



THE MOUNTAINEERING COUNCIL OF SCOTLAND

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4/11/10

ModernisedPlanningSystemAmendments@scotland.gsi.gov.uk

Dear Sir / Madam

Consultation on Amendments to the Modernised Planning System

Please accept these comments from the Mountaineering Council of Scotland (MCoFS). The MCoFS is the representative body for hill walkers, climbers and ski tourers, and is the only national representative body of the sport of mountaineering in Scotland. We have 10,500 members, and are recognised by the Scottish Government as representing the interests of all mountaineers.

Section A – Statutory Pre-Application Consultation Requirements and Applications to Change Planning Conditions

The MCoFS appreciates the inconvenience and costs inherent in pre-application consultation, however this is one of the great gains from the modernised planning system and should not be lost. The lack of a Third Party Right of Appeal means that all community engagement is restricted to the start of the planning process and pre-application consultation is vital to partially off-set the lack of this right of appeal, therefore Option 1 is undesirable. Option 2(a) would reduce the opportunity for any community involvement. Due to the nature of communities not always being coherent groups, notification of an application not always being immediately accessed and being composed of people with many other demands on their time, 12 weeks must be retained to maintain the level of engagement. Option 2(b) may be acceptable, but would need backed up by direct notification of all parties interested in the original application of any Section 42 applications. We consider Option 3 to be overly complicated and bureaucratic, and would generally reduce the openness and accountability of the planning system for communities when other policies are aiming to increase engagement. Other options are likely to be more complex than the foregoing. 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; some excellent and others are felt like many in their community as unrepresentative. Additionally, Community Councils are geographic and for major and national developments, there is often an element of wider public interest and of interest to communities, both of which are not represented by Community Councils.

The MCoFS has no comment to make on sections B to G inclusive.

I would be happy to fill in a Respondent Information Form if this is supplied in a way that can be filled in and emailed. Please do not hesitate to contact me to discuss these issues further.

Yours sincerely

Hebe Carus (Ms)
Access & Conservation Officer