



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

Tel: 01738 630804  
Fax: 01738 643290

[enquiries@scotlink.org](mailto:enquiries@scotlink.org)  
[www.scotlink.org](http://www.scotlink.org)

David Reekie  
The Scottish Government,  
Area 2J South,  
Victoria Quay,  
Edinburgh.  
EH6 6QQ

20 June 2012

Dear David

## **SCOTTISH GOVERNMENT CONSULTATION ON THE GENERAL PERMITTED DEVELOPMENT ORDER 2012**

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. We welcome this opportunity to comment on the above consultation.

As permitted development rights (PDR) remove the requirement for planning consent from a planning authority, in most cases they remove any opportunity for third parties to comment on proposals or for the planning authority or third parties to influence the design of development proposals. It is therefore critical that PDR are not expanded to include any activities where there is a risk of environmental harm.

Scottish Environment LINK particularly welcomes the proposal to amend classes 18, 22 and 27 to ensure that the formation or alteration of new access tracks would require the submission of a planning application. The restriction on maintenance to prevent a material change to tracks is also welcome and is necessary to ensure that narrow or ill-defined tracks are not upgraded as a means of circumventing the intention of legislation. It is assumed that the word 'alteration' under classes 18 and 22 will be removed, although this is not stated explicitly in the consultation.

We also believe that class 19, minerals working for agriculture, should be removed to ensure that this activity also receives the full scrutiny of the planning consent process.

We are disappointed that PDR under Class 20 (land drainage works) have not been removed. Land drainage has the potential to impact on natural and cultural heritage interests, including important carbon stores such as peatlands, potentially affect water quality, and to exacerbate flooding. All new or significantly upgraded drainage works should require planning permission. For the same reasons, and to ensure consistency, similar amendments should be made to class 18A(1), irrigation or drainage for agriculture.

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 these comments are of assistance in finalising Scottish Government's proposals for an amended GPDO, however please do not hesitate to contact me should you wish to discuss any matters further.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Aedán Smith'. The signature is fluid and cursive, with a prominent 'A' and 'S'.

---

Aedán Smith  
Convener, Scottish Environment LINK Planning Task Force

This response was compiled on behalf of the Planning Taskforce and is supported by:

Archaeology Scotland  
Association for the Protection of Rural Scotland  
Badenoch & Strathspey Conservation Group  
Buglife  
Bumblebee Conservation Trust  
Cairngorms Campaign  
John Muir Trust  
The National Trust for Scotland  
North East Mountain Trust  
Plantlife  
Ramblers Scotland  
Royal Society for the Protection of Birds  
Scottish Campaign for National Parks  
Scottish Ornithologists Club  
Scottish Raptor Study Groups  
Scottish Wild Land Group  
Scottish Wildlife Trust  
Woodland Trust Scotland