



Directorate for the Built Environment
The Scottish Government
2-J (South), Victoria Quay
Edinburgh
EH6 6QQ

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

Tel 01738 630804
Fax 01738 643290

enquiries@scotlink.org
www.scotlink.org

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Dear Sir or Madam

Consultation on Amendments to the Modernised Planning System

Scottish Environment LINK is the forum for Scotland's voluntary environment organisations - over 30 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society. This response is prepared by LINK's Planning Task Force, and supported by the following LINK members:

Archaeology Scotland
Buglife
Mountaineering Council of Scotland
RSPB Scotland
The Association for the Protection of Rural Scotland
The Scottish Wildlife Trust
Woodland Trust Scotland

Section A - Statutory pre-application consultation requirements and applications to change planning conditions

Scottish Environment LINK (LINK) believes that Scotland's planning system should encourage a wide participatory, consensus driven approach to decision making. Meaningful community engagement and participation in the decision making process from the outset is a key part of delivering a modern 'front loaded' planning system and should remain so. LINK appreciates the inconvenience and costs inherent in pre-application consultation (PAC), however PAC has been one of the positive benefits that has arisen from the reform of Scotland's planning system.

Because Scotland's planning system does not have Third Party Right of Appeal, PAC is vital to partially off-set the lack of this right of appeal.

Scottish Environment  The voice of Scotland's environment movement

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LINK believes that Option 1 and 2a are undesirable and would reduce the opportunity for community involvement. A reduction in the 12 week period may potentially impact on responses from communities that are time limited and/or dispersed.

Option 2(b) may be acceptable, but would need to be backed up by direct notification of all parties interested in the original application of any Section 42 applications.

We consider Option 3 could create confusion, increase bureaucracy and lead to inefficiency in the planning process.

Other options are likely to be more complex. LINK believes that lowering the threshold of requirements for consultation would not be desirable e.g. only requiring consultation with the community council. Community councils are very varied; whilst many are excellent, well organised and are typical of the communities they purport to represent, others are less so. In addition, for many major and national developments, there is often an element of wider public interest; the views of which may not be captured by the community council.

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

Yours faithfully,

Dr Maggie Keegan
On behalf of Scottish Environment LINK Planning Task Force