

## Response ID ANON-4HSX-FHHT-H

Submitted to Proposals to update the School Premises Regulations  
Submitted on 2026-03-27 17:00:57

### Questions 1-12

1 Do you agree that adding a link to Building Bulletin 93 for Regulation 24 (Acoustic Conditions) adequately covers the requirements for acoustic conditions?

Yes

If not, why not?:

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Members of the IOA regularly work on school design and refurbishment projects in Scotland. Therefore, any proposed changes to the School Premises (General Requirements and Standards) (Scotland) Regulations 1967 with regard to acoustics, may affect the work of our membership both as consultants on the design teams or on when working on the client side evaluating proposals.

The IOA would take this opportunity to emphasise the importance of good acoustics in schools and is overwhelmingly supportive of the recommendation to retain Regulation 24: "Acoustic Conditions" as part of the SPR consultation process. In particular, the IOA welcomes the proposed inclusion of "Building Bulletin 93: Acoustic design of schools - performance standards" under Item 28 of the proposals and as such, wholly supports a weblink to this guidance document be contained within the proposed update of the SPR (in direct response to Question 1 under Regulation 24).

The IOA trusts that the above response in support of the proposals, is met with broad approval and will remain amenable to offering any further commentary or support on this matter, following the closure date of the consultation.

2 Do you agree that Regulation 25 (Water supply) adequately covers the requirements for water supply?

No

If not, why not?:

The IOA cannot comment on this question

3 Do you agree that the new Regulations should apply to grant-aided schools?

Yes

If not, why not?:

4 Do you agree that Regulation 14 (Kitchen Premises) can be retained?

No

If not, why not?:

The IOA cannot comment on this question

5 Should Regulation 20 (Outdoor education and recreational areas) be retained and be updated to require schools to have a mix of outdoor environments to further support the delivery of learning, play, sport and access to nature?

Yes

If not, why not?:

6 Do you agree that if there is a mixture of grass pitches and synthetic pitches then the area required in some circumstances can be less than that currently defined for grass pitches?

Yes

If not, why not?:

7 Do you agree that accommodation metrics is an appropriate method to calculate the educational accommodation required?

No

If not, why not?:

The IOA cannot comment on this question

8 Do you agree that the number of appliances per pupil as set out in Regulation 15 (Sanitary accommodation for pupils) are still appropriate?

No

If not, why not?:

The IOA cannot comment on this question

9 Do you agree that these proposals cover the modern requirements for toilet and washing facilities?

No

If not, why not?:

The IOA cannot comment on this question

10 Do you agree that Regulation 18 (Medical inspection and rest room accommodation) covers the requirements for medical inspection and rest room accommodation?

No

If not, why not?:

The IOA cannot comment on this question

11 Do you agree that wellbeing spaces, including nurture spaces, should be included in the regulations?

Yes

If not, why not?:

12 Do you agree that the updated regulations should include a principle based requirement for digital infrastructure and connectivity in all schools?

Yes

If not, why not? Please provide examples of how digital provision supports educational outcomes in your context.:

Questions: 13-25

13 Do you agree that Regulation 21 (Lighting) covers the requirements for lighting?

Yes

If not, why not?:

14 Do you agree that Regulation 22 (Ventilation) should be retained and updated?

Yes

If not, why not? :

15 Do you agree Regulation 23 (Heating) can be retained and updated?

Yes

If not, why not?:

16 Do you agree that Regulation 4 (General Requirements) can be removed?

No

If not, why not? :

The IOA cannot comment on this question

17 Do you agree that Regulation 7 (Sites for primary and secondary schools) can be removed?

No

If not, why not?:

The IOA cannot comment on this question

18 Do you agree that Regulation 11 (Educational accommodation in schools providing both primary and secondary education) should be removed?

No

If not, why not? :

The IOA cannot comment on this question

19 Do you agree that Regulation 12 (Playroom accommodation in nursery schools and classes) is no longer required and can be removed, and that ELC settings, including those housed within school buildings should be specifically excluded in the updated Regulations?

No

If not, why not?:

20 Do you agree that Regulation 13 (Educational accommodation in special schools) should be removed?

No

If not, why not?:

21 Do you agree that Regulation 16 (Washing accommodation for pupils) is no longer required as it is met within the revised toilets and washing facilities Regulation?

Yes

If not, why not? :

The IOA cannot comment on this question

22 Do you agree that Regulation 17 (Accommodation for staff) can be removed?

No

If not, why not?:

The IOA cannot comment on this question

23 Do you agree that Regulation 19 (Storage accommodation) can be removed?

No

If not, why not?:

The IOA cannot comment on this question

24 Please tell us about any potential equality impacts, either positive or negative, that you consider the proposals in this consultation may have, with reference to the 'protected characteristics' listed. Please be as specific as possible.

Please tell us about any potential equality impacts, either positive or negative, that you consider the proposals in this consultation may have, with reference to the 'protected characteristics' listed above. Please be as specific as possible.:

For the following pupils additional guidance is required:

- with permanent hearing impairment
- with speech, language and communication difficulties
- whose first language is not English
- with visual impairments
- with fluctuating hearing impairments caused by conductive hearing loss
- with attention deficit hyperactivity disorders (ADHD)
- with an auditory processing disorder or difficulty

BB93 states that school senior leaders "...should anticipate the needs of deaf and other disabled children as current and future users of the school".

Equality Act 2010/Disability Discrimination Act states Schools and local authorities have a duty to make 'reasonable adjustments' so that children and young people are not disadvantaged by a long-term disability.

Acoustics of schools: a design guide, has been produced by the Institute of Acoustics and the Association of Noise Consultants to provide supporting guidance and recommendations on the acoustic design of new and refurbished schools. can be found on the IOA website here : <https://tinyurl.com/3v8wfncr>

Chapter 6 of the guide: Acoustic design and equipment for pupils with 'special hearing requirement; states that:

"Favourable acoustic conditions will benefit large numbers of pupils within mainstream schools who have special hearing requirements. These pupils include pupils:

- with permanent hearing impairment
- with speech, language and communication difficulties
- whose first language is not English
- with visual impairments
- with fluctuating hearing impairments caused by conductive hearing loss
- with attention deficit hyperactivity disorders (ADHD)
- with an auditory processing disorder or difficulty

Together, the number of pupils falling into one or more of these categories could conceivably be a significant proportion of every mainstream classroom. It is therefore important to consider every teaching and learning space as being one where there are pupils who have special hearing requirements." (p.63)

BATOD have produced a revised acoustic guidance document sets out the acoustic standards and associated operational guidance intended to support inclusive education for deaf CYP. It is written to be robust enough for reference by acousticians, local authorities, nurseries, schools and college staff, school planners and all who have an interest in the acoustic environment for deaf CYP. The revision replaces all earlier versions and has been written following the national survey carried out by BATOD during 2025. [https://www.batod.org.uk/wp-content/uploads/2026/02/BATOD\\_Acoustics\\_Revised\\_Technical-13022026.pdf](https://www.batod.org.uk/wp-content/uploads/2026/02/BATOD_Acoustics_Revised_Technical-13022026.pdf)

25 Are there any aspects of a child's rights or wellbeing that you think might be affected either positively or negatively by the proposals covered in this consultation?

Are there any aspects of a child's rights or wellbeing that you think might be affected either positively or negatively by the proposals covered in this consultation?:

## About you

What is your name?

Name:

Anne Budd

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

INSTITUTE OF ACOUSTICS

Further information about your organisation's response

Please add any additional context:

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

Publish response with name

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

Yes

What is your email address?

Email:  
anne@newacoustics.co.uk

Where did you hear about this consultation?

Consultation newsletter

If other, please say where::

## Evaluation

How satisfied were you with this consultation?

Slightly dissatisfied

Please enter comments here.:

There is no option to say n/a

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

Very satisfied

Please enter comments here.: