

Response ID ANON-R3K1-FRYD-P

Submitted to **Proposed programme for reviewing and extending permitted development rights (PDR) in Scotland**

Submitted on **2020-01-28 14:26:30**

The Scottish Government's Proposed Programme for Reviewing and Extending Permitted Development Rights (PDR) in Scotland

1 Do you have any comments on the proposed Work Programme, including the proposed phasing and groupings?

Please provide any comments. :

- We are aware that a flood resilience measures are being considered and may be subject to a separate survey.
- The work stream appears appropriate and if possible Electric Vehicle charging Infrastructure could be brought forward into Phase 1 supporting climate change as the changes are straightforward.

Digital communications infrastructure

- All telecom cabinets and boxes out with conservation areas should be Permitted Development subject to size parameters. There is a need to regularly review size restrictions to accommodate advances and changes in technology. Consideration should be given to reclassifying these as "Critical Infrastructure" such as street lighting and similar urban elements that form part of our streetscape.
- The recently introduced Public consultation non neighbour notification process of Prior Notification which then becomes a planning application should be the subject of a review and careful consideration be given to this element being removed. Critical infrastructure should be given full Permitted Development rights so it can be implemented and remove the current two stage process which would assist with streamlining the planning process.

Agricultural developments

- The change of use of agricultural buildings to residential is not considered to be suitable for Permitted Development and would not be an appropriate mechanism to achieve affordable housing in the countryside. In many cases this would result in the loss of traditional farm buildings to potential inappropriate development. It is considered that the delivery of rural housing is already adequately provided by improved guidance and emphasis on encouraging new housing through LDP policies. Consideration given to rural housing in locations that are subject to local noise contours (i.e. MOD/Airports) to avoid inappropriate development.
- The current Prior notification process should be the subject of a review to assist with streamlining the planning process.

Micro-renewables

- It is considered that more changes can be introduced to assist with the delivery of micro-renewables in terms of increasing their use and making installation easier. Consideration needs to be given to the orientation of buildings and the impact on roofscape. Considerable resources are used to ensure high quality design is incorporated into developments and often this can be eroded when extensive areas are covered in solar panels etc. Further guidance on removal of Permitted Development rights needs to be considered to ensure there is sufficient justification for installation and consideration given to other renewable options which may be more appropriate to ensure prominent roofs are protected.

Peatland restoration

- no comments

Hill tracks

- Needed in certain upland areas where such activity is more intensive and prominent, control still needed to ensure impact is minimised in sensitive areas.

Electric vehicle charging infrastructure

- It would be helpful if this could be moved to the same classification as "Critical Infrastructure" subject to defined size parameters. These again could be considered in the same way as streetlights, bins etc. and not require planning permission unless in a Conservation Area.

Developments relating to active travel

- This theme is welcomed, however consideration should be given to what the actual development is, the associated impact and the level of harm. This maybe an area that would need to go through a planning process.

Town centre changes of use

- This area is worthy of consideration but could potentially undermine some of the main principles of the Development Management process. Consideration would need to be given to identify the potential problems and unintended consequences of allowing a set of uses to change from one to another without planning permission.
- There may also be some conflict with Environmental Health and public health issues along with the recently introduced agent of change principle in the Planning Act as too much residential in town centres will have the potential to drive out some commercial activity through noise complaints etc.
- Policy frameworks within the LDPs could be reviewed to remove restrictive uses which for example, limit other uses in preference to retail.

Householder developments

- This area needs to be reviewed regularly. A balance needs to be achieved and recognise the fact that many developments may be approved unconditionally as an applicant is conforming to the controls in place or other guidance published by a LPA. Personal freedom of choice, community and neighbourly responsibility are issues to consider. The full scale increase of Permitted Development rights can have the potential to create neighbour conflict, impact on mental health and negative wellbeing issues. Many proposals that come forward that are approved have been the subject of pre-application discussion and neighbours have had an opportunity to comment before being formally presented.

District heating and supporting infrastructure & Energy storage

- no comments

Defibrillator cabinet

- The vast majority of these do not have any impact on the street scape and any additions on listed building are controlled through a separate process. Prominent locations in Conservation Areas on traditional buildings are however an important consideration when choosing locations.

Habitat Pond Creation

- This is welcomed and consideration needs to be given to accessing sites and removal of unwanted material.

Allotment and community growing schemes

- Allotments and community growing schemes will need parking areas and control over size and number of outbuildings for each plot needs to be considered.

Snow sports

- This is welcomed but control in sensitive areas would need to be carefully considered.

2 What are your views on the accuracy and scope of the information described in the Sustainability Appraisal report as regards:

a) environmental baseline?:

Generally happy with the accuracy and scope for a, b and c.

b) social baseline?:

c) economic baseline?:

3 What are your views on the predicted effects set out in the Sustainability Appraisal report as regards:

a) environmental effects?:

Generally happy with the predicted effects for a, b and c. Impact of developments on Conservation Areas cumulatively needs to be considered.

b) social effects?:

3c) economic effects:

4 What are your views on the findings and the proposals for mitigation and monitoring of effects set out in the Sustainability Appraisal report with regard to:

Please provide any comments. :

Satisfied with the findings.

Assessment for Bats required in steadings to be converted in terms of addressing environmental matters.

a) environmental baseline?:

b) social baseline?:

c) economic baseline?:

5 Do you have any other comments on the Sustainability Appraisal report?

Please provide any comments. :

Would impact on Developer Obligations sought from each authority in relation to housing.

About you

What is your name?

Name:

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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

Heads of Planning Scotland

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

Publish response only (without name)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Please enter comments here.: