

The Cabinet Office



Isle of Man
Government

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Consultation Summary & Department Responses

Reform of the Planning System - Proposed Amendments to Increased Permitted Development

Date: June 2020

We Asked - The Town & Country Planning Act (1999) sets out a definition of 'development'. Things that fall within this definition must have planning approval before they can be carried out. Planning approval can be via individual planning applications or can be a 'blanket' approval by secondary legislation (aka Permitted Development or PD). The mechanism for the latter is a Development Order produced by the Cabinet Office and approved by Tynwald. The determination of a planning application must take into account all relevant material considerations and must not take into account anything which is not a material consideration.

Development Orders may be appropriate where proposals are unlikely to be contentious or where relevant the material considerations are unlikely to benefit from case-by-case consideration. Where a proposal is contentious due to non-material issues, there is unlikely to be any benefit of case-by-case consideration by way of a planning application as the process cannot legally take into account the non-material issues which make it controversial.

Amendments were proposed to the existing Permitted Development and the principles were the subject of a public consultation as part of the ongoing joint project between the Cabinet Office and the Department of Environment, Food and Agriculture to reform the planning system. However, for the avoidance of doubt, references within this document to the Department refer to the Cabinet Office. The consultation asked for views about a number of proposed amendments to existing Permitted Development rights.

Part 1 of the consultation focussed on minor alterations to existing sites and buildings (outside Conservation Areas) which could help to reduce carbon emissions, including:

- Air Source Heat Pumps;
- Electric Vehicle Charging Points;
- Replacement Conservatory Roofs;
- Solar Panels; and
- Cycle Shelters.

A clarification in relation to household extensions and parking was also proposed.

Part 2 of the consultation proposed amendments to the Change of Use element of the Permitted Development Order including:

- expanding some of the town centre areas which allow change of use between classes (covered by Permitted Development); and
- clarifying the requirements for flats to have at least one window with a reasonable outlook.

You Said - There were 45 responses to the consultation, including 3 Local Authorities (Garff, Port St. Mary and Ramsey), the Manx Wildlife Trust and Manx Utilities. Marown Commissioners confirmed they had no comments.

We Did – This report is a summary of the responses and the issues they raise. It considers questions 5 – 9 of the consultation¹, providing statistical analysis of the answers and common issues. A number of detailed points were raised in relation to the Order, some suggesting changes and some raising concerns. These are set out in Appendix 2.

The draft Order has been updated in light of the above, and will require Tynwald approval before coming into operation.

¹ The first four questions were background as to who the respondent was and whether responses could be published

Appendix 1 – Set Questions

Table 1: Responses

Question	Response	Number	Percentage ²
5: Do you think the proposed changes to Permitted Development Outside Conservation Areas are appropriate?	Yes	33	79
	No	3	7
	Maybe – but I would suggest changes	6	14
	<i>(Not Answered)</i>	<i>(3)</i>	
6: Are there any works which you think should be made Permitted Development which are not currently and are not proposed in this consultation?	Yes	21	49
	No	22	51
	<i>(Not Answered)</i>	<i>(2)</i>	
7: Do you think the proposed changes to the Castletown, Onchan and Port Erin Maps are appropriate?	Yes	27	75
	No	2	6
	Maybe – but I would suggest changes	7	19
	<i>(Not Answered)</i>	<i>(9)</i>	
8: Are there any other changes to any of the 6 maps within the existing order works which you think should be made?	Yes: 4	4	11
	No: 32	32	89
	<i>(Not Answered)</i>	<i>(9)</i>	
9: Do you think the proposed definition for Primary Windows is appropriate?	Yes	26	72
	No	4	11
	Maybe – but I would suggest changes	6	17
	<i>(Not Answered)</i>	<i>(9)</i>	

² This is the percentage of the respondents that answered the question

Appendix 2 – Detailed Points Raised

There were a number of general comments supporting responding to climate change, for example, “We need to allow people to install heat pumps, charge points, solar panels, insulation and other reasonably unobtrusive carbon-reducing additions to their homes without burden on either them or the planning department”. There were some comments that suggested making this PD was acceptable as long as conditions set parameters, but without detailed comment on what they should be (these are not reflected in the table below).

The responses to the yes/no questions and the free-text questions, indicated support for the broad approach. One comment that was noted was that when someone’s boiler fails, they may simply have a replacement fossil-fuel boiler installed so they have a working boiler, than be willing to wait for a planning application for alternative technology.

The current project is intended to focus on a small number of ‘quick-win’ changes to the Permitted Development Order, to reduce unnecessary bureaucracy and facilitate changes to contribute to climate change. This does not preclude separate projects with a different focus taking place.

There were a number of comments suggesting changes which are considered outside the scope of the current project, an which would require more work, but may be worthy of consideration – for example whether there should be more permitted development in Conservation Areas or allowances for habitat creation or afforestation.

These are noted, however given that there was broad support for the changes that were proposed it is considered appropriate to complete the implementation of these, rather than delay this implementation so that the scope of the project can be widened and further changes worked up (and consulted on).

Table 2: Issues Raised by the Consultation and Departmental Response

Issue	Response	Proposed Changes
Overall Approach and cope		
Should we allow for works to flats	The PD (Permitted Development) as drafted provides greater PD within the curtilage of a dwelling house ³ than for flats. Schedule 1 Part 2 relates to operations within the curtilage of a dwelling house (including heat pumps). Part 3 (Miscellaneous) allows for development on buildings other than dwelling houses, including satellite dishes, replacement windows/doors, fences and CCTV. Given the targeted scope of the current order, it is not proposed to allow for ASHP on flats – as it would be more appropriate to consider in the round what permitted development should be allowed for flats, which could be included within the scope of any future review/update of PD.	None
Air Source Heat Pumps		
Have we sufficient safeguards in relation to noise/maintenance?	<p>UK PD states, “The volume of the air source heat pump’s outdoor compressor unit (including housing) must not exceed 0.6 cubic metres”. MU Advised (December 2019) that some ASHPs are covered by an enclosure for visual and environmental reasons - the limit may prevent the ASHP being covered. The consultation document included, “It shall not have a volume of the air source heat pump’s outdoor compressor unit (including housing) exceeding 1 cubic metre”. The UK PD also states, “Development is permitted only if the air source heat pump installation complies with the Microgeneration Certification Scheme Planning Standards (MCS 020) or equivalent standards”. Manx Utilities advised that such a requirement may be overly restrictive as there were limited numbers of installers who would meet this. It is understood that one manufacturer has held several on Island training courses over the years, and Manx Utilities installations are carried out by engineers who have been on this course. It is considered appropriate to add a condition that units only be installed operated and maintained in accordance with manufacturer’s specifications.</p> <p>The consultation document proposed 45dB(A) at the boundary of the property. There have been internal discussions to explore different ways of approaching this, to ensure that we have an appropriate standard which can be implemented/checked. However, the established UK standards as set out in MCS Planning Standards for Permitted Development Installations of Wind Turbines and Air Source Heat Pumps on Domestic Premises (Issue 1.3 - 2019) Table 2 are:</p>	Amend the condition so that it clarifies that the unit shall not result in a noise that exceeds 42 dB (measured as A-weighted and the equivalent continuous sound pressure level over 5 minutes) when measured at 1 metre external to the centre point of any door or window to any neighbouring building as measured perpendicular to the plane of the door or window, with neighbouring building meaning any building which is used as a residential school, a hostel, secure residential accommodation, or for uses which fall within classes 3.1 (Hotels and guest houses), 3.2 (Hospitals, nursing homes and

³ “dwellinghouse” is defined as, “a building occupied for residential purposes other than a building containing one or more flats, or a flat contained within such a building”

Issue	Response	Proposed Changes
	<ul style="list-style-type: none"> • 42dB(A) when measured at 1 metre external to the centre point of any door or window to a habitable room of a neighbouring property as measured perpendicular to the plane of the door or window. • Habitable Room is defined as any room other than a bathroom, shower-room, water closet or kitchen. • Neighbouring property includes dwellings, hotels, residential institutions and houses in multiple occupation (referencing the relevant use classes). <p>It is proposed to have an equivalent standard, although with reference to Manx Use Classes and without reference to Habitable Rooms as there are different definition of habitable room used in other documents (e.g. the Residential Design Guide) and it is not accepted that it is always acceptable for there to be a potential noise disturbance to kitchens, bathrooms etc.</p> <p>The MCS guidance sets out a clear methodology for doing the calculation which could relatively easily be applied, but additional specific Manx guidance could be produced if needed.</p>	<p>residential institutions), 3.3 (dwelling houses), 3.4 (flats), 3.5 (houses in multiple occupation), 3.6 (self-contained self-catering tourist unit) of the Town and Country Planning (Use Classes) Order 2019 but excluding doors and windows to garages, greenhouses poly tunnels, sheds or summerhouses.</p>
<p>Should we allow for multiple installations?</p>	<p>UK PD states, "Only the first installation of an air source heat pump would be permitted development, and only if there is no existing wind turbine on a building or within the curtilage of that property. Additional wind turbines or air source heat pumps at the same property requires an application for planning permission". The consultation document included, "Only one heat pump may be installed on a property - additional air source heat pumps at the same property would require an application for planning permission". In the UK wind turbines are also PD, but that is not the case (or proposed) in IOM.</p>	<p>None</p>
<p>Given potential for noise/vibration should be at least 3m from the boundary</p>	<p>UK PD states, "All parts of the air source heat pump must be at least one metre from the property boundary". Consultation document included, "It must not be sited closer than 1 metre from a boundary of the residential curtilage which abuts another residential property". Consideration was given as to whether this should be applied to any boundary (not just with a residential property) and whether it should be extended to 3 metres. On balance, given other safeguards and practice in UK it is considered 1 metre to the boundary would be appropriate.</p>	<p>Reflect other existing parts of the PDO which state "no part of the structure may be nearer than 1 metre to the boundary".</p>

Issue	Response	Proposed Changes
We should use conditions to prevent visual harm	UK PD states, "air source heat pump must not be installed on a wall if that wall fronts a highway and any part of that wall is above the level of the ground storey" and "the air source heat pump must be sited, so far as is practicable, to minimise its effect on the external appearance of the building and its effect on the amenity of the area". The consultation document stated, "It must not front onto any public highway". The UK point about positioning is a reasonable intention, but it is not considered to be sufficiently clear – and noting the safeguards above are in some cases stronger than England/Wales. It is therefore not included. However, additional safeguard could be that no stand-alone pump may be installed further forward than the dwelling house (to preserve the building line).	Add extra condition to class 14A that says a Stand Alone Unit may not be nearer to the highway than the dwelling
Should we allow pumps that provide for cooling in summer	UK PD states "The air source heat pump must be used solely for heating purposes". The consultation document stated, "It must be used only for heating purposes". It is understood that the restriction regarding the reverse cycle HP is based on the fact that heating in the UK is seen as a necessity, whilst domestic cooling is not a necessity but still uses electricity and therefore produces unnecessary CO2.	None
Heat pump siting appears to be quite restrictive rural properties could have the pump sited close to the highway with no safety concerns.	Similar points were raised in relation to the recent Telecommunications Permitted Development Order, and the potential for more relaxation of planning control in rural areas than urban areas, and as a concept this was considered. The difficulties are there is no clear and widely accepted definition/distinction between rural/urban areas in planning terms, and also that a house in some areas that may be considered rural may still have a neighbouring property quite close. Furthermore, visual impact may be more prominent in relation to alterations to an isolated house.	None
Air Source Heat Pumps should not require building regulation approval just as currently stands for Gas Boilers	Noted – However, it is outside the scope of this project to consider changes to Building Regulations, and so they will continue to be within the remit of Building Control.	None
Charging Points		
Where vehicle not parked off the highway need to avoid cables across pavements	This may be something that DOI Highways could control if causing an obstruction to the pavement. It would be difficult to control people trailing cables across pavements through planning, other than by facilitating alternative provision (i.e. off street parking or charging points within the road/parking).	None

Issue	Response	Proposed Changes
Don't restrict EV charging points as installed by Manx Utilities, rely on MU their standards	It may not be the case the all points will be installed by MU, but in any case the issues that planning considers are not necessarily the same (i.e. more focus on visual impact/wider amenity and less impact on technical operation).	None
There is no need for the restriction on the charging point not being allowed on a wall facing the highway and the restriction should be removed.	The restriction that wall mounted installation is not allowable within 2 metres of the highway if the wall faces onto the highway is intended to protect visual amenity. The restriction of free standing installations being within 2 metres of the highway is intended to prevent pavement overhang of parked vehicles. Installation by public bodies (for examples in public car parks) is not restricted.	None
Electrical charging facilities for other personal transportation devices	It is not clear what changes are being proposed, and depending on the nature/location they may not be development.	None
EV in public car parks/industrial units/government buildings etc.	It is proposed that public bodies could install them. However, on balance it is considered that installation in other locations (such as industrial estates) should still be controlled to ensure that the overall provision of suitable/sufficient parking is maintained. This is, however, something that could be considered in any future review of permitted development.	None
Replacement Conservatory Roofs		
Should be subject to there being an adequate supporting structure.	Building Control cover the stability - A light weight roof can be a suitable replacement, Building Control would require details of the existing structure before allowing any alteration. Building control is interested in the possibility of Disproportionate collapse primarily amongst other items.	None
Replacement Conservatory Roofs - materials/colours should be consistent with the rest of the dwelling	Agreed - this is proposed.	None

Issue	Response	Proposed Changes
Replacement of Conservatory with Solid Room	The response suggested allowing the replacement of walls with solid walls also. We do receive proposals for replacement of Conservatories with solid extensions, although often on a slightly different footprint. The impact of solid walls vs glazing can often be better in terms of avoiding overlooking but can be worse in terms of allowing light/a tunnelling effect on neighbouring properties. On balance it is considered that replacing Conservatory walls with solid walls should not be PD.	None
Cycle Shelters		
Cycle shelters should be allowed even where there is a loss of parking	The consultation proposed cycle shelters within schools subject to various requirements, including that there is no loss of parking. Our understanding of active travel policies through dialog with the Department of Infrastructure is that the creation of a less ideal environment for the private motor car is required to create a modal shift towards active travel adoption. To that end allowing the removal of car spaces for best placement of a cycle shelter would be beneficial.	Do not restrict cycle-shelters where they would result in a loss of parking.
Cycle shelters should be allowed in other locations	This is something that could be considered but may raise wider issues – a cycle shelter in a supermarket car park may raise very different issues to one in an industrial estate, and more detailed work would be required to establish clear parameters for each. On balance it is considered appropriate to exclude these from the current round of changes.	None
Extensions to Dwelling Houses		
Extensions - distance to boundary should be 3m to allow for ladders	Comment is noted, however current distance to boundary of 1 metre is considered to strike the right balance between ensuring room for works and avoiding unnecessary restrictions.	None
Height and footprint restrictions are needed	Class 14 currently includes restrictions (15 square metres floor space and 4 metres in height) which are considered appropriate.	None
PD Class 14 more generous, especially rear extensions - remove max. floor area and allow up to a max. distance from rear of property, depending on type (like UK regs)	Extensions to properties can create a number of issues depending on the nature of the property and the area, beyond the size – positioning of windows can create overlooking issues (particularly where neighbouring houses are lower). The visual impact of an extension also depends not just on its size, but materials and form. On balance it is considered appropriate to retain the existing safeguards.	None
Should be as many parking spaces as bedrooms for extensions	The parking standards are set out in the Strategic Plan and are currently 2 spaces per house irrespective of bedrooms. The proposed approach is intended to allow for extensions where they would not result in a house that currently meets that standard not meeting the	None

Issue	Response	Proposed Changes
	standard, or where a house that doesn't currently meet the standard that there is no net reduction in provision.	
Other Issues that should be made Permitted Development		
Control Paving of Gardens - for flooding and wildlife	DEFA takes the view that in some cases, areas of paving may not constitute development (and so not require planning approval) but where they do constitute development they require approval – this tends to be larger areas and front gardens where parking spaces/access alterations are required. The latter tend to have the potential to create highway safety and visual impact issues (particularly if boundary walls and/or planting is removed) and so warrant consideration by a planning application.	None
Driveway extensions or creating driveways as many properties don't have anywhere to park leading to on road parking.	See above	None
Allow ultra thin double glazing in existing frames in registered buildings	Works to Registered Buildings are controlled under separate secondary legislation and so are outside the scope of this consultation.	None
Replacement windows outside of conservation areas should be permitted development.	Class 38 allows for the installation of replacement windows and doors outside Conservation Areas as long as there is no change to the size/shape/position of the aperture.	None
Double Glazing, Cladding, Insulation etc.	See above in terms of windows. In terms of cladding and insulation, where work does not materially affect the external appearance of a building it may not be considered development and so not require a planning application. Where it is considered development (because it materially affects the external appearance) it is likely to warrant consideration by way of a planning application, as the finish/materials of a building can have an impact in terms of the streetscene/visual amenity.	None
Change windows not in public view to doors (including onto flat roofs/fire escapes)	The creation of access onto flat roofs can sometimes create issues – both in terms of overlooking but also then the need for further works (fencing etc.). It may be that some consideration could be given to widening PD for ground floor rear windows to doors, but that may need further consideration and is outside the scope of this project.	None

Issue	Response	Proposed Changes
Alterations to dormer roofs, as in roof have limited impact, esp. at rear	Poorly designed dormer roofs and windows can often have a negative impact on the streetscene, appearance of a property and can create issues of overlooking. It is considered appropriate to continue control these.	None
Battery Storage (e.g. Powerwalls)	It is understood that some batteries can be installed both internally and externally (the former potentially more efficient and the later as long as there are no extremes in temperature). Internal installation would not constitute development. Depending on size and location it may be that some external installations may also not constitute development. It may be that some consideration could be given to widening PD for external installation of batteries, but that may need further consideration and is outside the scope of this project.	None
Flues and installation of multi fuel stoves better controlled through Building Regulations	It is outside the scope of this project to consider changes to Building Regulations. The installation of flues can have a visual impact depending on location, which may be better controlled through the planning process working in conjunction with Building Regulations.	None
Ground and Water Source Heat Pumps and Hydro systems used for electric, heat or hydrogen generation	Class 23 allows for the installation of ground and water source heat pumps.	None
Wind Turbines	<p>These are 'traditional' horizontal axis, or newer cylindrical vertical axis wind turbines which can vary greatly in size. In some instances, cylindrical turbines can be mounted onto lampposts to power the light. The existing 2012 PDO, Schedule 1, Part 1, Class 12 (Street Furniture) covers lamp standards. If such turbines formed part of the structure and operation of the lamp post it would be covered by the existing PDO.</p> <p>In relation to domestic turbines, there is currently no permitted development. Again referring to the English permitted development, that guidance can be found here for building mounted turbines: https://www.planningportal.co.uk/info/200130/common_projects/57/wind_turbines/2 And here for standalone turbines: https://www.planningportal.co.uk/info/200130/common_projects/57/wind_turbines/3</p>	None

Issue	Response	Proposed Changes
	<p>Cylindrical turbines have a lower visual impact on the street or countryside than what may be regarded as a 'typical' wind turbine in that the blades protrude less. Small cylindrical turbines such as this are not common features on the Isle of Man, and little is known about the potential for growth of this technology on the Island.</p> <p>This option would include the installation of domestic wind turbines in the revised PDO.</p> <p>Pros –</p> <ul style="list-style-type: none"> • Such an addition could encourage the installation of wind turbines, thus reducing the reliance on fossil fuels; • This is currently the case elsewhere in the UK and has been done. <p>Cons –</p> <ul style="list-style-type: none"> • The wind turbines, regardless of their size, are likely to result in a greater visual impact than other amendment options discussed in this paper; • Applications would not be assessed on their individual merits; • The demand for wind turbine systems on a domestic level on the Island is unknown. 	
Other types of properties, not just residential for the EV's, air source heat pumps, conservatory roof replacement, cycle shelters and wind turbines	Issues in relation to apartments, cycle shelters and wind turbines considered. It not considered that replacement of conservatory roofs on non-domestic properties an unlikely occurrence. The current changes to the PD are in part driven by the Manx Utilities trial of domestic Air Source Heat Pump, which has given confidence to progress this. Rolling this out to other properties is something that could be considered in a future review of PD, but it is not considered that there is sufficient information to include this within the current project.	None
Bike locks & storage	There are a number of types of things and locations that this could relate to, giving the same issue/position as with cycle shelters in wider locations.	None
Should be regularly updated list of new technology that is mandatory on new houses	Comment is noted – project does not relate to the principle or overall design of new houses.	None

Issue	Response	Proposed Changes
With a falling population there seems little need for more and more "lego" like housing estates	Comment is noted – project does not relate to the principle or overall design of new houses.	None
Change of use for carbon offsetting such as large scale tree planting;	<p>The emerging climate change work is likely to result in proposals for tree planting and habitat creation/restoration (such as peat-land). Forestry works (including afforestation) by DEFA are excluded from the definition of development (Section 6 of the Act) and so do not require planning approval. PD exists for the afforestation of any land as long as the area of the land, together with any adjoining land being afforested at or about the same time, exceeds 0.5 hectares. Similarly, habitat restoration works may involve engineering operations which may constitute development and require planning approval.</p> <p>The potential for a separate order to address these issues has been raised with the Climate Change team, noting resources/timescales and that these are of a very different nature to the issues set out in the attached consultation document, and so they are outside the scope of the current work package.</p>	None
Other Agricultural on-farm renewable schemes, such as wind turbines, multi EV charge points, bore holes and solar schemes.	Some elements of this considered above. Further work could be undertaken separately in relation to the potential for solar farms etc. Similarly, consideration of when/if boreholes could be PD could potentially be considered in a future review of PD.	None
Changes to Maps		
Amend Ramsey Map to include the whole area of Market Place if possible, it presently excludes the central part of the area.	The comment is noted. The only purpose of the maps is to confirm the areas to which the permitted development as set out in the order applies. That permitted development only relates to allow the change of use of existing buildings. It is understood that the area referred is the car park and as such even if the map were amended, it would have no effect on what could or could not be done under the order. It is therefore not considered necessary or appropriate to amend the map.	None

Issue	Response	Proposed Changes
In the light of current difficulties in Laxey, it may assist to have such boundaries defined in the Village in the future.	The settlements included within the Changes of Use Development Order for 'town centre' changes are those set out within the Strategic Plan Settlement Hierarchy as Main Centre (Douglas) and the 6 Service Centres, which is where the plan directs most development and provision of employment/services. Laxey is the tier below this and is one of the 9 Service Villages. However, Laxey is included within the emerging Area Plan for the East, which will provide an updated policy framework.	None
Should be possible for someone regardless of living in the area to apply for dispensation if suitable and appropriate requirement / reason.	It is not clear what change is proposed here, although see above as to the reason for the settlements included. Outside those areas, planning applications can of course still be submitted as normal.	None
There should be a distinction between restaurants and take away to avoid shops being replaced with more fast food outlets (not good or healthy)	Agreed – the change of use order allows for changes in certain circumstances from a hot food take away to a shop or café, but not the other way around. This is not proposed for change.	None
Any change of use to commercial use should be formally intimated to adjoining neighbours and be subject to regulation	This comment is noted, however Permitted Development is a tool to help balance the need to manage development with the avoidance of unnecessary bureaucracy.	None
Given internet competition high street should be concentrated to avoid gaps	Comment is noted – the approach to drawing the town centre boundaries has been to try to reflect the existing situation 'on the ground' and to provide flexibility for changes between what might normally be considered town centre uses. This in itself should offer some help to avoiding empty shops. Decisions to increase or decrease the town centre and so change land use should be made through the development plan rather than a Permitted Development Order. The changes that are proposed are in response to comments made that the maps as currently set out could more accurately reflect the existing situation.	None

Issue	Response	Proposed Changes
Need to consider parking requirements.	Comment is noted, and this issue was considered when the change of use order was introduced last year. The Strategic Plan sets out parking standards but also indicates they may be relaxed in some circumstances, including central locations with good public transport links. Many of the properties within the town centres do not have dedicated parking. It is not considered that a lack of dedicated parking should prevent the reuse of empty existing commercial premises within town centres.	None
The Onchan proposed area is predominantly residential and converting it to retail on a main arterial route with no parking it not an ideal scenario.	Noted - It has been difficult to produce the boundary for Onchan – concerns were raised as the previous order was finalised (and too late to allow for amendments) that the Onchan boundary should be bigger – which the updated boundary in the consultation document reflects.	None
Why would you exclude the Shoprite stores in Onchan and Port Erin?	The purpose of the Change of Use order is to allow flexibility for the reuse of small-medium premises within existing centres. The change of use of larger buildings/shops warrants consideration through the planning process and as such the maps exclude larger sites and also the wording of the order itself would preclude their change of use even if they were included in the mapped area.	None
Primary Window Definition		
Do we need to include eating/dining facilities? Maybe not necessary.	The inclusion of eating and dining is to give flexibility as to which room/layout will allow for a reasonable outlook, but does not require a flat to have a dining room.	None
A minimum distance between the building and another hard feature, such as a building, should be incorporated to assist in the definition of "reasonable outlook".	It is important that at least one window from a habitable room provides a reasonable outlook to ensure that where part of a building is converted to a flat it offers a suitable standard of accommodation. It has been difficult to produce a definition for this which achieves the desired outcome but can also be clearly expressed in legislation, understood and enforced. Therefore whilst the comment is noted and to some extent agreed with, it is considered that the current approach is the best compromise.	None
Primary window does not need a view of a highway (direction and sunlight is more important)	See above.	None

