

Response ID ANON-VDDE-RPFN-S

Submitted to **Proposed Scottish Borders Local Development Plan**

Submitted on **2020-12-01 14:56:51**

About you

Are you responding as an: individual, group / organisation, agent?

Group / organisation

Group / organisation

Group / organisation

Group / organisation:

Scottish National Parks Strategy Project

Name:

John Mayhew

Email address:

[REDACTED]

Contact telephone number :

Proposed Local Development Plan Menu

Where would you like to go?

Submit your response to the consultation (Exit)

Comment on Introductory Chapters or Appendices

Which Introductory Chapter or Appendix are you commenting on?

Context or Appendix:

8. Delivering Sustainability and Climate Change Agenda (P 33-36)

What are your comments regarding this Introductory Chapter or Appendix?:

This response is submitted jointly on behalf of the Scottish Campaign for National Parks (SCNP) and The Association for the Protection of Rural Scotland (APRS), which have been campaigning for the last decade for a strategic approach to the designation of more National Parks (NPs) in Scotland. Further information about the background to and activities of this campaign can be found at www.scnp.org.uk.

INTRODUCTION

We fully support the statement at paragraph 8.15 that the Council will further consider the proposal for a Scottish Borders National Park, including investigating what would be involved in establishing a designation and considering site options. We strongly urge the Council to retain this commitment in the adopted LDP, for the reasons set out below.

STRATEGIC CONTEXT

Our case for a national strategy for more NPs is set out in our 2013 report "Unfinished Business", which can be read at www.scnp.org.uk/publications. Scotland has some of the finest landscapes in the world, many the equal of NPs in other countries. Scotland's first two NPs have achieved a great deal in their first decade; they represent remarkable value for money and provide a wide range of environmental, social and economic benefits to local residents, visitors and Scotland as a whole.

We consider that these benefits should now be spread more widely, through a national strategy to add more parts of Scotland to the worldwide family of NPs. This would bring additional resources to places which deserve it, strengthen Scotland's international standing for environmental protection and support our crucial tourism industry. There is substantial national public support for NPs, and local support for designating further NPs in some parts of Scotland. Designating a special area as a NP is the best way to:

- generate a high profile
- support its active management as well as its protection
- encourage integrated planning and management by all public bodies, and
- invest additional national resources in helping both residents and visitors to enjoy the landscape whilst conserving it for future generations

Substantial political support exists for the creation of more NPs: four of the five political parties represented in the Scottish Parliament support the designation of

more NPs, and representatives of these parties spoke in favour of more NPs in a Parliamentary Debate in May 2017. In a further debate in October 2019 marking the centenary of the 1919 Forestry Act, Members of the Scottish Parliament unanimously agreed to a Labour amendment recognising the contribution that National Parks make to forestry. The relevant extract from the amended motion reads: “the Parliament ... believes that new national parks should be designated.” This is highly significant, as it is the first time that the Scottish Parliament has voted for the designation of more National Parks.

PROPOSED SCOTTISH BORDERS NATIONAL PARK

In “Unfinished Business” we identified seven areas which we consider meet the designation criteria for NPs. One of these areas was the Cheviots area of the Scottish Borders. The case for and description of the proposed Cheviots National Park was set out in “Unfinished Business” as follows:

“The Scotland/England border runs along the ridge of the Cheviot Hills, so the southern flanks of the Cheviot Hills in England are included in the Northumberland National Park, yet the northern flanks in Scotland have only limited protection through Area of Great Landscape Value (AGLV) designation. However, the landscape quality of the northern side is as great as, if not greater than, that to the south, so there would be a great deal of sense in extending the Northumberland National Park into Scotland. This would be the first cross-border National Park in the British Isles, although this would not be particularly unusual, as there are several examples of cross-border National Parks elsewhere in the world. The Cheviot Hills feature extensive grassy moorlands with frequent rocky outcrops. The largely treeless valleys which cut into the uplands often allow open views to layered ridges of hills, giving visual depth to views into and within the area. Strong contrasts prevail between the remote, wild summits and the quieter, less dramatic valleys.”

This description sets out the underlying rationale for the initial SCNP/APRS Cheviots National Park proposal being based around the core area of the northern Cheviots adjoining the Northumberland National Park, rather than around other high-quality Borders landscapes such as for example upper Tweeddale or the Berwickshire coast.

SUBSEQUENT DEVELOPMENTS

A number of developments related to this argument have occurred since the publication of “Unfinished Business”. The most significant of these has been the emergence of the Campaign for a Scottish Borders National Park and the publication of its comprehensive and professional Feasibility Study in September 2017. We were fully involved in and contributed to the preparation of the Feasibility Study.

The Cheviots AGLV has been replaced by the Cheviot Foothills Special Landscape Area (SLA), following a review of local landscape designations by Scottish Borders Council. We now realise that a National Park in the Borders would not in fact involve “extending the Northumberland National Park into Scotland” nor would it be a “cross-border National Park”, as it would in fact be a separate National Park designated under the National Parks (Scotland) Act 2000. However, if a Cheviots National Park were to be established, it would probably wish to co-operate closely with the neighbouring Northumberland National Park, for example through seeking close integration between the National Park Plans for the two adjoining areas.

AREA THE NATIONAL PARK SHOULD COVER

The boundaries of the proposed NP must be determined according to the conditions set out in the National Parks (Scotland) Act 2000:

“(a) that the area is of outstanding national importance because of its natural heritage or the combination of its natural and cultural heritage,

(b) that the area has a distinctive character and a coherent identity, and

(c) that designating the area as a National Park would meet the special needs of the area and would be the best means of ensuring that the National Park aims are collectively achieved in relation to the area in a co-ordinated way.”

Although the initial SCNP/APRS proposal in “Unfinished Business” was for a National Park centred on the northern Cheviots, several other high-quality landscapes lie nearby, including the Teviot Valleys SLA, the Tweed Lowlands SLA and the Eildon and Leaderfoot National Scenic Area (NSA). The 2017 Feasibility Study discusses possible boundaries in some detail, and makes a convincing case for the National Park to extend out from its Cheviots core towards the Tweed valley to include the areas around Jedburgh, Kelso and Melrose, and possibly also south into upper Teviotdale and upper Liddesdale. As a result of this the local campaign now refers to “Scottish Borders National Park” as its working title rather than “Cheviots National Park”.

TOWN AND COUNTRY PLANNING

All the experience gleaned by NPs throughout Scotland and the rest of the UK indicates that they are best placed to deliver effective services to local communities and to the landscapes in their care if they have both development planning and development management powers under the town and country planning system. All 15 NPs in the UK have development planning powers; the Cairngorms NP is one of only two which does not have development management powers. This split of planning responsibilities has proved to be unnecessarily complex and confusing for all concerned, including local communities, developers, local authorities and non-governmental organisations, to the extent that even the Cairngorms National Park Authority (NPA) itself is now calling for development management powers to be transferred to it. We therefore recommend that the Borders NPA should have both development planning and management powers.

RESOURCES

Scottish NPs are 100% funded by the Scottish Government, so the creation of a Borders NP would bring substantial additional resources into the area, although these would be made available to the NPA rather than to the Council. International evidence demonstrates however that NPs invariably generate considerably more income for the areas they cover than is spent on their relatively modest running costs.

What would you like to do now?

Proposed Local Development Plan Menu (includes Exit option)