

# Response ID ANON-7TG7-FA71-R

Submitted to LDP2 - Main Issues Report  
Submitted on 2019-01-29 14:21:56

## Data protection

### About you

Are you responding as an: individual, organisation, or an agent acting on behalf of a client?

[REDACTED]

### Organisation

If you are responding as a representative of a group or organisation, please provide details below:

Organisation:

[REDACTED]

Name:

[REDACTED]

Job title:

[REDACTED]

Address line 1:

[REDACTED]

Address line 2:

Address line 3:

Town/city:

[REDACTED]

Postcode:

[REDACTED]

Contact number:

[REDACTED]

Email address:

[REDACTED]

## Vision aims and spatial strategy

### Question 1

Q1 Agree aims LDP2:

### Growing our economy

#### Question 2

Q2:

Q2 upload:

No file was uploaded

#### Question 3

Settlement business allocated:

Upload Q3:

No file was uploaded

#### Question 4

Business Use Towns:

**Upload Q4:**

No file was uploaded

**Question 5**

**Land delivery effectively:**

**Question 6**

**Agree?:**

**Upload Q6:**

No file was uploaded

**Planning for housing****Question 7**

**Housing agree?:**

**Upload Q7:**

No file was uploaded

**Question 8**

**Housing countryside:**

**Upload Q8:**

No file was uploaded

**Question 9**

**Agree removed housing :**

**Supporting our town centres****Question 10**

**Core Activity Areas:**

**Question 11**

**Berwickshire supermarket:**

**Upload Q11:**

No file was uploaded

**Question 12**

**Develp contrib town:**

**Delivering sustainability and climate change agenda****Question 13**

**Support alternative option:**

**Question 14**

**National park:**

Yes.

**STRATEGIC CONTEXT**

The Scottish Campaign for National Parks and The Association for the Protection of Rural Scotland have been jointly campaigning for several years 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 on the project webpage for our joint Scottish National Parks Strategy Project - search for "Scottish National Parks Strategy".

Our case for a national strategy for more NPs is set out in our 2013 report "Unfinished Business", which is attached to this response. 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 and represent

remarkable value for money. They inspire pride and passion amongst local people and visitors, and they 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.

## 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 subsequent to 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 preparation of the comprehensive and professional Feasibility Study which it published 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 be likely that it would 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 are statutorily required to 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 is understandably referring to "Scottish Borders National Park" as a 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.

### Upload Q14:

Unfinished Business March 2013.pdf was uploaded

## Regeneration

### Question 15

Agree redevelopment:

### Upload Q15:

No file was uploaded

## Settlement Map

### Question 16

Oxnam settlement:

### Question 17

Core frontage Newcastleton:

## Planning policy issues

### Question 18

Agree amendments appendix3:

## Any other comments

### Question 19

Other main issues:

## Landowner details

Have you submitted any site suggestions in this consultation?

No

If yes, please confirm the site and provide the landowner details (if known) for each site you have suggested.: