

## **Business and Regulatory Impact Assessment Template**

### **Title of Proposal**

**The Town and Country Planning (General Permitted Development and Use Classes) (Scotland) Amendment Order 2020**

### **Purpose and intended effect**

#### **Background**

Permitted development rights (PDR) refer to those forms of development which are granted planning permission nationally through legislation, meaning they can be undertaken without having to make an application to the planning authority in the usual way. They are, however, sometimes subject to specific conditions and limitations to protect amenity and to control the impacts of the development to which they relate. Current PDR in Scotland are governed by the [Town and Country Planning \(General Permitted Development\) \(Scotland\) Order 1992](#) (“the GPDO”).

In November 2019 we consulted on a proposed work programme for substantially reviewing and extending Permitted Development Rights in Scotland along with the Sustainability Appraisal undertaken by consultants to inform the work. The consultation paper together with responses received are available to view at this link <https://consult.gov.scot/localgovernment-and-communities/reviewing-and-extending-pdr/>.

The Sustainability Appraisal considered the scope for reviewing permitted development rights for 16 separate development types, and provided an assessment of expected benefits that could be realised by extending PDR, as well as any disadvantages.

The Covid-19 pandemic has resulted in our work programme being reprioritised to support our recovery from the pandemic. There are 4 key areas we intend to initially take forward:

- Agriculture
- Digital
- Active Travel
- Peatland Restoration

Changes to Permitted Development Rights for Aquaculture are also being introduced. It was considered that a BRIA was not required to be undertaken for those changes.

#### **Objective**

Extending current PDR or introducing new PDR supports Scotland’s ongoing recovery from the COVID Pandemic

Our proposals seek to boost the Scottish Economy and help to meet our climate change ambitions. They are intended to support the expansion and improvement in Digital Communication, allow residents to erect storage for bikes and other active

travel equipment in front gardens, restore Scotland's vital peatlands and allow for increased agricultural development and diversification, as well as the delivery of new homes (including affordable properties) in rural areas. [+ aquaculture]

## **Rationale for Government intervention**

It is widely acknowledged that the Planning System can play an integral role in achieving all of the outcomes included in the National Performance Framework. The changes we are proposing to bring forward relating to agriculture, digital communications, active travel and peatland restoration can contribute to the specific outcomes of Economy, Environment, Fair Work and Business, Health and Children and Young People.

Removing the requirement for some developments to submit an application for planning permission means that development can be progressed more swiftly, taking advantage of improvements to technology or react to situations.

## **Agriculture**

We propose to:

- Approximately double the size of new agricultural buildings (from 465m<sup>2</sup> to 1,000m<sup>2</sup>) that may be erected under PDR (subject to prior approval) and double of the size of extensions to existing agricultural buildings that may be carried out without prior approval
- Introduce a new PDR for the conversion of agricultural buildings to residential and other commercial uses subject to a number of conditions and limitations, including prior approval in respect of a number of matters
- Make equivalent provision in respect of forestry buildings.

## **Digital Communications**

We propose:

- increases to existing PDR limits for digital infrastructure (e.g. new masts, extensions to existing masts, antenna and other apparatus on buildings, equipment cabinets on the ground and underground development);
- extensions of PD rights into sensitive areas (but subject to lower size/heights limits); and
- to ensure that PDR is compliant with Article 57 of the EU Directive in relation to Small Aerial Wireless Access Points (SAWAP).

## **Active Travel**

We propose to:

- introduce PDR for a storage shed in the front garden of properties – subject to a height and size limit. Aim will be to make it big enough to store 1-2 bikes and/or an adapted bike or mobility scooter

- introduce PDR for a storage shed in the private garden areas of flats, subject to a height and size limit
- introduce PDR for communal storage sheds in the rear garden/backcourt or the car park of shared properties (i.e. flats)
- introduce PDR for communal storage sheds/shelters in the car parks/grounds of offices
- introduce PDR for communal storage sheds/shelters on roads in dense residential areas, near train stations, shopping centres, – subject to height/size limits. Shelters will be subject to the TRO process

## **Peatland Restoration**

We are proposing that PDR relies on a generally accepted understanding of what constitutes peatland, though some peatland restoration operations that are permitted are defined for clarity. Proposals must be notified to the planning authority, who will determine whether certain aspects of the peatland restoration scheme require approval. PDR for access tracks for peatland restoration purposes is explicitly excluded at this stage, but will be considered in a future phase of the programme.

## **Consultation**

### **Within Government**

Discussions were undertaken involving a Virtual Review Group, which consisted of key stakeholders with knowledge and expertise, from scoping stage through to informing an assessment of the sustainability of the options for change.

### **Agriculture**

Proposals were informed by engagement with a number of Directorates within Scottish Government, including relevant policy teams in the Agricultural and Rural Economy Directorate, Transport Scotland, the Directorate for Local Government and Communities, the Directorate for Housing and Social Justice and the Directorate for Environment and Forestry. Prior to public consultation, targeted engagement was carried out with a number of stakeholders including the National Farmers Union Scotland, Scottish Land and Estates, Heads of Planning Scotland, Scottish Environment Protection Agency, Scottish Natural Heritage and Historic Environment Scotland.

### **Digital**

Towards the end of the consultation period on the sustainability appraisal, together with the proposed work programme, an engagement paper was issued to key stakeholders for completion. In July 2020, a targeted pre-consultation engagement paper was circulated to key stakeholders within industry, public sector and environmental bodies and their responses assisted in the preparation of the consultation questions. The consultation paper on digital has been shared with policy leads within Scottish Government's Digital Connectivity team and discussions have taken place with some telecommunications industry stakeholders and Historic Environment Scotland

## **Active Travel**

Discussions on extending permitted development rights for the storage of bikes and other potential works to do with active travel have taken place with Transport Scotland, Sustrans, Cycling UK, NatureScot, Living Streets Scotland and Historic Environment Scotland. Discussions with Sustrans and Transport Scotland have been particularly helpful in considering the different types of bikes and storage solutions which are available such as adaptive bikes, trikes and communal bike storage.

## **Peatland Restoration**

The proposals on permitted development rights for peatland restoration have been discussed with the team promoting peatland restoration within Scottish Government, as well as Scottish Forestry. A discussion paper was circulated in August 2020 to the National Peatland Group, which includes representatives from that team, local authorities, national park authorities, Scotch Whisky Association, Scottish Renewables, Scottish Water, Scottish Land & Estates, RSPB, Community Land Scotland, University of the Highlands & Islands, Scottish Forestry, International Union for Conservation of Nature UK Peatland Project, Buglife, as well as Scottish Environment Protection Agency, Scottish Natural Heritage (SNH) and Historic Environment Scotland. Post-consultation discussions were held with some members of Scottish Environment Link, IUCN UK Peatland Programme and SNH

## **Public Consultation**

As previously indicated, in November 2019 we consulted on a proposed work programme for substantially reviewing and extending Permitted Development Rights in Scotland along with the Sustainability Appraisal undertaken by consultants to inform the work.

The consultation on the proposed changes to Agriculture, Digital Communications, Active Travel and Peatland Restoration was published on 1<sup>st</sup> October 2020 with responses due by 12<sup>th</sup> November 2020. 120 responses were submitted to the consultation from a wide range of stakeholders. An official analysis of the responses has been undertaken and is available at: [insert link].

Targeted engagement was held during the consultation period to allow people the chance to learn more detail about the proposals and to ask questions although there was limited uptake.

The main changes which have been made following the consultation are as outlined below. Annex A outlines the additional engagement undertaken alongside the public consultation.

## **Agricultural Developments**

There is broad support for allowing larger agricultural buildings to be erected and extended under class 18 PDR, although some concerns were raised about possible landscape impacts in sensitive areas. Various concerns were expressed about the proposed new PDR for the conversion of agricultural/ forestry buildings to residential

and commercial uses, which are outlined in the consultation analysis referred to above. In response to the feedback received, a number of changes have been made to the proposals – the key amendments being to provide that:

- The new, larger size limit of 1,000m<sup>2</sup> for agricultural buildings erected or extended under PDR only applies outwith designated areas.
- The new PDR for the conversion of agricultural and forestry buildings only apply to those buildings which were in agricultural/forestry use before 5 November 2019.
- The new PDR for the conversion of agricultural and forestry buildings do not apply in military explosives storage areas or safety hazard areas.
- The new PDR for the conversion of agricultural and forestry buildings to residential use do not apply on croft land.
- The new PDR for the conversion of agricultural and forestry buildings to commercial use is subject to prior notification/approval, irrespective of the scale of conversion.

### **Digital Telecommunication**

There is broad support for increases to PDR for equipment outwith designated areas, but consistent concerns expressed about the potential negative impacts on cultural heritage and the historic environment in sensitive areas. On the other hand the telecommunications industry argue that restrictions on PDR in some circumstances are not necessary and that requirements should be streamlined wherever possible. However, in general, it is accepted by the telecoms industry and heritage interests that a requirement for prior notification/prior approval of certain matters in areas designated for their cultural/built heritage should satisfactorily mitigate these risks and, hence, this forms the basis of many of our proposals.

### **Active Travel Related Developments**

There is strong support for the introduction of PDR for bike storage in a range of different environments. Some concerns expressed about the potential cumulative impacts on the built environment in designated areas and suggestions that a prior notification/prior approval system and/or controls on materials and design may be needed in, for example, conservation areas. On reflection we intend to not impose additional restrictions in designated areas to provide a strong signal of support and a rebalancing of space in the built environment for active travel.

The key changes which have been made to the proposals which we consulted upon are:

- The maximum sizes of the storage sheds to be allowed in front gardens has been increased, taking account of public comment and discussions with EDC and Falco.
- A proposal to restrict the materials to timber in conservation areas has been dropped, taking account of public comment and discussions with Falco.
- The pdr for bike sheds in front gardens will be made subject to the shed not blocking the view of a driver leaving a driveway on the property.
- The pdr for communal bike stores to the rear of flat blocks will be made subject to the store not causing a loss of light to a habitable room.

We have resisted comments made in response to the public consultation from local authorities and some individuals to the effect that:

- storage sheds should not be allowed in front gardens in conservation areas (for reasons of visual amenity) as we have taken the view that the visual impact will be acceptable, given the size restrictions; and
- storage sheds should not be allowed in the private garden areas of flats, as they could block light to a neighbour’s window, as we have taken the view that the sheds would not give rise to issues of loss of light because of the maximum height allowed (1.5 metres).

### **Peatland Restoration**

There is strong support for peatland restoration and, in general, agreement that projects which have been scrutinised and are receiving funding through the Peatland Action programme could enjoy broad PDR. However, support is tempered by widespread concern that any projects that do not rely on approval for funding through the Peatland Action programme or seek verification through the Peatland Code will not be subject to any level of scrutiny if a wide ranging ‘blanket’ PDR is granted. We have therefore decided that a Prior Notification/Prior Approval system (accompanied by guidance for planning authorities and applicants) would help ensure that projects that are not scrutinised through another mechanism can be considered more fully by planning authorities. This was supported by NTS and RSPB who will be carrying out restoration projects themselves. In addition, to address concerns that the introduction of PDR could have unintended consequences for sustainable forest management and the certification of timber where projects involve deforestation/woodland removal (as these will be considered by planning authorities, rather than Scottish Forestry under the felling licence regime) it is proposed to amend the Forestry (Exemptions) (Scotland) 2019 regulations during 2021. The effect of these proposed changes will be to specify that projects involving woodland removal must obtain a felling licence as well as submitting their proposal for Prior Notification/Approval.

### **Business**

Some consultation was undertaken with businesses in advance of the public consultation to help shape our proposals. As indicated above further engagement was undertaken during the public consultation period to help inform our final proposals for change.

### **Options**

Option	
Do Nothing – all classes	No changes would be made to the General Permitted Development Order with current restrictions on development remaining in place.
Option 1 – changes proposed by consultation paper	The General Permitted Development Order would be updated to extend the types of development which will not require the submission of a full application for planning permission.
Option 2 – implement changes which have been	The General Permitted Development Order would be updated to extend the types of development

further refined by the consultation paper	which will not require the submission of a full application for planning permission. The proposals have been influenced in some cases by views expressed during the consultation.
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## **Sectors and groups affected**

Permitted Development Rights mainly affect directly residents, developers, landowners, community groups and planning authorities. Landowners and developers may include individual persons as well as business interests. Where PDR encourage development, then the wider public can also experience any associated benefits and/or any negative impacts of the development itself.

## **Benefits**

Extending PDR will help to improve certainty of outcome for developers, and can help to reduce timescales for securing any necessary permissions or approvals.

By removing more proposals from the planning application process, the proposals will also help free up resources for Planning Authorities. Where prior approval is required, these benefits may be offset in part by the need to submit an application for prior approval.

However, the fee for prior approval would be less than that for an application for planning permission.

Extending PDR could:

- encourage development and improve digital connectivity,
- allow farmers/landowners to erect larger buildings to house machinery or convert existing buildings to residential or commercial uses, allowing them to diversify their current business,
- allow residents to erect containers to store bikes/scooters or other mobility devices, freeing up space within stairwells in tenement properties or within residential properties and improving access to wheeled transport; and
- encourage peatland restoration as a means to offset carbon emissions (and other environmental improvements).

All of this will benefit both businesses and the general public.

## **Agriculture**

Our proposals are intended to support the rural economy and complement wider Scottish Government initiatives to support Scotland's rural economy and promote rural repopulation. Amongst other things, our proposals may help to support succession planning for farms, economic diversification and sustainable communities in rural areas. The proposed PDR are subject to conditions and limitations in order to limit potential harm to local amenity.

For the Active Travel and Agriculture categories the Planning Statistics are not broken down to a level which will provide an accurate picture of how many applications are currently considered and how many applications for full planning permission will be removed by the changes which are being proposed. It may also be the case that the requirement to apply for planning permission currently acts as a deterrent due to cost or complexity, therefore granting permitted development rights may actually encourage people to carry out development.

## **Digital**

The need for improved and effective connectivity has become even more important given the nation's reliability on the use of digital communications in the Covid-19 pandemic, where we have seen significant demand on connectivity for home working, video conferencing, health consultations, public services, on line shopping etc. The benefits of enhanced digital connectivity also result in less travel which contributes significantly towards climate change measures by reducing carbon footprint. By decreasing planning controls in certain areas this will also reduce the burden on planning authorities and, therefore, speed up deployment of such infrastructure.

In 2019-20 there was 261 applications which were for telecommunications infrastructure. Of these it is not clear how many would be removed from the planning application process as a direct result of the proposals.

## **Active Travel Related Developments**

During the Review of the Planning System one of the most popular ideas on our digital forum was for the removal of the need to apply for planning permission to erect a storage unit in which to store bicycles. During the Covid-19 pandemic there has been a significant increase in the number of people cycling with many bike shops being sold out of stock or there being long waiting times to service bikes.

With this increase comes the need to provide safe and secure storage for people when at home and when undertaking errands or commuting. In our recent call for ideas for National Planning Framework 4 a requirement for secure cycle storage was also highlighted. The proposed changes will provide residents, particularly those in flats or who only have access to a garden at the front of their property, with the ability to erect a storage shed in which to store their bicycle removing the need to either carry a bike upstairs or access the rear of the property. This can have an important impact by ensuring that people have easy access to safe and secure storage. This could increase the use of bikes by making it more straightforward to access a bicycle to carry out day to day tasks.

## **Peatland Restoration**

Peatlands cover more than 20% of Scotland's land area. Healthy peat plays a vital role in carbon storage and combating the effects of climate change, and in maintaining Scotland's water quality and rich biodiversity. Peatlands reduce flood risk and support farming and crofting. They are also part of the wild landscapes that attract tourists to Scotland.



Healthy peatlands provide many benefits to us all – but not all of our peatlands are in good health. It is estimated that 80% of Scotland's peatlands are damaged.

There have been limited numbers of applications for planning permission up to now for Peatland Restoration projects, though currently there are in the region of 70 projects started each year. In future the scale and number of projects is expected to rise in line with the target of restoring 20, 000 hectares of peatland per annum. These factors will likely affect the extent to which the question of whether planning permission is required and so, in the absence of permitted development rights, lead to requests for planning applications despite such projects being regarded as having positive impacts and minimal risks.

## **Costs**

It is expected that the proposed changes will result in savings for both planning authorities by removing the need to determine applications and to applicants in them not requiring to pay for the submission of a full planning application.

However, initially, savings may be partially offset by some indirect costs to business in ascertaining whether or not development is permitted development, and in complying with planning enforcement were any work inadvertently carried out which subsequently transpires not to benefit from PDR. However, such costs are anticipated to be minimal and short-term and will naturally fall away as developers become familiar with the changes.

For developments which do not already benefit from permitted development rights an application for planning permission is required to be submitted. The fee for submitting an application for development within the curtilage of a dwellinghouse is currently £202 with most other types of development starting at £401 and increasing on an incremental basis based on the size of the development. Applications for Prior Approval generally attract a fee of £78 although the fee for Telecommunication Masts is £300.

Authorities have highlighted that in some circumstances applications for full planning permission which attracts a fee is being replaced with the prior approval/notification procedure which attracts a lower fee than that for full planning permission. They consider that it may be the case that the prior approval/notification of development can involve resource in excess of the fee which is paid. It should be noted however, that the Scottish Government has previously consulted on increasing planning fees earlier in 2020. The work is currently on hold at the moment, however, it will be restarted in 2021 where this issue can be looked at in the round.

## **Scottish Firms Impact Test**

As indicated we have had discussions with firms/ organisations about our proposals and we have set out how these have contributed to arriving at our final proposals.

## **Competition Assessment**

We do not consider that the proposed changes across the 4 areas of Agriculture, Digital, Active travel or Peatland Restoration will negatively impact on competition. It is considered that the proposed changes will not limit the number or range of suppliers, the ability of suppliers to compete, suppliers' incentives to compete vigorously; or the choices and information available to consumers.

### **Consumer Assessment**

We do not consider that the proposed changes across the 4 areas of Agriculture, Digital, Active travel or Peatland Restoration negatively impact on consumers. It is considered that the proposed changes will not affect the quality, availability or price of any goods or services in a market, affect the essential services market, such as energy or water, involve storage or increased use of consumer data, increase opportunities for unscrupulous suppliers to target consumers, impact the information available to consumers on either goods or services or their rights in relation to these, or affect routes for consumers to seek advice or raise complaints on consumer issues.

### **Test run of business forms**

No new forms will be introduced.

### **Digital Impact Test**

It is considered that the proposed changes will not be impacted by changes to processes brought about by digital transformation by removing the need to apply for planning permission in many instances.

### **Legal Aid Impact Test**

It is considered that the proposed changes will not give rise to increased use of legal processes or create new rights or responsibilities which would impact on the legal aid fund.

### **Enforcement, sanctions and monitoring**

Planning legislation sets out that enforcement is the responsibility of the planning authority in which a breach of planning control has taken place. Scottish Government guidance encourages the informal resolution of alleged breaches of planning control. Where it is established that there has been a breach and informal measures are unsuccessful in resolving the matter, there is a range of formal enforcement powers available to planning authorities.

### **Implementation and delivery plan**

The regulations are proposed to come into force on 1<sup>st</sup> April 2021. At that time additional guidance, advice and information for developers and planning authorities on the interpretation of the revised GPDO will be published where necessary.

## Post-implementation review

As noted in the Post Adoption Statement that accompanies this consultation we will give further consideration to monitoring and set out our proposals following the consultation. This could involve various approaches and combinations of approach, such as liaison with planning authorities, developers and statutory bodies, as well as commissioning research. Subsequent Phases of the PDR programme will consider changes to PDR for other development types.

## Summary and recommendation

Extending the scope of permitted development rights can deliver benefits to both authorities and applicants. By extending the types of development which are granted permitted development rights thus removing the need to submit a full planning application it can free up local authorities to focus on the developments where they can add most value and it can provide applicants with the certainty that they can proceed with development without the cost and delay that submitting and application for planning permission can entail. It is recommended that the proposals to extend permitted development rights are progressed as outlined in the consultation paper.

## Summary costs and benefits table

<b>Option</b>	<b>Total benefit per annum: - economic, environmental, social</b>	<b>Total cost per annum: - economic, environmental, social - policy and administrative</b>
1	Current situation is maintained which is understood by applicants and authorities.	Applications will continue to be processed by planning authorities which will require fees to be paid and delay in implementing any proposals as applications are determined. Failure to progress with our proposals could risk an increase in active travel, the

			restoration of our valuable peatlands, delays the expansion of telecommunication infrastructure and restricts the potential diversification of rural buildings and the safe storage of agricultural machinery.
2	Agriculture	<ul style="list-style-type: none"> <li>• It is not clear how many applications these changes will remove from the system or how many developments will be progressed in response to this change.</li> <li>• These changes will support rural development and diversification by allowing farmers to erect larger agricultural buildings and to convert buildings to residential and other commercial uses</li> </ul>	Over the short term there is potential for uncertainty while parties familiarise themselves with the scope of the new provisions. Guidance should help to overcome such transitional issues.
	Digital	<ul style="list-style-type: none"> <li>• In 2019-20 there was 261 applications which were for telecommunications infrastructure. Of these it is not clear how many would be removed from the planning application process as a direct result of the proposals.</li> <li>• The need for improved and effective connectivity has become even more important given the nation's reliability on the use of digital communications in the Covid-19 pandemic,</li> <li>• The benefits of enhanced digital connectivity also result in less travel which contributes significantly towards climate change measures by reducing carbon footprint.</li> </ul>	Costs will be for projects requiring prior approval for new masts and for

		<ul style="list-style-type: none"> <li>• By decreasing planning controls in certain areas this will also reduce the burden on planning authorities and, therefore, speed up deployment of such infrastructure.</li> </ul>	new PDR in designated areas
Active Travel	<ul style="list-style-type: none"> <li>• It is not clear how many applications these changes will remove from the system or how many developments will be progressed in response to this change.</li> <li>• During the Covid-19 pandemic there has been increases in the number of people cycling.</li> <li>• With this increase comes the need to provide safe and secure storage for people when at home, work or shops.</li> <li>• This can have an important impact by ensuring that people have easy access to safe and secure storage. This could increase the use of bikes by making it more straightforward to access a bicycle to carry out day to day tasks reducing the burden on public transport and the need to use a private car supporting our ambitions to reduce carbon emissions and improve people's health and wellbeing.</li> </ul>		
Peatland Restoration	<ul style="list-style-type: none"> <li>• It is not clear how many applications these changes may remove from the system. Currently planning applications are not being pursued for the 70 or so projects each year. The number and size of projects is expected to rise in line with the target of 20,000 hectares of peatland restoration a year, which could mean planning applications would be sought for more projects in the absence of PDR.</li> <li>• Peatlands cover more than 20% of Scotland's land area. Healthy peat</li> </ul>	Costs will be for submitting for	

		<p>plays a vital role in carbon storage and combating the effects of climate change, and in maintaining Scotland's water quality and rich biodiversity. Peatlands reduce flood risk and support farming and crofting. They are also part of the wild landscapes that attract tourists to Scotland.</p>	<p>Prior Notification/ Approval.</p>
<b>3</b>	Agriculture	As with option 2	As per option 2. No new issues identified following changes to consultation proposals.
	Digital	As with option 2	As per Option 2 No new issues identified following changes to consultation proposals.
	Active travel	As with option 2	As per Option 2. No new issues identified following changes to consultation proposals.
	Peatland Restoration	As with option 2	As per option 2 above with the addition that there may be costs for authorities in needing to give full consideration to projects which are not in receipt of public money through the prior approval process.

**Declaration and publication**

I have read the Business and Regulatory Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options. I am satisfied that business impact has been assessed with the support of businesses in Scotland.

**Signed: Kevin Stewart**

**Date: 16<sup>th</sup> December 2020**

**Minister's name: Kevin Stewart**

**Minister's title: Minister for Local Government, Housing and Planning**

**Scottish Government Contact point: Neil Langhorn, Planning & Architecture Division**

## **Annex A**

Responses to Consultation and the analysis can be found at:

<https://consult.gov.scot/planning-architecture/programme-reviewing-extending-pdr/>

Additional engagement was undertaken with:

### **Agriculture**

In addition to the engagement carried out ahead of consultation, further engagement was carried out with Heads of Planning Scotland and NFU Scotland. We also discussed the proposals at the Ministerial horticultural roundtable – a group convened by Scottish Government which brings together a number of farming businesses and meets regularly to discuss issues affecting the sector.

### **Digital**

Further engagement was undertaken with Cellnex, Mobile Uk and BT Openranch. The main concerns expressed were with the introduction of prior approval process which would add additional cost and delay to processes that are currently in place. However, generally respondents were supportive of the changes that were proposed although some felt that they could go further to provide even greater benefit.

### **Active Travel Related Developments**

We engaged with Sustrans and Transport Scotland during the preparation of the consultation paper and following the publication of the consultation we engaged the following businesses involved in the provision of bike storage solutions:

- Lockit-Safe Bike Storage
- Bikedock Solutions
- Broxap
- Code Store
- Cyclepods
- Cyclehoop
- Grease Monkey Cycles
- Falco

The responses received and follow up discussion gave helpful information about the sizes of bike stores that are available and the maximum sizes of bike stores which the legislation should specify in order to provide practicable storage solutions.

We also engaged with Edinburgh City Council's Planning Service after the consultation to discuss the agreement reached between the council and Spokes (a cycling organisation) regarding the maximum size of householder bike sheds which the council would support in an application, and the whether the resulting developments had an adverse impact on visual amenity.

### **Peatland Restoration**

Have had limited time to engage directly with landowners/applicants on peatland but have we have engaged with:

NatureScot (SNH) who oversee the peatland action funding programme and who provide advice and support to landowners and businesses wanting to undertake peatland restoration



The IUCN UK Peatland Programme team (based at Scottish Wildlife Trust) who oversee the delivery of the peatland code in Scotland which verifies/certifies the climate change benefits of peatland restoration projects for private sector bodies.

In addition, CONFOR (the Confederation of Forest Industries) submitted a late response – expressing concern about impacts on sustainable forest management where felling/woodland removal is involved in peatland restoration projects.

The National Trust for Scotland and RSPB (who will themselves be undertaking restoration projects) agreed with the proposal for PN/PA.