Dear Sir/Madam

Consultation on the General Permitted Development Amendment Order 2012

I am writing to you in my role as Chair of the Highland Timber Transport Group, a partnership organisation that has been in place for the last 15 years to try to resolve timber transport problems in the Highlands. Membership of the Group includes The Highland Council, Forest Enterprise, Forestry Commission Scotland (FCS), CONFOR and a wide range of industry and private sector representatives. This response reflects the view of the Group as a whole, and should not be taken as representing the views of individual members, who may submit their own responses. It should be noted that FCS are not part of this response.

The Group considered the above consultation at their meeting on 7th June, particularly in relation to the proposed removal of Permitted Development Rights for the formation or upgrade of Forestry Access tracks under Class 22. It was recognised that there was an issue with poorly designed open ground hill tracks unconnected with forestry but it was felt that the application of increased regulation to forest roads may adversely impact on the Group’s activities to resolve timber transport problems.

The Group is currently involved in seeking resolution of a number of timber extraction problems in the Highlands, where extensive planting 30-50 years ago was not matched by upgrading of the local road network to carry the maturing timber to market. In many of these situations linking “in-forest” road networks is a preferred solution, both from an environmental and economic viewpoint. Such solutions can be difficult to deliver, with multiple ownerships, differing priorities, cost constraints and time pressures all in the mix.

Forest road networks are currently subject to rigorous assessment through the Forest Plan procedures (private sector) and Forest Design Plan procedures (Forest Enterprise) already in place. They are also subject to the EIA (Forestry) (Scotland) regulations 1999, and forest roads within a National Scenic Area already require planning permission. The Group therefore feels that the need to further seek Planning Consent for all forest roads, with
further implications for time and cost, is an additional, and in its view unnecessary, constraint.

The Scottish Government has set up the Timber Transport Fund to help deal with timber transport problems and the Highland Group has been highly active in encouraging partnerships to apply for this funding. It is the view of the Group that the extent to which the proposed limiting of Permitted Development Rights may cut across the ease of delivery of such solutions is a matter that deserves to be recognised and which merits close consideration.

Yours faithfully

Cameron Kemp

Chairman

Highland Timber Transport Group