

Response ID ANON-JNQR-K972-8

Submitted to Permitted development rights to support provision of new homes
Submitted on 2025-10-27 13:47:18

What are permitted development rights?

Permitted development rights for rural homes

1 Do you consider that the maximum limit in Classes 18B and 22A of five residential units per agricultural unit or forestry building should be changed?

Not Answered

Please explain your answer including (if appropriate) how you consider the limit should change:

No response given. Answered Q21 onwards only.

2 Do you believe the current floor space maximum of 150 square metres in Classes 18B and 22A should be removed or increased?

Not Answered

Please explain how and why:

No response given. Answered Q21 onwards only.

3 Do you believe that small extensions and/or separate buildings should be allowed as part of the conversion of an agricultural or forestry building to residential use under PDR?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

4 Do you consider that any of the current location-based restrictions in relation to Classes 18B and 22A should be removed and if so, which?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

5 Do you consider the prior notification and approval mechanism (including the relevant matters and fee) associated with Classes 18B and 22A should be changed?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

6 Do you consider that PDR should allow the change of use of any other buildings on agricultural/forestry land to residential? If so, to which type(s) of building should the PDR be extended, and why?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

7 Do you consider that the PDR under Classes 18B or 22A should be expanded or revised in any other way?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

8 Do you believe that there should be new PDR for the replacement of agricultural and forestry buildings with new-build homes in particular circumstances? If so, in what circumstances?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

9 Do you believe that there should be new PDR for new-build homes in any particular types of rural areas in particular circumstances? If so, in what types of rural areas and in what circumstances?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

Permitted development rights for town centre living

10 Do you consider that proposals to convert the ground floor or entirety of buildings in town and city centres to residential use should benefit from PDR?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

11 Do you consider that there should be PDR for the change of use of properties above Use Class 1A premises to residential use?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

12 Do you have any comments about the prospect that the PDR would allow a change of use to residential from any existing use?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

13 Do you think PDR for the change of use of properties above Use Class 1A premises to residential use should include any limits on the minimum or maximum floorspace, size and/or number of residential units that can be formed?

Not Answered

Please explain your answer and describe what you think the limits should be, if any:

No response given. Answered Q21 onwards only.

14 What other potential limits, restrictions and exclusions to such PDR should be considered?

Please provide your answers:

No response given. Answered Q21 onwards only.

15 Do you consider that a prior notification and approval mechanism should be required in respect of a PDR for 'town centre living' as discussed in this consultation? If yes, what matters do you consider should potentially be subject to prior approval?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

16 Should any such PDR (permitting the change of use of floors above Use Class 1A premises) also permit certain external alterations of a building to facilitate the conversion to residential use, if so what alterations?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

17 Please provide any other comments regarding the potential options to introduce PDR for 'town centre living' proposals as discussed in this consultation.

Please provide your comments:

No response given. Answered Q21 onwards only.

Other considerations and options

18 Do you consider that any expanded PDR for rural homes (described in this consultation) should be subject to a condition prohibiting the use of the new units for short-term letting?

Not Answered

Please explain your answer.:

No response given. Answered Q21 onwards only.

19 Do you consider that any 'town centre living' PDR (described in this consultation) should be subject to a condition prohibiting the use of the properties for short-term letting?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

20 Do you consider that it would be appropriate to amend PDR for existing dwellinghouses, to allow homeowners to make better use of their existing properties?

Not Answered

Please explain your answer:

No response given. Answered Q21 onwards only.

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

Yes

Please explain your answer:

All agree that this is necessary for clarity to the new MCS revision applies.
See letter response for breakdown from members survey.

22 Do you consider that air source heat pumps (ASHPs) installed on domestic properties under PDR should be permitted to be used for heating and cooling but not solely cooling?

Yes

Please explain your answer:

7 of 8 respondents say yes, including the chair of the national working group on ASHP in the Institute of Acoustics Renewable Energy Advisory Group.

Other considerations and options (continued)

23 Do you consider that the PDR for domestic air source heat pumps (ASHPs) in Scotland should be amended to allow for the installation of up to two ASHPs on a detached dwellinghouse?

Yes

Please explain your answer:

5 of the 7 responses from Scottish Branch members agreed with additional comments in support being "Yes. (Based on the updated MCS 020 a) doc and calculation tool, which takes contributions from two ASHPs (up to four in the calculation tool) into account)." and "No. Cumulative noise Detached houses do not necessarily mean that boundaries to other properties are not within close proximity to other dwellings". The view of the chair of the national working group was Yes – provided the cumulative noise impact of the operation satisfied 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.

24 Do you consider that proposals that would result in more than one air source heat pump (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?

Yes

Please explain your answer:

"Yes. The relevant MCS guidance and calculation tool is 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."

Yes - the chair of the national working group agrees.

25 Do you consider that any other changes should be made to the existing PDR for the installation of air source heat pumps (ASHPs) in Scotland?

Yes

Please explain your answer:

6x YES

1x NO

The chair of the national working group agrees that it should be in order to preserve social equity where occupants may not have a say over whether a ASHP is installed or not.

26 Do you consider that it would be appropriate to have PDR for the installation (and subsequent repair and maintenance) of connections from individual buildings to heat networks?

Not Answered

Please explain your answer:

No response given.

Assessments

27 What are your views on the accuracy and scope of the environmental baseline set out in the environmental report?

Please explain your answer:

No response given.

28 What are your views on the predicted environmental effects of the proposals as set out in the environmental report? Please give details of any additional relevant sources.

Please provide your comments:

No response given

29 What are your views on the assessment of alternatives as set out in the environmental report?

Please provide your views:

No response given

30 What are your views on the proposals for mitigation, enhancement and monitoring of the environmental effects set out in the environmental report?

Please provide your views:

No response given

31 Please provide any comments on the partial Business and Regulatory Impact Assessment (BRIA) and information on the potential business or regulatory impacts of any of the options identified in this consultation.

Please provide your comments:

No response given

32 Are you aware of any examples of how any of the options identified in this consultation may affect, either positively or negatively, those with protected characteristics? If yes, please provide further detail

Please provide details:

No response given

33 Please provide any comments or information on the potential impacts on children's rights and wellbeing of any of the options identified in this consultation

Please provide your comments/information:

No response given

34 Do you have any information or comments on the potential impacts on island communities of any of the options identified in this consultation?

If yes, please provide further detail:

No response given

35 Are you aware of any examples of potential impacts, either positive or negative, that the options identified in this consultation may have on groups or areas at socio-economic disadvantage (such as income, low wealth or area deprivation)? If yes, please provide further detail.

Please provide details:

No response given.

36 Do you agree that a Fairer Scotland Duty assessment is not required in relation to the options set out in this consultation?

Unsure

Please explain your answer:

Other relevant comments to the consultation in relation to ASHP :

"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 chair of the national working group draws attention to the joint IOA and CIEH guidance on ASHP, which are under revision, and will apply to all areas of the UK.

https://www.cieh.org/news/press-releases/2022/cieh-and-ioa-launch-new-heat-pump-briefing-notes/?gad_source=1&gad_campaignid=21519619631&gclid=0AAA

About you

What is your name?

Name:

Peter Rogers Fellow of the Institute of Acoustics and Chair of the ASHP working group of the Renewable Energy Advisory Group

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Institute of Acoustics

Further information about your organisation's response

Please add any additional context:

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.

The chair of the national working group draws attention to the joint IOA and CIEH guidance on ASHP, which are under revision, and will apply to all areas of the UK.

https://www.cieh.org/news/press-releases/2022/cieh-and-ioa-launch-new-heat-pump-briefing-notes/?gad_source=1&gad_campaignid=21519619631&gclid=0AAA

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:

ioa@ioa.org.uk

Where did you hear about this consultation?

Scottish Government website

If other, please say where::

Evaluation

How satisfied were you with this consultation?

Slightly satisfied

Please enter comments here.:

A RIF is not a helpful way to get coherent response in context. We have separately provides a written to the email address provided.

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Neither satisfied nor dissatisfied

Please enter comments here.: