



Cara Davidson
Environmental Assessment Team,
Directorate for the Built Environment,
2H- Victoria Quay
Edinburgh
EH6 6QQ

27 August 2010

Scottish Environment LINK
2 Grosvenor House
Shore Road
Perth
PH2 8BD

Tel 01738 630804
Fax 01738 643290

enquiries@scotlink.org
www.scotlink.org

Dear Ms Davidson

The Environmental Impact Assessment (Scotland) Regulations 2010 – Scottish Environment LINK response to consultation paper

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations, with over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. LINK members welcome the opportunity to comment on the Scottish Government's proposals for consolidating and updating Part II of The Environmental Impact Assessment (Scotland) Regulations 1999. We broadly welcome the consolidated Regulations and provide some more specific comment below.

- We welcome the proposed changes that would require all changes or extensions to Schedule 1 development to be screened for any likely significant effects on the environment. This would ensure that incremental small scale development that could result in cumulative or in-combination likely significant effects on the environment would need to be at least considered for environmental assessment.
- For similar reasons as above, we welcome the proposed changes that would require development to be screened where the development as extended would meet or exceed the relevant Schedule 2 threshold.
- We welcome the intention to require reasons for negative screening decisions. This will help ensure a more transparent and balanced decision making process.
- We welcome the introduction of the need to consider the various proposed types of planning application as multi-stage consents. The full potential environmental effects of a proposal are often not known until the detail of matters reserved for further approval is available. It is critically important that there is an opportunity to require these to be assessed before any decision is made on their acceptability.
- It should be made clearer within the new Regulations that assessment of cumulative impact with other development would include assessment of the cumulative impact of any extension with the impact of the original development that would be extended. This also needs to consider the impact that will arise from development that is proposed but not yet completed.

Scottish Environment  The voice of Scotland's environment movement

Registered Office: 2 Grosvenor House, Shore Road, Perth PH2 8BD. A Scottish Charity under Scottish Charity No SC000296.
Scottish Environment LINK is a Scottish Company Limited by guarantee and without a share capital under Company No SC250899.



I hope the above comments are of assistance in preparing the new Regulations. However, please do not hesitate to contact me should you require any further information.

This response has been compiled on behalf of the Scottish Environment LINK Planning Task Force and is supported by the following organisations:

- Archaeology Scotland
- The Association for the Protection of Rural Scotland
- Buglife
- The National Trust for Scotland
- RSPB Scotland
- The Scottish Wildlife Trust
- The Woodland Trust Scotland

Please do not hesitate to contact me should you require any further information.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Aedán Smith'. The signature is written in a cursive style with a long horizontal stroke at the end.

Aedán Smith
Convener, Scottish Environment LINK Planning Task