

Response ID ANON-WVH9-Z8HK-K

Submitted to Permitted development rights consultation: changes to support householder development, building upwards, demolition and rebuild, and the installation of electric vehicle charge points and air source heat pumps

Submitted on 2024-04-08 11:58:56

Scope of the consultation

Privacy notice

Personal details

What is your name?

Name:

Damon Hart-Davis

What is your email address?

Email:

d@hd.org

What is the type of organisation that you work for?

Private individual

If applicable, what is the name of your organisation?

Organisation:

What is your position in the organisation?

Position in organisation:

Responding primarily as an individual with a very long-standing interest in this area, eg see my site: <https://www.earth.org.uk/> I am also a PhD student researching UK home heating decarbonisation at the University of Surrey.

Introduction

Changes to the permitted development rights for householder development (Class A, B, C and E of Part 1)

Do you want to complete this section?

Yes

The enlargement, improvement or other alteration to homes (Class A of Part 1)

The enlargement, improvement or other alteration to homes (Class A of Part 1)

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?

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

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

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

The enlargement, improvement or other alteration to homes (Class A of Part 1)

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)?

Not Answered

Please provide your reasons:

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?

No

Please provide your reasons:

It sometimes forces sham expensive (financially and environmentally) make-work such as brick slips. This should be at most a preference, not a rule.

The enlargement, improvement or other alteration to homes (Class A of Part 1)

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

Not Answered

Please provide your reasons:

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

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

Additions to the roof including roof extensions (Class B and C of Part 1)

Additions to the roof including roof extensions (Class B of Part 1)

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?

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

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?

Not Answered

Please provide your reasons:

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

Not Answered

Please provide your reasons:

Other alterations to the roof including roof windows (Class C of Part 1)

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?

Not Answered

Please provide your reasons. If you have answered yes, please provide your alternative suggestion and any supporting evidence.:

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)?

Not Answered

Please provide your reasons.:

Buildings etc incidental to the enjoyment of a dwellinghouse (Class E of Part 1)

Buildings etc incidental to the enjoyment of a dwellinghouse (Class E of Part 1)

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

Yes

Please provide your reasons.:

Supporting active travel and reducing the environmentally-unjustified dominance of private motor vehicles, especially parked for free on public roads, requires measures such as this.

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)?

Yes

Please provide your reasons.:

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

Please provide your reasons.:

On issue is allowing space for larger (eg cargo) bikes, eg for parents to convey children and, eg the weekly shop, and for multiple members of a dwelling to have their own bikes, including those for disabled residents.

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

Not Answered

Please provide your reasons.:

Buildings etc incidental to the enjoyment of a dwellinghouse (Class E of Part 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?

Don't know

Please provide your reasons.:

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?

Don't know

Please provide your reasons.:

Impact assessment

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?

Not Answered

Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination and which right or rights your comments relate to.:

Changes to the permitted development rights for building upwards (Class AA of Part 1 and Class A, AA, AB, AC and AD of Part 20)

Do you want to complete this section?

Yes

The upward extension of buildings (Class AA of Part 1 and Class A, AA, AB, AC and AD of Part 20)

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)?

Not Answered

Please provide your reasons. If you have chosen an alternative date, please specify.:

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

Not Answered

Please provide your reasons. If you have responded yes, please provide your suggestion and justification, and specify which right(s) you are referring to.:

Construction of new dwellinghouses on a freestanding block of flats (Class A of Part 20)

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

Not Answered

Please provide your reasons.:

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?

Not Answered

Please provide your reasons.:

Impact assessment

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?

Not Answered

Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination and which right or rights your comments relate to.:

Changes to the permitted development rights for demolition and rebuild (Class ZA of Part 20)

Do you want to complete this section?

No

Changes to the permitted development rights for the installation of electrical outlets and upstands for recharging electric vehicles (Class D and E of Part 2)

Do you want to complete this section?

Yes

Changes to the permitted development rights for the installation of electrical outlets and upstands for recharging electric vehicles (Class D and E of Part 2)

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?

Yes

Please provide your reasons.:

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?

Yes

Please provide your reasons.:

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?

Yes

Please provide your reasons.:

Changes to the permitted development rights for the installation of electrical outlets and upstands for recharging electric vehicles (Class D and E of Part 2)

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?

Yes

Please provide your reasons.:

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

Yes

Please provide your reasons. If you think that the permitted development right should allow for more than one unit of equipment housing or storage cabinet, please specify a suitable alternative limit and provide any supporting evidence.:

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

Yes

Please provide your reasons.:

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

Not Answered

Please provide your reasons.:

Please ensure that classes of EV smaller than cars are properly supported and considered.

Impact assessment

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?

Not Answered

Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination and which right or rights your comments relate to.:

Changes to the permitted development right for air source heat pumps within the curtilage of domestic buildings (Class G of Part 14)

Do you want to complete this section?

Yes

Changes to the permitted development right for air source heat pumps within the curtilage of domestic buildings (Class G of Part 14)

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?

Yes

Please provide your reasons.:

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

Yes

Please provide your reasons. If you have answered yes, please provide examples of a suitable size threshold, for example, in cubic meters or a height limit, including any supporting evidence.:

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

Not Answered

Please provide your reasons.:

Changes to the permitted development right for air source heat pumps within the curtilage of domestic buildings (Class G of Part 14)

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

Yes

Please provide your reasons.:

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

Yes

Please provide your reasons.:

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?

Don't know

Please provide your reasons.:

This seems to be a hugely complex area and I am not clear if an LA will have the skills or time required.

There could be a further relaxation that any existing heat generator being replaced 1-for-1, where the new generator is no louder than the old one and sited close to the old one's location, should be allowed.

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?

Don't know

Please provide your reasons.:

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?

Yes

Please provide your reasons.:

1) There could be a further relaxation that any existing heat generator being replaced 1-for-1, where the new generator is no louder than the old one and sited close to the old one's location, should be allowed.

2) Allowing climate adaptation by allowing devices that provide cooling, and allowing air-to-air.

Impact assessment

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?

Yes

Please provide your reasons. It would be helpful if you could specify whether your comments relate to a) business, b) local planning authorities, or c) communities, or a combination.:

Especially for frail residents, as the climate warms, it may be critical to their health to allow cooling (or heating and cooling) devices to be installed with a minimum of paperwork and cost.

Public Sector Equality Duty

Q.53 Do you think that the changes proposed in this consultation could give rise to any impacts on people who share a protected characteristic (Age; Disability; Gender Reassignment; Marriage or Civil Partnership; Pregnancy and Maternity; Race; Religion or Belief; Sex; and Sexual Orientation)?

Yes

Please provide your reasons.:

Age, disability, often associated with lower financial resourcesL

1) as the climate warms, allowing cooling to be installed with minimum cost is important (adaptation)

2) ss ~20 million UK domestic gas boilers are replaced with heat pumps, there must be as much flexibility as possible to do so at reasonable cost and minimal red tape.