

28 November 2019



Mr Kevin Stewart MSP
Minister for Local Government, Housing and Planning
The Scottish Government
St Andrew's House
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Dear Minister

Request for a meeting with LINK Hilltracks sub-group

We are writing on behalf of the Scottish Environment LINK Hilltracks sub-group to request a meeting with you.

During the passage of the Planning Bill, we were pleased to note your commitment, at both Stage 2 and Stage 3, in response to amendments raised by Andy Wightman MSP, that the issue of hilltrack regulation would be considered in the government's forthcoming review of permitted development rights (PDRs).

This is an issue which has been of growing concern to conservation and recreation bodies for over 50 years. While we have been alarmed by the significant environmental and landscape damage which can be caused by badly constructed tracks, we are also concerned that the public has little chance to engage with the planning process, creating a democratic deficit.

This situation should be contrasted with the protections that are rightly placed on our historic built environment where planning is tightly controlled, yet the current planning process allows minimal public oversight of hilltracks in many of our much treasured landscapes and designated sites. We should emphasise that we recognise that tracks may be an essential land management tool for genuine land management purposes and we are not trying to ban the construction of tracks but rather to bring a measure of democratic control over them, including opportunities for members of the public and representative bodies to comment on track proposals.

We warmly welcome the forthcoming PDR review, and as LINK we plan to respond to the current consultation on the government's proposed work programme for reviewing and extending PDRs in Scotland. Nevertheless we also remember engaging in the previous consultation into PDRs in 2011, which, in [2012](#), on the basis of compelling evidence of the damage caused by some tracks which was provided by our organisations, recommended that the removal of PDRs for tracks was the appropriate option. However, the eventual result of this earlier consultation process was the lesser requirement for Prior Notification, through the Town and Country Planning (General Permitted Development)(Scotland) Amendment (No.2) Order 2014.

You will be aware of our [Changing Tracks](#) report published in 2018 which used evidence from our monitoring of the implementation of the new Prior Notification process and made

recommendations accordingly. While we acknowledge that Prior Notification has brought some benefits, serious deficits remain. We would therefore be very grateful for the opportunity to discuss the various options for change with you further at your convenience. We would also be very pleased to organise a site visit for you, perhaps near Edinburgh depending on your availability, to demonstrate our concerns.

We can be contacted through the LINK office noted above.

Thank you for your consideration of this matter and we look forward to hearing from you.

Yours sincerely

Helen Todd and Beryl Leatherland
Co-conveners, LINK Hilltracks sub-group

The following organisations are members of the LINK hill tracks campaign group:

Association for the Protection of Rural Scotland	North East Mountain Trust
Badenoch & Strathspey Conservation Group	Ramblers Scotland
Cairngorms Campaign	RSPB Scotland
John Muir Trust	Scottish Campaign for National Parks
National Trust for Scotland	Scottish Wild Land Group

The campaign is also supported by Mountaineering Scotland who are not LINK members.