Consultation Response: Changes to Various Permitted Development Rights (DLUHC)

The Heritage Alliance

April 2024

Consultation link:
https://www.gov.uk/government/consultations/changes-to-various-permitted-development-rights-consultation/changes-to-various-permitted-development-rights-consultation

About

The Heritage Alliance is England's largest coalition of independent heritage interests. We unite more than 200 organisations which together have over 7 million members, volunteers, trustees and staff. The vast majority of England's historic environment is owned, managed and cared for by Heritage Alliance members. The Heritage Alliance's specialist Spatial Planning Advocacy Group has fed into this response.

General Points

1. The Heritage Alliance believes that both nationally designated and local heritage is at potential risk from the impact of works that may be allowed under government proposals to extend permitted development rights (PDR). Our heritage is not only important to people and places, but it is irreplaceable, and this is underlined by the National Planning Policy Framework (NPPF para 184) as well as elsewhere in the NPPF:

   > *"These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations."*

2. PDR can be a useful tool to remove the need to apply for planning permission where applications relate to minor or uncontroversial developments or changes associated with an existing development. PDR can also help to remove unnecessary applications for planning permission from the system, reducing burdens on applicants and planning authorities. Where built heritage assets are at risk, the best-practice solution is usually adaptation to a new use which will ensure their long-term sustainability. We are

supportive of this in principle, but conversion needs to be careful and sympathetic to prevent harm outweighing the benefits. Similarly, most negative impacts on archaeological remains - including built structures and buried remains - can be mitigated in a way which will permit most development to go ahead, but only where subject to careful site-specific assessment of impacts which ensure an appropriate mitigation strategy is in place.

3. There remains scope for PDRs to bring about loss or damage to nationally important but undesignated heritage and wider damage to the historic environment generally. In cases where there are known heritage assets, it is usually appropriate to protect these through exemptions from PDR, and even where there are currently no known assets, PDR may need to be subject to general conditions. The historic environment should not be seen as a series of point designations of protected sites such as scheduled monuments or listed buildings or protected areas (World Heritage Sites, Conservation Areas, AONBs, National Parks, and Registered Parks and Gardens or Registered Battlefields) – but as a continuum across England. The Alliance is concerned that insufficient consideration has been given to the protection of heritage assets in this consultation and in the Government's general approach to expanding PDR.

4. We recognise the pressures on the current planning consents system due to inadequate resourcing in local planning authorities, and the difficulties this can cause owners and managers of historic and traditional buildings, and buildings in protected areas. However, increasing the scope of PDRs is not the best means of enabling the delivery of new homes or flexibility for business diversification, and it can result in damage to assets due to a lack of oversight. It is therefore vital that planning decisions that could harm the historic and natural environment are overseen by local decision makers with appropriate expertise and regard for the local impacts.

5. Local Planning Authorities must be supported with ring-fenced investment for archaeological and conservation teams which have experienced a devastating decline, and targeted investment in heritage skills and training to build resilience within LPAs. Hypothecating the increased income from recent rises to planning fees to ensure that LPAs are adequately resourced would improve the efficacy of this system without reducing safeguards by introducing new PDRs.

6. We support the statutory requirement for local authorities to provide historic environment services and Historic Environment Records (a welcome element of the Levelling Up and Regeneration Act), and the interim protection of assets under consideration for designation as further practical steps to prevent unintended damage. We also support the use of prior approvals to provide additional safeguards to any new PDRs. This should include an assessment of the local Historic Environment Record (HER) at an early stage, which will give the applicant assurance about historic environment issues that might affect their proposals, de-risk the application and provide more certainty. The sector is now working to develop the Culture and Heritage Capital approach, which the government should continue to champion to ensure future local and national planning decisions are better informed.

7. **We strongly support the removal of historic buildings from the PDR for demolition, a long-term policy priority for our sector, but we propose a later date of 1948, a date which is well understood and established within planning policy and which would at least extend protection to important unlisted art deco and wartime buildings and structures which provide character, historic value, and amenity to their local areas. We have noted, however, that this does not account for all buildings worthy of protection, and furthermore allowing demolition as part of PDR at all clearly goes against the Government's sustainability and net-zero goals.** We strongly welcome an exemption for historic buildings if PDR for demolition is to be retained, but on a larger scale this is not just an issue of heritage protection, it's also about adaptation and reuse of all buildings. We go into further detail on these points below in relation to Q32.

8. As a priority, the Heritage Alliance supports a full review of Permitted Development Rights in the place of piecemeal amendments to the current system. A full review would ensure the process is delivering quality homes and businesses whilst maintaining vital protections. A full review of PDRs would allow for an assessment of the environmental, social and economic impacts of other PDRs which have not adequately been assessed since their introduction.

Consultation Questions

Householder Development

Q.1 Do you agree that the maximum depth permitted for smaller single-storey rear extensions on detached homes should be increased from 4 metres to 5 metres?

No. The process of negotiation that goes on via planning application is essential to enabling good development, while preventing harmful development. One issue of concern is the need for more affordable housing. Extending PD rights for extensions will just take more smaller dwellings out of the control of the

local planning authorities, and convert them into bigger, less affordable dwellings, which will actively work against addressing the affordable housing issue.

Another concern is the impact upon below ground archaeological remains. This includes sites in close proximity to Scheduled Monuments, but also areas which are known to be of high archaeological potential, for example areas designated as Areas of Archaeological Importance, and other places such as historic town centres where there is a high degree of surviving evidence of past settlements. We believe that sites in such areas should be excluded from this PDR.

Existing PD limitations don't prohibit any of this development, but rather they ensure that such proposals, as planning applications, are considered within the national and local planning policy context, in a site specific manner. Where individual proposals are considered acceptable, planning permission would be granted anyway, often with conditions as appropriate. We have evidence that some applicants are deliberately reducing the size of proposed extensions in order to come under PDR thresholds and thereby avoid archaeological conditions. It is impossible to know what degree of information is lost as a result of this.

Extending the PD right regime also shifts more of the responsibility for monitoring the impact of development on the environment away from the pro-active, rational, negotiated planning process, and on to the retrospective, adversarial and (crucially) under-resourced planning enforcement process. The MHCLG (2020) published report 'Quality standard of homes delivered through change of use permitted development rights' found that homes created through permitted development rights resulted in 'worse quality residential environments' than those that required planning permission. Within Protected Landscapes, where cultural heritage makes up part of the character of natural beauty for which the areas were designated, it is vital that relevant authorities are able to fulfil their statutory duty 'to seek to further the purposes' by assessing such proposals through the planning permission process to ensure that the landscapes, natural beauty and special qualities for which they were designated are adequately conserved and enhanced.

Q.2 Do you agree that the maximum depth permitted for smaller single-storey rear extensions on all other homes that are not detached should be increased from 3 metres to 4 metres?

No. Please see response to Q1.

Q.3 Do you agree that the maximum depth permitted for two-storey rear extensions should be increased from 3 metres to 4 metres?

No. Please see response to Q1.

Q.4 Do you agree that the existing limitation requiring that extensions must be at least 7 metres from the rear boundary of the home should be amended so that it only applies if the adjacent use is residential?

No. New flexibilities to allow change of use from non-residential to residential uses create an increased likelihood that residential properties will be overlooked by converted commercial premises. This may also impact the setting and character of urban areas.

Q.5 Are there any circumstances where it would not be appropriate to allow extensions up to the rear boundary where the adjacent use is non-residential?

Yes. This proposal runs counter to high design standards by encouraging dense building without a proper impact assessment by the local planning authority. Non-residential buildings should also have amenity considerations, which would be appreciated by planning officers with the interests of the community and principles of good planning in mind. This proposal would maximise development and private gain at the expense of public enjoyment of their built environment. Please also see our response to Q1.

Q.6 Do you agree that the existing limitation that the permitted development right does not apply if, as a result of the works, the total area of ground covered by buildings within the curtilage of the house (other than the original house) would exceed 50% of the total area of the curtilage (excluding the ground area of the original house) should be removed?

No. As above, this proposal undermines design standards and local democracy. Developing more than 50% of a curtilage is likely to adversely affect local amenity and will not enhance the character and appearance of developed areas. In historic districts and especially conservation areas, where the impact on character will be more pronounced, it is vital that planning authorities continue to be involved in such decisions. We are also concerned that the extension of this PDR also means that archaeological conditions (which are required by planning permission) would not be met.

Q.7 Should the permitted development right be amended so that where a two-storey rear extension is not visible from the street, the highest part of the alternation can be as high as the highest part of the existing roof (excluding any chimney)?

No. Alterations to ridge lines, especially in traditional terraces, can create an uneven roofscape which affects the amenity of neighbouring properties. It could also result in poorly designed extensions that do not fit with the design or character of the host building or wider landscape or townscape character, resulting in negative impacts and reduced quality of the built environment, especially where this concerns heritage buildings.

In addition, the ambiguous nature of the phrase “not visible from the street” is likely to lead to confusion and inconsistency in its interpretation. It is not clear, and unlikely to be able to be made clear as to how this will be defined.

While there can be circumstances where the extended part of the house may “need” to be higher than the right currently permits, the design of such extensions would need to be given careful extra attention to achieve an appropriate design, for which a full planning application would be better placed to assess.

Q.8 Is the existing requirement for the materials used in any exterior work to be of a similar appearance to the existing exterior of the dwellinghouse fit for purpose?

Yes. Materials are a vital element of design standards. Inconsistency in this regard damages amenity to people using the area, whilst consistency enhances character and beauty. The Government has encouraged the use of Design Codes (including the control of materials) to improve the appearance of our streets, a welcome initiative which runs counter to the deregulation proposed in this measure.

Q.9 Do you agree that permitted development rights should enable the construction of single-storey wrap around L-shaped extensions to homes?

No. This would deviate from current design principles which ensure that extensions are harmonious and do not substantially alter the visual character of the house. Such extensions are likely to adversely affect the amenity of neighbours unless designed well – in these cases local planning authorities are qualified to make the assessment. As stated above, we also cannot support the further relaxation of the existing right in any way which expands the degree of ground disturbance liable to cause adverse archaeological impacts in sensitive areas, without appropriately expanded exclusions for areas of high archaeological sensitivity.

Q.10 Are there any limitations that should apply to a permitted development right for wrap around L-shaped extensions to limit potential impacts?

Yes, as above these should not be part of PDR and should be assessed by planning authorities.

Q.11 Do you have any views on the other existing limitations which apply to the permitted development right under Class A of Part 1 which could be amended to further support householders to undertake extensions and alterations?

The Heritage Alliance does not support further deregulation of the planning consent system through PDR until the government has undertaken a full review of the impact of existing PDR amendments (see General Comments).

Q.12 Do you agree that the existing limitation that any additional roof space created cannot exceed 40 cubic metres (in the case of a terrace house) and 50 cubic metres (in all other cases) should be removed?

No. Roof extensions are more visually intrusive than other types of extension as they can be seen from street level. As above, the LPA should be involved in determining the local impact of such developments.

Q.13 Do you agree that the existing limitation requiring that any enlargement must be set back at least 20 centimetres from the original eaves is amended to only apply where visible from the street, so that enlargements that are not visible from the street can extend up to the original eaves?

No. Roof extensions are highly visible to rear neighbours if not at street level. There should be equal visual standards at the front of properties as at the back.

Q.14 Should the limitation that the highest part of the alteration cannot be higher than the highest part of the original roof be replaced by a limitation that allows the ridge height of the roof to increase by up to 30 centimetres?

No. As above, this proposal will create irregular roof ridge heights detracting from the government initiative to improve design standards, and reducing the ability of planning authorities to protect the visual amenity of neighbourhoods. Assessment of individual applications will still allow such extensions to be permitted where they are appropriate.

Q.15 Do you agree that the permitted development right, Class B of Part 1, should apply to flats?

No. Alterations are much more likely to affect other residents in apartment buildings, so they should be treated differently to ensure the interests of residents do not adversely impact the interests of others.

Q.16 Should the permitted development right be amended so that where an alteration takes place on a roof slope that does not front a highway, it should be able to extend more than 0.15 metres beyond the plane of the roof and if so, what would be a suitable size limit?

The character of areas can be eroded by poorly-planned changes on both front and rear roofs, therefore it is important that qualified planners assess proposals for visual impact. As above, this proposal runs counter to initiatives to enhance design standards and would be likely to reduce the attractiveness and amenity in a neighbourhood.

Q.17 Should the limitation that the highest part of the alteration cannot be higher than the highest part of the original roof be amended so that alterations can be as high as the highest part of the original roof (excluding any chimney)?

No. As above, alterations to ridge lines, especially in traditional terraces, can create an uneven roofscape which affects the amenity of neighbouring properties.

Q.18 Do you agree that bin and bike stores should be permitted in front gardens?

No, but these should be treated positively if they have a neutral or positive impact on the character of the area. However, in some areas of historical significance other arrangements will be necessary in order to protect the character of an area. Design codes could help to mitigate this type of impact on character and appearance in some areas, in future.

Q.19 Do you agree that bin and bike stores should be permitted in front gardens in article 2(3) land (which includes conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites)?

No. The current arrangements ensure that the character and beauty of these sites is maintained, and the proposed changes risk diminishing these special places. There will be design solutions which allow for bin/bike storage in these areas with low visual impact, but this must be assessed by the planning authority.

Q.20 Do you agree that bin and bike stores in front gardens can be no more than 2 metres in width, 1 metre in depth and up to 1.5 metres in height?

No, as above.

Q.21 Are there any other planning matters that should be considered if bin and bike stores were permitted in front gardens?

Yes. If this PD right was granted (or any new PDR in this consultation) a Design Code should be set out by the planning authority to provide guidance on appropriate designs and materials. Examples include those developed by Arnside Silverdale AONB and Cannock Chase AONB.[1]

Q.22 Should the existing limitation that in Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites development situated more than 20 metres from any wall of the dwellinghouse is not permitted if the total area of ground covered by development would exceed 10 square metres be removed?

[1] https://www.arnsidesilverdaleaonb.org.uk/what-we-do/advice/development-plan-document-arnside-silverdale-aonb/
and https://www.cannock-chase.co.uk/wp-content/uploads/2020/07/Cannock-Chase-AONB-Design-Guide-Jul-2020.pdf.

No. These places are protected for very good reason, and the high standards applied to them ensure they are not negatively impacted by poorly thought-out developments. Planning authorities and their conservation teams are experienced in assessing change and it is vital that alterations in protected areas are assessed by such professionals. The Levelling Up and Regeneration Act 2023 sets out a duty on relevant authorities to further the purposes of protected landscapes. The introduction of ancillary curtilage structures, by definition, spread out towards the boundary of a residential property, runs a considerable risk of landscape erosion, both visually and against landscape character. It is important to remember that 'natural beauty' includes cultural heritage factors, and settlements may have cultural heritage qualities, contributing to the natural beauty of the area (see Natural England's Designation Criteria, 2011)

Q.23 Should the permitted development right be amended so that it does not apply where the dwellinghouse or land within its curtilage is designated as a scheduled monument?

Yes. Such developments can be damaging to scheduled monuments. However, the boundaries of scheduled monuments can be vague, and the archaeological importance of the site often extends well beyond any formally identified boundary. We would therefore suggest this exemption also applies to land immediately adjacent to a scheduled monument, and to the five areas of archaeological importance in town centres listed in the Ancient Monuments Act. The scheduled monument and its protected area form a designated heritage asset, and 'great weight' should be given to its conservation (see the National Planning Policy Framework, paragraph 205). Such a blanket freedom would inevitably result in the erosion of the scheduled monument. With existing planning controls in place, the LPA can determine the merits and follow the principles that guide applications affecting a heritage asset (also see the NPPF at paragraph 203).

It is also important to note that PDR is problematic for the effective management of heritage assets of archaeological interest as not all nationally important assets of this type are designated but rather are managed through the planning process, so if planning permission is not required there is an increased risk of such assets being adversely affected.

Q.24 Do you think that any of the proposed changes in relation to the Class A, B C and E of Part 1 permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Yes. The proposed changes are likely to impact on all of the above, but these impacts have not yet been assessed for any previous expansion of PDRs. The Heritage Alliance does not support further deregulation of the planning consent system through PDR until the government has undertaken a full review of the impact of existing PDR amendments (see General Comments). We note that the deregulation of developments related to extensions are unlikely to have a positive impact on communities through the development of new homes as they will enable the expansion of existing homes, not the creation of new ones.

Building Upwards

Q.25 Do you agree that the limitation restricting upwards extensions on buildings built before 1 July 1948 should be removed entirely or amended to an alternative date (e.g. 1930)?

No. Historic buildings are not only those which are listed; many 20th century buildings are historically significant and contribute visual amenity to their areas. Historic England polling has consistently shown that an overwhelming proportion of the public value historic buildings and support their protection.[2] A later date prevents the intense densification of urban centres which are more likely to contain historic buildings. It is also important to note that the foundations of traditional buildings can be very shallow, meaning building upwards is not necessarily stable or safe and should be assessed by a conservation specialist within a planning authority. Further, upward extensions are particularly visually intrusive and alter the character of a building, so historic buildings in particular should not be altered without consulting planning authorities.

The current date of 1 July 1948 is well understood and established within planning policy, by utilising different dates across different rights in the planning system, government risks creating further uncertainty and additional complexity, which seem anathema to their goals for the planning system.

Q.26 Do you think that the prior approvals for the building upwards permitted development rights could be streamlined or simplified?

Q.27 Do you have any views on the operation of the permitted development right that allows for the construction of new dwelling houses on a freestanding block of flats (Class A of Part 20)?

Q.28 Do you agree that the existing limitations associated with the permitted development right for building upwards on a freestanding block of flats (Class A of Part 20) incorporates sufficient mitigation to limit impacts on leaseholders?

Q.29 Do you think that any of the proposed changes in relation to the Class AA of Part 1 and Class A, AA, AB, AC and AD of Part 20 permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Yes. The proposed changes are likely to impact on all of the above, but these impacts have not yet been assessed for any previous expansion of PDRs. The Heritage Alliance does not support further deregulation

[2] Heritage Counts, 2023

of the planning consent system through PDR until the government has undertaken a full review of the impact of existing PDR amendments (see General Comments).

Demolition and Rebuild

Q.30 Do you agree that the limitation restricting the permitted development right to buildings built on or after 31 December 1989 should be removed?

No. Facilitating the demolition and rebuild of structures without considering environmental impact clearly goes against the Government's sustainability and net-zero goals. This PDR ignores circular economy principles and the wealth of evidence which demonstrates that retrofitting or renovating existing buildings is almost always less carbon intensive than rebuilding them.[3] Extending this PDR to very modern buildings which are less than 35 years old encourages a disposable approach to the built environment, rather than prioritising long term sustainability and reuse. On a practical note, a building cannot 'benefit' from a measure which enables its demolition rather than its renovation or adaptation.

Q.31 If the permitted development right is amended to allow newer buildings to be demolished, are there any other matters that should be considered?

Yes, as above.

Q.32 Do you agree that the permitted development right should be amended to introduce a limit on the maximum age of the original building that can be demolished?

Yes, it should apply to buildings built before an alternative date than proposed. From a heritage perspective, a cut-off date for this PDR (e.g. 1 July 1948) would help ensure that the impact on many historic buildings was subject to more careful assessment. However, there is no specific date at which buildings become 'historic'. A date of 1948 rather than 1930 would at least extend protection to important unlisted art deco and wartime buildings and structures which provide character, historic value, and amenity to their local areas. It would not, however, protect important later buildings from destruction such as the Ringway Centre in Birmingham or Bastion House in London, both of which the 20th Century Society are campaigning to protect. Nor would it protect locally listed later 20th century buildings which have been identified as significant to their area.

Furthermore, facilitating the demolition and rebuild of structures without considering environmental impact clearly goes against the Government's sustainability and net-zero goals. We strongly welcome an

[3] Historic England, 2020

exemption for historic buildings, but on a larger scale this is not just an issue of heritage protection, it's also about adaptation and reuse of all buildings. Allowing very modern buildings to be demolished in the same breath as protecting old ones is not a 'win' in sustainability terms. This PDR ignores circular economy principles and the wealth of evidence which demonstrates that retrofitting or renovating existing buildings is almost always less carbon intensive than rebuilding them. In some cases, demolition is justified, but the planning system and LPAs exist to carry out those assessments.

As we have set out above, 1 July 1948 is already a well-established date in legislation, policy and practice and would be far more suitable for use in this case. The introduction of different dates across different PDRs creates confusion and complexity in the planning system, which is completely at odds with the Government's aim of clarity and consistency for all those who engage with it.

Q.33 Do you agree that the Class ZA rebuild footprint for buildings that were originally in use as offices, research and development and industrial processes should be allowed to benefit from the Class A, Part 7 permitted development right at the time of redevelopment only?

Q.34 Do you think that prior approvals for the demolition and rebuild permitted development right could be streamlined or simplified?

Q.35 Do you think that any of the proposed changes in relation to the Class ZA of Part 20 permitted development rights could impact on: a) businesses b) local planning authorities c) communities?

Yes. The proposed changes are likely to impact on all of the above, but these impacts have not yet been assessed for any previous expansion of PDRs. The Heritage Alliance does not support further deregulation of the planning consent system through PDR until the government has undertaken a full review of the impact of existing PDR amendments (see General Comments). Demolition PDR in particular should be the subject of a detailed review which includes consideration of their environmental impacts and examine how these policies could encourage unsustainable development.

EV Charging

Q.36 Do you agree that the limitation that wall-mounted outlets for EV charging cannot face onto and be within 2 metres of a highway should be removed?

Q.37 Do you agree that the limitation that electrical upstands for EV charging cannot be within 2 metres of a highway should be removed?

Q.38 Do you agree that the maximum height of electric upstands for EV recharging should be increased from 2.3 metres to 2.7 metres where they would be installed in cases not within the curtilage of a dwellinghouse or a block of flats?

Q.39 Do you agree that permitted development rights should allow for the installation of a unit for equipment housing or storage cabinets needed to support non-domestic upstands for EV recharging?
This potential right should be exempted on Article 2(3) land, as applies to such structures within the current regime.

Q.40 Do you agree that the permitted development right should allow one unit of equipment housing in a non-domestic car park?

Q.41 Do you agree with the other proposed limitations set out at paragraph 60 for units for equipment housing or storage cabinets, including the size limit of up to 29 cubic metres?

Q.42 Do you have any feedback on how permitted development rights can further support the installation of EV charging infrastructure?

Q.43 Do you think that any of the proposed changes in relation to the Class D and E of Part 2 permitted development right could impact on: a) businesses b) local planning authorities c) communities?

Heat Pumps

Q.44 Do you agree that the limitation that an air source heat pump must be at least 1 metre from the property boundary should be removed?

Setting and significance should be a consideration here. Under certain circumstances, the installation of heat pumps provides an opportunity to improve and address harm previously caused to heritage properties through being able to remove oil tanks, gas meters and piping and modern chimneys. In these situations, the siting of a heat pump, which may not be ideal, may provide a significant improvement on the existing situation and therefore be a net benefit to reducing harm to the heritage asset. Current thinking in relation to noise levels, suggests, rather than pure distance, encouraging best practice on orientation and minimising reflecting surfaces will be more effective at minimising noise levels, rather than solely focusing on distance from a boundary.

For protected landscapes this should not be removed. Although relatively small-scale, unfortunate siting of unsightly equipment could result in highly detrimental, albeit localised, impacts on natural beauty. Permitted development rights are currently curtailed in Conservations Areas and World Heritage Sites to

restrict installation on walls that front a highway or if it would be closer to the highway than the house. These restrictions should remain, and the same restrictions should apply in Protected Landscapes.

Q.45 Do you agree that the current volume limit of 0.6 cubic metres for an air source heat pump should be increased?

There needs to be a balance between harm and technical requirements. A concern is that physically smaller ASHPs may have lower capacities and therefore be undersized for the heating demand on the property, or result in increased fan speeds and noise levels, if installers attempt to fit within stricter PDRs.

Q.46 Are there any other matters that should be considered if the size threshold is increased?

Q.47 Do you agree that detached dwelling houses should be permitted to install a maximum of two air source heat pumps?

Q.48 Do you agree that stand-alone blocks of flats should be permitted to install more than one air source heat pump?

Q.49 Do you agree that the permitted development right should be amended so that, where the development would result in more than one air source heat pump on or within the curtilage of a block flats, it is subject to a prior approval with regard to siting?
Yes. Cumulative noise impacts from multiple heat pumps need greater scrutiny, a more area specific background noise level assessment should be required, not a reliance on a single value.

Q.50 Are there any safeguards or specific matters that should be considered if the installation of more than one air source heat pump on or within the curtilage of a block of flats was supported through permitted development rights?

Q.51 Do you have any views on the other existing limitations which apply to this permitted development right that could be amended to further support the deployment of air source heat pumps?

Q.52 Do you think that any of the proposed changes in relation to the Class G of Part 14 permitted development right could impact on: a) businesses b) local planning authorities c) communities?

For further information, please contact The Heritage Alliance.

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