

POLICY NOTE

THE TOWN AND COUNTRY PLANNING (GENERAL PERMITTED DEVELOPMENT) (SCOTLAND) AMENDMENT ORDER 2024

SSI 2024/

The above instrument (“the Order”) was made in exercise of the powers conferred by sections 30, 31 and 275 of the Town and Country Planning (Scotland) Act 1997. The instrument is subject to negative procedure.

The Order amends the Town and Country Planning (General Permitted Development) (Scotland) Order 1992 (“the GPDO”).

The GPDO grants planning permission for specified types of development, meaning development can take place without a planning application having to be submitted to – and granted by – the planning authority. These grants of planning permission under the GPDO are referred to as permitted development rights (“PDR”). PDR are typically subject to specific conditions and limitations to protect amenity and to control the impacts of the development which they permit.

The amendments made by the Order form part of the Scottish Government’s phased programme to review and extend PDR in Scotland. The Order relates to Phase 3 of that review programme.

1. Policy Objectives

1.1. The Scottish Government is carrying out a review of PDR as part of its wider planning reform programme. The review is being taken forward in phases, with each phase considering the potential for new and extended PDR for specific development types. The Order relates to the third phase of the review; the measures it provides for are intended to help support the:

- deployment of domestic and non-domestic renewables equipment.
- alteration/replacement of windows to improve the energy efficiency of buildings.
- roll-out of electricity network infrastructure.

Domestic Renewables

1.2. In view of the cost and climate crises, the changes introduced by the Order provide additional flexibility for homeowners to install a range of domestic microgeneration equipment without a planning application being required.

1.3. Article 4 of the Order amends Classes 2B, 3AA and 3B of Part 1 of Schedule 1 to the GPDO (development within the curtilage of a dwellinghouse). These are essentially consequential changes arising from the introduction of new classes – namely classes 6HA, 6HB, 6HC and 7A. The changes ensure that development carried out under those specified classes are not simultaneously covered under the provisions of classes 2B, 3AA and 3B. The intention is to remove potential uncertainty as to what PDR authorise

particular types of installation. Article 5 serves a similar purpose to article 4 in respect of Part 1ZA of the schedule (development of a building containing a flat).

- 1.4. Article 6 sets out amendments to various classes in Part 1A of the schedule to the GPDO (installation of domestic microgeneration equipment).
- 1.5. Classes 6D and 6E relate to the installation of ground source and water source heat pumps respectively. The Order amends both classes so that the PDR cover associated pipework and other apparatus – in addition to the pump itself.
- 1.6. Article 6(c) substitutes a new Class 6G into the GPDO, which provides PDR for the installation of a free-standing wind turbine within the curtilage of a dwelling. Prior to amendment, Class 6G was subject to a restriction that the wind turbine must be situated at least 100m from the curtilage of another dwelling (regardless of the size of the turbine). This is replaced with a restriction based on the size of the turbine, whereby the turbine must be situated a distance which is less than 110% of the overall height of the turbine from any other dwelling's curtilage. Further provisions limit the maximum height of any turbine to no more than 15m and that the lowest part of any blade must be at least 5m above ground level. Paragraph 2(e) of Class 6G specifies those areas in which the PDR do not apply. Class 6G provides that the turbine is to be installed in accordance with MCS planning standards applicable to domestic wind turbines or an equivalent standard. The turbine mast and blades must be of a uniform colour, free from advertising and free from any external rust, staining or discolouration. Should the turbine no longer be required, or no longer be capable of generating electricity, it must be removed as soon as is reasonably practicable.
- 1.7. Prior to carrying out development under Class 6G, the developer must apply to the relevant planning authority for a determination as to whether the prior approval of the planning authority is required as to the siting, design and external appearance of the proposed turbine. This is a simpler and more streamlined prior approval process than Class 6G was previously subject to.
- 1.8. Article 6(e) of the Order inserts new Classes 6HA, 6HB and 6HC.
- 1.9. New Class 6HA provides PDR specifically for the installation, alteration or replacement of solar panels mounted on a dwelling. Previously such works could have been carried out under the general "1 metre bubble" provisions contained in Class 2B and Class 4A. Neither of those Classes apply in conservation areas. By contrast, new Class 6HA applies to dwellings within conservation areas – allowing solar panels to be attached to houses, flats and buildings containing flats in conservation areas. For dwellings in conservation areas, new Class 6HA does not permit solar panels to be attached to the principal elevation or a side elevation fronting a road. Class 6HA also does not apply to dwellings within the curtilage of a listed building or which are themselves listed – or to dwellings within a World Heritage Site. Solar panels installed under the new class are to be removed as soon as practicable if they are no longer needed or functioning.
- 1.10. New Class 6HB permits the installation of solar panels on a building within the curtilage of a dwelling – henceforth referred to as "outbuildings". The Class provides that solar panels may not protrude more than 500mm from the wall or roof of the

outbuilding they are attached to. The PDR do not apply if the outbuilding is: in the front curtilage of the dwelling; a listed building or in the curtilage of a listed building; or in a World Heritage Site. The panels must be removed as soon as is practicable in the event they are no longer required or operational.

- 1.11. It is possible to install free-standing solar panels within the curtilage of a dwellinghouse under Class 3B of the GPDO. It is also possible to install solar panels on some outbuildings under Class 3A, which covers the alteration, maintenance or improvement of buildings in the curtilage of dwellinghouses – as well as the provision of such outbuildings. However, installations under Class 3A are subject to the restrictions (e.g. on building size, dimensions) set out in the class. Class 3A PDR would not, for example, permit the installation of solar panels on outbuildings where the building exceeds 4 metres in height – or 2.5 metres if within 1 metre of a curtilage boundary. Hence new Class 6HB provides additional flexibility to install solar panels on larger outbuildings.
- 1.12. The Order inserts new Class 6HC which provide PDR for the installation, alteration or replacement of a wind turbine on a detached dwellinghouse. Class 6HC(2) sets out restrictions disapplying the PDR where there would be more than one turbine on the same dwellinghouse and setting limits on the size and location of the turbine. The PDR do not apply in the designated areas listed at Class 6HC(2)(f). Any turbine installed under Class 6HC must comply with the MCS planning standards for wind turbines or equivalent standards, be of a uniform colour and free from advertising, external rust, staining or discolouration, and must be removed as soon as is reasonably practicable in the event it is no longer required or is incapable of producing electricity.

Non-Domestic Renewables

- 1.13. As with the new and extended PDR for domestic microgeneration, the amendments to Part 1B of the GPDO are intended to provide greater flexibility to install renewable energy equipment on – or within the curtilage of – non-domestic buildings, in the light of the current cost and climate crises. The amendments introduced by article 7:
 - Alter the title of Part 1B so that it refers to non-domestic microgeneration "and generation" equipment.
 - Amend PDR for non-domestic ground and water source heat pumps (Class 6I) so that they cover both the pump and associated pipework.
 - Introduce more flexible PDR for solar panels attached to non-domestic buildings (Class 6J).
 - Introduce new PDR (new Class 6N) for free-standing solar panels within the curtilage of non-domestic buildings.
- 1.14. The term "microgeneration" is defined in the Energy Act 2004 and refers to installations with an output capacity that does not exceed: 50 kilowatts in relation to electricity generation and 45 kilowatts thermal in relation to heat production. The Order removes these output limits from Classes 6I and 6J, thereby permitting installations that would not meet the definition of microgeneration. To reflect this, the title of Part 1B of Schedule 1 to the GPDO is amended so that it refers to non-domestic microgeneration "and generation" equipment.

- 1.15. Class 6I is amended such that the PDR cover the pump itself and any associated equipment. Restrictions disapplying the PDR in certain designated areas are removed, as is the restriction on total heat output capacity for the building.
- 1.16. The Order introduces a new version of Class 6J, which provides PDR for the installation, alteration or replacement of solar PV or solar thermal equipment on a non-domestic building. Solar panels installed under new Class 6J may not protrude more than 1m from the surface of the building; this mirrors the “1 metre bubble” provisions contained within Classes 2B, 4A and 6HA (additional limitations apply if the building is in a conservation area). This is considered to be a more straightforward and flexible approach than the previous restrictions that Class 6J was subject to, in terms of the placement of solar panels on the roof and wall of non-domestic buildings. The class does not apply on a listed building or within the curtilage of a listed building, in national scenic areas, historic gardens or designed landscapes, National Parks, World Heritage Sites – or within 3km of an aerodrome or technical site.
- 1.17. New Class 6N is introduced by Article 7, allowing the installation of free standing solar panels within the curtilage of a non-domestic building. The new class restricts the total area of curtilage so used to a maximum of 12 square metres. This can be comprised of a single installation or multiple smaller installations where the cumulative total does not exceed the restriction. Within conservation areas, installations under Class 6N are only permitted in the building’s front curtilage i.e. free-standing solar panels installations in conservation areas must be located to the side or rear of the building in order to benefit from the PDR. The PDR do not apply in national scenic areas, historic gardens or designed landscapes, National Parks, World Heritage Sites, within the curtilage of a listed building – or within 3km of an aerodrome or technical site. Provisions are included in both Class 6J and 6N requiring the removal of the solar panels as soon as reasonably practicable in the event that they are either no longer required or that they are no longer capable of generating electricity or heat.
- 1.18. Class 9M of the GPDO was introduced through Phase 2 of the PDR review programme and came into force on 31 March 2023. It contains PDR for solar canopies, and necessary battery storage and equipment, in qualifying parking areas: that is, off-street parking areas lawfully used for the parking of vehicles and with a hard surface. However, as originally introduced, solar canopies installed under Class 9M had to be primarily used for recharging vehicles i.e. used to power electric vehicle charge points or upstands. Through Phase 3, we sought views on removing the ‘primary use’ criterion so that the PDR would cover solar canopies and necessary battery storage and equipment regardless of the use to which the electricity generated is put. The intention is to make maximum use of qualifying parking areas for the generation of electricity from solar canopies to help meet climate change targets. The majority of responses were supportive of this proposal although some respondents expressed concern that, amongst other things, the additional flexibility could lead to substantive loss of parking. A number of consequential changes to Class 9M have been made to address such concerns and ensure the amended PDR do not undermine the use of parking areas for that purpose.
- 1.19. Article 14 of the Order introduces a new version Class 9M. The more substantive changes in the new Class 9M relate to putting in place limits and controls on the battery storage element. This is to avoid significant loss of parking spaces in light of the

additional flexibility that the new Class 9M affords. New Class 9M(1) separates the grant of planning permission for the solar canopy and related equipment in (1)(a), from that for related battery storage and related equipment in (1)(b). New Class 9M(2)(d) then puts in a cumulative limit of 58 cubic metres on the amount development permitted under (1)(b).

- 1.20. New Class 9M(4) also introduces a prior notification/ prior approval procedure for battery storage and related development under (1)(b) to allow the planning authority to control the design and siting of such development. We are aware that some concerns have been expressed about potential safety issues related to battery storage generally as regards, in particular, fire risks. This provision would allow the planning authority to control, for example, the location of the battery storage at a site or within a site.
- 1.21. In the interpretation section in new Class 9M(5), we have introduced a definition of battery storage, and clarified the definition of ‘solar canopy’, removed the existing requirement that the primary purpose of the solar canopy be for electric vehicle charging, and, to allow for more flexibility of design, specified that its supporting structure need only be open on one or more sides, rather than three.
- 1.22. The condition on the removal of redundant equipment and the restoration of land, now in new Class 9M(3)(a), is consequentially amended to refer to where ‘development is no longer needed for the generation of electricity’, rather than for electric vehicle charging.
- 1.23. The definition of ‘qualifying parking area’ has been amended to clarify that parking areas with soft surfaced areas, such as landscaping, are included, provided vehicles are parked on a hard surface.
- 1.24. The locational limitations on Class 9M PDR in new Class 9M(2)(a), (e) and (f) are retained from the original Class 9M, as are the limitations on height and the size of individual pieces of equipment (including equipment housing) in (2)(b) and (c) and the condition on illumination in (3)(b).

Window Alteration or Replacement

- 1.25. Article 8 of the Order inserts new Class 7A into the GPDO. This provides PDR for the alteration or replacement of windows in both domestic and non-domestic buildings, where the works materially affect the external appearance of the building (and hence constitute development requiring planning permission). Prior to new Class 7A coming into force, replacement windows were permitted by various GPDO classes that relate to the improvement or alteration of particular types of building: Class 2B (dwellinghouses), Class 4A (flats), Class 9A (shops), Class 9C (schools, colleges, universities, hospitals) and Class 9D (offices). In the case of domestic properties, Class 2B and Class 4A do not apply in conservation areas. Classes 9A, 9C and 9D do not apply in a range of designated areas, including conservation areas.
- 1.26. New Class 7A is intended to provide greater flexibility for homeowners and businesses to improve the thermal efficiency of their properties by extending PDR for replacement windows to a wider range of locations and a wider range of building types. In doing so it seeks to strike a balance between cost/climate considerations on the one hand, and heritage considerations on the other. In summary:

- Class 7A permits the alteration or replacement of an existing window – unless it is within a World Heritage Site.
- Within conservation areas, Class 7A:
 - permits the alteration or replacement of a window that is part of the building’s rear or side elevation, unless the side elevation fronts a road.
 - permits the alteration or replacement of a window that is part of the building’s principal elevation (or side elevation that fronts a road) if the window as altered/replaced would be the same or substantially the same as the existing window, as regards the:
 - a) manner in which the window is opened and closed,
 - b) number, orientation and colour of panes comprised in the window, and
 - c) dimensions and colour of the frame of the window or any astragal bars comprised in the window.
 - provides prior notification/prior approval requirements, in respect of the window’s design and external appearance, if:
 - the window is part of the building’s principal elevation (or side elevation that fronts a road), and
 - the window as altered/replaced would not be the same or substantially the same as the existing window in respect of points a) to c) listed above.

1.27. Articles 4, 5, 9, 10 and 11 of the Order make consequential amendments to exclude development covered by new Class 7A from those PDR classes that would, prior to Class 7A coming into force, have permitted the alteration or replacement of windows.

Electricity Network Infrastructure

1.28. Class 40 of the GPDO enables licence holders identified at Section 6(1) of the Electricity Act 1989 to install, improve or replace certain infrastructure needed for electricity undertakings without applying for planning permission. The changes set out in the Order aim to clarify, extend and introduce new PDR at Class 40 so that electricity network infrastructure can be deployed safely and efficiently to support energy generation and meet growing demands for electricity.

1.29. In summary, article 17 of the Order amends class 40 (electricity undertakings) such that:

- The reference to ‘statutory undertakers for the generation, transmission or supply of electricity’ is substituted with a reference to electricity undertakers defined at article 17(6) as the holder of a licence under section 6 of the Electricity Act 1989. This change makes clear that the Class 40 PDR apply to all licence holders identified at section 6 of the Electricity Act 1989 – not just licence holders for the generation, transmission or supply of electricity.
- The maximum size of electricity substations that can be installed or replaced under Class 40 is increased from 29 to 45 cubic metres in capacity (article 17(3)(b)). However, article 17(3)(c) provides that electricity substations that exceed 29 cubic metres in capacity cannot be installed or replaced under Class 40 if they are within 5 metres of a dwelling or within specified areas designated

for their heritage, nature or scenic value. Article 17(3)(c) also introduces a new general restriction on the installation or replacement of electricity substations which would exceed 3 metres in height.

- New PDR are introduced at article 17(2)(b) and (c) for the replacement of electronic communications lines and their supports within a site of special scientific interest or a national scenic area. These PDR are subject to conditions introduced at article 17(4)(a) ensuring that any replacement electronic communications lines should match, or be less visually intrusive than, the original in terms of dimensions, location and volume or supports.
- Per article 17(2)(d), the range of site investigation and survey works that can be undertaken under Class 40 is extended beyond the sinking of boreholes, thereby aligning Class 40 more closely with equivalent provisions for water undertakings (Class 38). These PDR remain subject to the condition at Class 40(3)(c) requiring that the land shall be restored as soon as reasonably practicable upon completion of the development (or within six months from the beginning of the development).
- PDR are introduced at article 17(2)(e) allowing electricity undertakers to erect, construct, maintain, improve or alter a gate, fence, wall or other means of enclosure. These PDR are subject to restrictions introduced at article 17(3)(d) on the construction, maintenance, improvement or alteration of such enclosures which would exceed 3 metres in height. These changes give electricity undertakers flexibility to install gates, fences, walls or other means of enclosure needed to meet the requirements of the Electricity Safety, Quality and Continuity Regulations 2002.
- The definition of ‘operational land’ provided at Class 40(4) is removed by article 17(5) of the Order. This change is intended to prevent confusion and to direct people towards the definition of ‘operational land’ included at Sections 215 and 216 of the Town and Country Planning (Scotland) Act 1997, as amended.
- Per article 17(4)(b), the requirement for prior notification/prior approval in respect of the siting, design and external appearance of proposed buildings erected on ‘operational land’ under Class 40(1)(e) is limited to buildings which would exceed 3m in height. This means that the requirement for prior notification /prior approval in respect of the siting, design and external appearance of proposed buildings erected on ‘operational land’ is removed for building of 3m or less in height.

1.30. It should be noted that consent from Scottish Ministers under Section 37 of the Electricity Act 1989 is required to install, or keep installed, all above ground electric lines subject to certain exemptions. The changes to the class 40 PDR set out in this Order will not impact on the requirement for Section 37 consent.

EU Alignment Consideration

1.31. This instrument is not relevant to the Scottish Government’s policy to maintain alignment with the EU

2. Consultation

- 2.1. The provisions of the Order were the subject of a public consultation¹ which ran from 31 May to 23 August 2023. An independent analysis of the responses to the Phase 3 consultation was published in March 2024². This part of the Policy Note sets out where proposals have not been taken forward or where the provisions of the Order differ substantively from what was consulted on.

Air source heat pumps

- 2.2. The Phase 3 consultation proposed the introduction of additional PDR for domestic air source heat pumps (ASHPs) and new PDR for non-domestic ASHPs. However, the consultation acknowledged potential concerns about noise impacts from ASHPs – in particular cumulative noise where multiple pumps are installed in close proximity. It noted that the UK Government had commissioned research on heat pump noise emissions, and that its findings would be taken into account before any amendments to ASHP PDR in Scotland were finalised.
- 2.3. That research, which was in progress when the Phase 3 consultation was issued, has since been completed and its findings published on 30 November 2023³. In response to the research, a consultation was launched on potential amendments to the UK-wide Microgeneration Certification Scheme standards (MCS-020) that govern the installation of ASHP under PDR, including a noise assessment methodology to ensure emissions do not exceed a specified level. Given that the Scottish ASHP PDR require compliance with MCS-020, it is considered premature to amend the PDR in advance of the standards being updated. However, the Scottish Government remains committed to the principle of extending PDR to support deployment of ASHPs and will look to take forward amendments at the earliest opportunity.

Flues for certain domestic heating systems

- 2.4. The Phase 3 consultation sought views on removing PDR for domestic flues for both wood burning stoves (including log burners) and biomass boilers. This related to concerns about emissions and their impacts as regards both nuisance to neighbouring properties and wider air quality in urban areas.
- 2.5. Responses to the consultation did not indicate additional limitations or conditions to add to these PDR to effectively address nuisance, given the variety of circumstances that might arise in individual cases. There were various concerns about a general removal of these particular PDR, especially regarding the potential impact on rural communities where options for heating may be more limited. Further work is underway to look at how limitations on these PDR could be geographically targeted more effectively to help address the issues of nuisance and air quality.

¹ Permitted Development Rights Review – Phase 3 Consultation: <https://www.gov.scot/publications/scottish-government-review-permitted-development-rights-phase-3-consultation/>

² PDR Review – Phase 3 Consultation Analysis: <https://www.gov.scot/isbn/9781835214541>

³ Department for Energy Security and Net Zero – Research and Analysis – ASHP noise emissions, planning guidance and regulations: <https://www.gov.uk/government/publications/air-source-heat-pump-noise-emissions-planning-guidance-and-regulations>

Non-domestic solar panels

- 2.6. The Phase 3 consultation proposed removing the restriction, previously contained within Class 6J, that solar panels attached to the walls of non-domestic buildings may not be within 200mm of the edge of a wall. This would enable installations to ‘wrap’ around the corners of buildings. The consultation also proposed to allow solar panels to protrude 500mm from the surface of a non-domestic building’s flat roof. In light of consultation responses, the new Class 6J inserted by article 7 of the Order instead contains a “1 metre bubble” provision at 6J(2)(a). This approach is considered a simpler and more flexible way of achieving the policy objective as regards non-domestic solar.

Window alteration or replacement

- 2.7. The PDR provided for by new Class 7A are largely as per the Phase 3 consultation. The consultation proposal was to extend PDR to cover replacement windows in conservation areas – but if the replacement window is situated on the principal elevation or side elevation fronting a road, it would need to match the existing window as regards: its opening mechanism; the dimensions/colour of frames and astragals; and the number, orientation and colour of panes. Through the consultation process, it was pointed out that such an approach could potentially disincentivise the restoration or reinstatement of windows whose design matches the original – but not the existing – window. For example, where an original window has previously been replaced by an unsympathetic design. The inclusion of a prior approval process is intended to provide additional flexibility: it allows non-matching windows on front elevations (and side elevations fronting a road) to fall within the scope of the PDR. For example, if the design is considered by the planning authority to represent an improvement over the existing window.

Electricity Network Infrastructure

- 2.8. The Phase 3 consultation sought views on proposals for clarifying and extending the existing PDR at Class 40 of the GPDO to enable the safe deployment of electricity infrastructure and to build network capacity.
- 2.9. Our proposal to remove the restriction on the PDR at Class 40(1)(b) for the installation or replacement of communications lines greater than 1,000m in length has not been taken forward. A substantial majority of respondents were against making this change citing concerns about potential environmental impacts linked to the deployment of longer communications lines. Communications infrastructure is often embedded into overhead electric lines and, noting the limited requirement for standalone communications lines, we are also unsure about the extent to which this change would meaningfully support the operation of electricity networks.
- 2.10. Certain proposals have also been subject to amendment. Respondents raised concerns about potential visual and heritage impacts of increasing the scale of substations permitted under Class 40 from 29 to 45 cubic metres. In light of this, additional restrictions apply to the installation or replacement of electricity substations with a capacity greater than 29 cubic metres: such larger substations are not permitted within 5 metres of a dwelling or in designated areas of heritage and scenic value.
- 2.11. Respondents also raised concerns about the potential impacts of the proposed removal of prior notification/prior approval requirements that apply to some developments on

operational land under Class 40. In light of this, it was decided to only remove this prior notification requirement for buildings not exceeding 3m in height. This change will provide additional flexibility to upgrade and install structures on operational land, while retaining the controls offered by prior notification/approval for buildings between 3m and 15m in height.

Reverse vending machines

2.12. There are already PDR (Class 9H) for reverse vending machines (RVMs) mounted in shop frontages and free-standing RVMs in the curtilage of shops. To support implementation of the deposit return scheme (DRS), the Phase 3 consultation sought views on extending PDR to cover free-standing RVMs situated on the road. Shortly after the consultation was published it was announced that the launch of Scotland's DRS would be delayed until October 2025 at the earliest. Additional PDR for RVMs are therefore not contained in the Order; further consideration will be given to the need for additional PDR, having regard to the emerging DRS policy and legal framework.

Temporary shooting ranges

2.13. Long-standing PDR (Class 15) permit the temporary use of land and associated moveable structures for any purpose for up to 28 days in a calendar year. Apart from the siting of caravans, this provision – sometimes referred to as the “28-day rule” – can apply to any temporary use. Concerns had been raised with Scottish Government about this provision being used for the development of shooting ranges associated with the use of high calibre weapons and the consequent impact on amenity, particularly as a result of noise.

2.14. The Phase 3 consultation sought views on the principle of excluding temporary target shooting ranges from the scope of the 28-day rule. The consultation attracted a significant level of interest from those strongly opposed to any change in PDR.

2.15. The feedback indicated that excluding temporary shooting ranges from the 28 day rule on a blanket basis could have the unintended consequence of bringing a variety of routine, small-scale works into the scope of the planning application process. It was not considered proportionate to take forward any measures, especially given that shooting is subject to separate licensing requirements – and taking account of other temporary activities that can take place under the 28 day rule or which do not constitute development (for planning purposes). Although the matter will be kept under review, it was decided not to amend the 28 day rule as regards shooting ranges at this time.

3. Impact Assessments

3.1 The following assessments have been carried out and are published alongside this SSI:

- Business and Regulatory Impact Assessment (BRIA)
- Equality Impact Assessment (EqIA)
- Island Communities Impact Assessment (ICIA)
- Children's Rights and Wellbeing Impact Assessment (CRWIA) - screening
- Fairer Scotland Duty - screening

3.2 A Sustainability Appraisal incorporating Strategic Environmental Assessment (SEA) requirements was undertaken and published in November 2019. Through this process, the potential environmental, social and economic effects of the proposed programme of

changes to PDR has been considered. A draft Post Adoption Statement and some additional assessment of Phase 3 proposals that were not considered as part of the 2019 Sustainability Appraisal were published alongside the May-August 2023 consultation. The draft Post Adoption Statement will be updated to reflect the final Phase 3 measures.

4. Financial Effects

- 4.1 A BRIA has been completed and is published alongside this SSI. The BRIA highlights that by removing the need to apply for planning permission for various forms of development, the Phase 3 measures will provide greater certainty for applicants and save time and money associated with preparing a planning application. The BRIA did not quantify these savings.

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