests of members within the world of acoustics is equally wide, embracing such aspects as aerodynamics, architectural acoustics, building acoustics, electroacoustics, engineering dynamics, noise and vibration, hearing, speech, underwater acoustics, together with a variety of environmental aspects.

Many members of the IOA regularly carry out noise impact assessments that contribute to the planning process in Scotland. Therefore, any proposed changes to the Permitted Development Rights dealing with the noise and vibration impact may affect the work of our membership both as consultants assisting developers with their planning applications and as regulators evaluating proposals.

Background

The Scottish Government are consulting on potential measures to simplify planning processes and encourage the provision of new homes in rural areas and town and city centres. The consultation also includes options related to domestic air source heat pumps (ASHP) and heat network connections. It is this latter part that this response is focused on in answer to questions 21 to 25.

The IOA is delighted to provide comments on the proposed changes where it is covered by the expertise and experience of our membership. The Scottish Branch consulted with members and a total of 8 responses were received. This response sets out the summary of those responses.

Total 8 responses from Scottish Branch members.

- 5 responses in total (4 anonymous, 1 provided contact details)
- 3 responses submitted offline

Membership levels were:

2x FIOA (Fellow)

4x MIOA (Member)

2x AMIOA (Associate)

Responses

Q21: Do you consider that the reference in the PDR for domestic air source heat pumps (ASHPs) should be revised to make it clear that the installation must comply with Microgeneration Certification Scheme (MCS) 020 a)?

All respondents replied YES.



Q22: Do you consider that ASHPs installed on domestic properties under PDR should be permitted to be used for heating and cooling but not solely cooling?

7 respondents replied YES, and 1 respondent replied DON'T KNOW.

Q23. Do you consider that the PDR for domestic ASHPs in Scotland should be amended to allow for the installation of up to two ASHPs on a detached dwellinghouse?

The majority of respondents (6) replied YES, noting that it must be based on the updated MCS 020a document and calculation tool, which takes contributions from two ASHPs (up to four in the calculation tool) into account. In addition, the cumulative noise impact of the operation should satisfy the total permitted limit requirement of MCS 020a, which means each unit should be 3dB below the overall target, rather than each unit being allowed to emit the permitted limit.

2 respondents replied NO, stating that cumulative noise with detached houses do not necessarily mean that boundaries to other properties are not within close proximity to other dwellings

Q24: Do you consider that proposals that would result in more than one ASHP being installed on flatted buildings or on terraced or semi-detached properties should continue to be assessed on a case-by-case basis by planning authorities?

All respondents replied YES to this question. The relevant MCS guidance and calculation tool is considered to be too simplistic to provide a comprehensive assessment in instances where dwellings are in close proximity and have complicated arrangements in terms of angle of view, height differences (e.g. flatted buildings built on uneven/sloping terrain), screening etc.”

Q25: Do you consider that any other changes should be made to the existing PDR for the installation of ASHPs in Scotland?

The majority of respondents (7) replied NO to this question, with one respondent saying YES.

The national working group agrees that where an ASHP is attached to or located on a building structure that it should be properly isolated so that vibration does not lead to the ingress of noise inside beyond NR25 inside. It maybe that specialist advice is needed to confirm this is likely to be achieved. Also, that barriers and enclosures can be considered within assessments.

Q26: Do you consider that additional measures should be taken to protect tenants who's landlords blanket switch as 020a as only protects neighbours and not tenants themselves?

The majority of respondents (7) replied YES to this question, with one respondent saying NO. In order to preserve social equity where occupants may not have a say over whether a ASHP is installed or not, additional measures should be taken to protect tenants.

Any other comments

The following individual comments were made by members in response to the consultation:

- “Manufacturers / designers need to be pushed to achieve better noise targets for and provide workable mitigation solutions. Targets should relate to the noisiest part of operation (ie compressors)”
- “it is noticed that vibrations are not part of the review”



The IOA would like to draw attention to the joint IOA and CIEH guidance to members and other interested parties on ASHP, which are under revision, and will apply to all areas of the UK. These can be seen at:

<https://www.ioa.org.uk/publications/briefingnote/heat-pumps-professional-advice-note>

<https://www.ioa.org.uk/publications/briefingnote/heat-pumps-guide-potential-purchasers>

Conclusion

If officials would like to explore further any of the points raised, relevant members of the Institute would be delighted to meet with them.

This response has been prepared by members of the Institute who are experienced practitioners in this area. The response has been approved by representatives delegated by the Institute's Governing Council.

Institute of Acoustics,
Silbury Court,
406 Silbury Boulevard,
Milton Keynes,
MK9 2AF
United Kingdom

Tel: +44 (0) 300 999 9675

Email: ioa@ioa.org.uk

October 2025