

Scottish Borders Council - Draft Local Landscape Designations Review

Pentland Hills Regional Park Joint Committee

16th December 2011

Purpose of report

- 1 To inform the Joint Committee about a recent consultation by Scottish Borders Council on Draft Supplementary Planning Guidance on Local Landscape Designations and to report on the consultation response submitted by the Regional Park Manager.

Main report

- 2 The entire Pentland Hills range is currently designated as an Area of Great Landscape Value (AGLV). The AGLV designation dates back to the 1960's and has served to ensure that appropriate consideration is given to landscape conservation when applications for new development are considered by planning authorities.
- 3 Following new national guidance, Scottish local authorities are reviewing their Landscape Designations to achieve greater consistency in approach. The Pentland Hills range covers 5 local authority areas: City of Edinburgh, Midlothian, West Lothian, South Lanarkshire and Scottish Borders. All five are at different stages in the process.
- 4 The new terminology for Local Landscape Designations will be 'Special Landscape Areas' (SLA's). This means that the single AGLV designation for the Regional Park would be replaced by multiple SLA designations made by the respective local authorities.
- 5 Currently, City of Edinburgh Council has identified the Pentland Hills a Candidate Special Landscape Area. This will be confirmed within the Edinburgh Local Development Plan, expected to be adopted in 2014. South Lanarkshire Council is reviewing its local landscape designations and is also proposing the Pentland Hills as an SLA. West Lothian Council is committed to reviewing its AGLV designations within the current local plan period and presently recognises the AGLV and sensitivity of the Pentland Hills for planning purposes. Similarly Midlothian Council recognises the AGLV for planning purposes and will be reviewing its landscape designations in due course.

- 6 Scottish Borders Council recently held a consultation on its Draft Local Landscape Designation Supplementary Planning Guidance. The consultation period ended on the 11th November. The draft guidance does not include the Pentland Hills as a proposed Special Landscape Area. The significance of this is that should the new set of SLAs be adopted as proposed, the AGLV applying to the Borders area would cease to apply for planning purposes. This would raise the possibility that different parts of the Pentland Hills might have different levels of landscape protection.
- 7 The original concept for the Regional Park recognised the importance of considering the whole hill range as a single geographical feature. This applies to landscape, habitat, recreational access, land uses and future opportunities for land based economic development. Although the park boundary aligns principally with local authority boundaries, the wider regional value of the entire hill range transcends the Regional Park and local authority boundaries.
- 8 The Regional Park Manager's consultation response is attached in Appendix 1. The response highlights the importance of a consistent approach to landscape designations in the Pentland Hills and requests that a Special Landscape Designation is applied to the area in the final Supplementary Planning Guidance. City of Edinburgh Council, Midlothian Council, West Lothian Council; and South Lanarkshire Council have all responded to the consultation with similar recommendations. Scottish Natural Heritage have also raised concerns about the importance of consistency. These responses are shown in Appendices 2-5.

Financial Implications

- 9 There are no financial implications.

Equalities Impact

- 10 There is no equalities impact arising from this report.

Environmental Impact

- 11 The existing AGLV designation provides a consistent approach to landscape protection throughout the Pentland Hills. Not including the Scottish Borders area of the Pentland Hills as a Special Landscape Area presents a risk that the longer term conservation of this regionally important landscape could be compromised.

Recommendations

- 12 It is recommended that the Joint Committee:
 - a) notes the response from the Regional Park Manager attached; and

- b) request for an updated report once the outcome of the consultation exercise is known.

David Jamieson
Parks & Greenspace Manager

Appendices	Appendix 1: Consultation Response from the Regional Park Manager Appendix 2: Consultation Response from Midlothian Council Appendix 3: Consultation Response from South Lanarkshire Council Appendix 4: Consultation Response from West Lothian Council. Appendix 5: Consultation Response from Scottish Natural Heritage
Contact/tel/Email	David Jamieson (Parks and Greenspace Manager, 0131 529 7055) Keith Logie (Parks Development Manager, 0131 529 7916) Alan McGregor (Regional Park Manager, 0131 445 3383)
Wards affected	All
Single Outcome Agreement	<ol style="list-style-type: none">1 We live in a Scotland that is the most attractive place for doing business in Europe.2 We realise our full economic potential with more and better employment opportunities for our people.6 We live longer, healthier lives.10 We live in well-designed, sustainable places where we are able to access the amenities and services we need.11 We have strong, resilient and supportive communities where people take responsibility for their own actions and how they affect others.12 We value and enjoy our built and natural environment and protect it and enhance it for future generations13 We take pride in a strong, fair and inclusive national identity.14 We reduce the local and global environmental impact of our consumption and production.15 Our public services are high quality, continually improving, efficient and responsive to local people's needs.
Background Papers	<ol style="list-style-type: none">1. Scottish Borders Council Supplementary Planning Guidance – Draft Local Planning Guidance - August 2011).2. Guidance on Local Landscape Designations (Scottish Natural Heritage)

Scottish Borders Council
Supplementary Planning Guidance

Draft Local Landscape Designations

Consultation Response from the Pentland Hills Regional Park

1. Introduction

- 1.1 Thank you for the opportunity to comment on Scottish Borders Council's Draft Local Landscape Designations. It is trusted that the following comments will assist and can be taken into account when finalising the Supplementary Planning Guidance. In view of the timescales, this consultation response has been prepared by the Regional Park Manager and will be reported to the Regional Park Joint Committee on 16th December 2011.
- 1.2. The Pentland Hills are the dominant landscape feature in the coastal plain of Edinburgh and the Lothians. The entire hill range, stretching some 27km from the edge of the City frames the views from much of the surrounding countryside of South Lanarkshire, West Lothian, Edinburgh, Midlothian and the Scottish Borders.
- 1.3 The landscape importance of the Pentland Hills range is recognised by its existing designation as an Area of Great Landscape Value (AGLV). This has afforded the Pentland Hills recognition of its special landscape importance and helped secure sensitive planning within the area.
- 1.4 The Pentland Hills Regional Park was designated in 1986 by the former Lothian Regional Council under the provisions of the Countryside (Scotland) Act 1981. The Regional Park has four principal aims:
- To retain the essential character of the Pentland Hills as a place for the peaceful enjoyment of the countryside;
 - To care for the hills so that the landscape and habitat is protected and enhanced;

- Within this caring framework, to encourage responsible enjoyment of the hills; and
- Co-ordination of these aims, so that they can co-exist with farming and other land uses within the Park.

1.5 The Regional Park covers some 9,060 hectares of the Pentland Hills range. However, the original concept of the Regional Park embraced the entire hill range including that today within Scottish Borders and South Lanarkshire. At the time of the designation the former Borders Regional Council and Strathclyde Regional Council decided not to enter into a partnership for the Regional Park and the boundary to this day largely follows the former Lothian Regional Council Boundary.

1.6 The original vision for the Regional Park recognised that the whole hills range should be considered as a geographical entity in terms of landscape, land use, and habitat. The following comments are made within this context.

2. Main Points

2.1 It is noted that the area of the Pentland Hills range within the Scottish Borders area is not a proposed Special Landscape Area (SLA). This raises concern that in future, this part of the hills may not be afforded the same degree of protection against inappropriate development that is currently supported by the AGLV designation. The AGLV designation is referred to in local planning policies and is a factor considered when determining individual applications. Loss of this important landscape designation may undermine the long term conservation of the Pentland Hills as an important landscape feature.

2.2 The hill range should be considered in its entirety and its importance as a harmonious landscape feature on a regional scale recognised. A piecemeal approach to landscape designations across local authority boundaries fails to recognise the integrated geography of the hill range and may leave some areas more vulnerable to inappropriate development than others – this difference being influenced more by local authority boundaries rather than landscape character and importance.

2.3 Paragraph 6.1 of the draft guidance states that:

“...there is a good correlation between the current AGLVs and the proposed SLAs, although there are important areas of differentiation”.

While the importance of differentiation is understood, as is the need not to cover most of the Borders landscape with SLA designations, it is strongly suggested that the loss of AGLV status in the Pentland Hills without replacement as an SLA is inappropriate, given both its local and regional prominence as a landscape feature.

2.4 Paragraph 5.1 describes the Upland SLA Landscape Type as places where:

“...the emphasis of the policy should be on retaining the largely undeveloped and remote character. This means ensuring that any developments are located

and designed to limit their wider visibility and, as far as possible, protecting open skylines and rugged summits”.

This ‘undeveloped and remote character’ accurately describes the southern ranges of the Pentland Hills.

2.5 Regional Parks have an important role to play in helping realise the aims of the Central Scotland Green Network (CSGN). The CSGN has funded two phases of work to develop and implement a woodland strategy in and around the Pentland Hills. This work is not limited to the Regional Park boundary and illustrates the landscape importance of the entire hill range as recognised by the CSGN.

2.6 It is noted with regret that Table 1 states:

“The Pentland Hills AGLV to the West of West Linton has been removed. During phase 1 and 2 of the study approach, it was found that the Pentland Hills AGLV did not score highly enough against the evaluation criteria to be considered further as a proposed Special Landscape Area”

It is suggested that a very strong case can be made under most of the evaluation criteria, particularly when the area is considered in its context as an integral part of the Pentland Hills range. It is suggested that this approach is necessary to secure a consistent planning approach across local authority boundaries.

The study criteria against which the Pentland Hills are particularly strong include:

Phase 1

Typicality - As you enter the Scottish Borders at Carllops, views of the Pentland Hills to the west are highly typical of some of most characteristic upland landscape in the Borders.

Rarity - In a regional context the upland landscape of the Pentland Hills is rare, particularly in relation to the largely coastal plain to the north from which the hill range emerges.

Condition- The Pentland Hills are actively managed as upland estates, farms, open moorland and for recreational access.

Intactness - The Pentland Hills are an intact, well-defined landscape, that although heavily influenced by people, has a settled, well-established pattern of land use, based on rural land management.

Wildness - One of the most unique features of the Pentland Hills is that it offers an experience of relative wildness in very close proximity to large centres of population.

Scenic Qualities - The views of the hill range to the west from the A702 travelling south are of a high quality.

Enjoyment - The hill range includes an extensive network of rights of way and other paths enjoyed by walkers, cyclists and riders. The Regional Park specifically aims to encourage responsible public enjoyment of the area.

Cultural Qualities - The Pentland Hills have an interesting history and association with our cultural past. Literary associations for example include Allan Ramsay and Robert Louis Stevenson. The Friends of the Pentlands recently published a guide to place names in the hills, pointing to the rich cultural history of the hills. A number of other publications celebrate the history and a fondness for the hills held by current and past generations.

Habitat Value – The Pentland Hills provide a valuable upland habitat in general. In particular, West Water reservoir near West Linton is a Special Protection Area and Ramsar Site because of its importance as a roost for over-wintering pink-footed geese. There are numerous other wildlife sites and Sites of Special Scientific Interest within the Pentland Hills.

Settlement Setting - One of the most striking features of the Pentland Hills is the way in which it frames the views to and from settlements around the periphery.

Views - Views to and from the hill range are impressive. From the high ridges there are truly unmatched views of the surrounding landscape of Borders, Midlothian, Edinburgh, West Lothian, and South Lanarkshire. The hills provide impressive views, particularly from the A road network surrounding the range.

Tourist Economy - The Pentland Hills are increasingly embracing the opportunities presented by recreation, access and tourism. Examples include: riding centres (including Carlops), livery, golf, catering establishments, farm shops, and holiday accommodation.

Phase 2

Identity & Coherence – The Pentland Hills Range is a highly distinct and recognisable landscape feature with a well-defined geophysical boundary.

Suitable Size – The Pentland Hills is an extensive hill range with a substantial area within the Scottish Borders boundary.

Boundary Features – The Pentland Hills range has a clearly defined boundary represented by the surrounding ‘A’ road network.

3. Summary and Conclusion

- 3.1 The regional importance of the entire Pentland Hills range as key landscape feature is not fully recognised in the draft supplementary Planning Guidance.
- 3.2 The loss of AGLV status and not replacing it with a new SLA is likely to weaken the long term protection of this important landscape.

- 3.3 A strong case can be made for the Pentland Hills fully meeting the evaluation criteria used in the study.
- 3.4 Scottish Borders Council is asked to reconsider the Pentland Hills for inclusion as an additional Special Landscape Area.

Thank you for taking the time to consider the above. The Pentland Hills Regional Park would be pleased to provide further supporting evidence as required to support the case for inclusion. Please do not hesitate to contact the Pentland Hills Regional Park Manager in the first instance.

10 November 2011

Philip Graham
Assistant Planning Officer
Scottish Borders Council
Planning and Regulatory Services
Council Headquarters
Newtown St Boswells
TD6 0SA

Dear Philip

Draft SPG on Local Landscape Designations

Thank you for your letter dated 11 August 2011 and the opportunity to submit comment on the above document currently subject to public consultation.

This Council wishes to highlight its particular concerns that the adoption of the draft SPG in its current form would result in a significant part of the Pentland Hills range having no local landscape designation protection.

This Council acknowledges the very high quality of landscapes found in other parts of the Scottish Borders Council area, and that this comparative assessment has had a bearing on the proposal to remove landscape protection from the Pentlands. However, it is firmly of the view that the landscape importance of the Pentland Hills requires to be considered in a strategic planning context because of the very significant effect that they have on the landscape setting of South East Scotland, the neighbouring local authorities, the Pentland Hills Regional Park, and also the recreational opportunities they provide for a much wider population than those resident in Scottish Borders.

The Pentland Hills are a seamless hill range crossing several local authority boundaries; they are currently covered by protective landscape designations across the whole hill range (Area of Great Landscape Value in City of Edinburgh, Midlothian, West Lothian and Scottish Borders Council areas and Regional Scenic Area in South Lanarkshire). The 2005 SNH and Historic Scotland Guidance on Local Landscape Designations, at page 18, paragraph 3-12, makes reference to the contribution of landscapes to regional identity. This Council considers the Pentland Hills are significant part of the regional identity of this part of Scotland. It believes that a consistent planning framework is essential to promoting regional identity and represents the most appropriate means of helping to secure and enhance the special landscape qualities and importance of the

whole hill range over the long term, including that part outwith Scottish Borders Council area which is designated as the Pentland Hills Regional Park. The A702 is an important tourist route and a local landscape designation can assist with protecting the local area from inappropriate development which would detract from the tourism potential of this transport corridor and the wider area due to the visibility of the hill range.

The background papers for the emerging Strategic Development Plan (SDP) for South East Scotland outline the strategic importance of landscape protection (Green Network Technical Note). At paragraph 6.32, this states that the application across the SESplan area of a landscape character approach is of primary importance in conserving and enhancing the SESplan area's overall diversity and identity. Paragraph 6.35 sets out that, where protected landscapes exist, "it will be important that green network opportunities aim to connect, conserve and enhance the qualities of these important designations" and, in the section *Spatial Opportunity – National Scenic Areas and Regional Parks* (paragraph 6.37), it is highlighted that green network development opportunities will aim to connect, conserve, and enhance the character of landscapes of national and local importance.

To summarise, this Council considers that landscape designations affecting the Pentland Hills are of strategic importance and should be viewed in a regional context, and that a consistency in landscape designations across the relevant local planning authorities is the most effective way of safeguarding the Hills, recognising their importance to regional identity, recreational opportunities and tourism, and delivering SDP aspirations for green network development.

I trust that these comments are helpful. Please contact me if you to discuss these points further, or require more information.

Yours sincerely



Grant Ballantine
Planning Policy Officer
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Strategic and Local Planning Manager
 Environment and Infrastructure
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Our ref: SA/CC
Your ref:
If calling ask Shiela Alderson
for:
Phone: 01698 455936
Date: 25 November 2011

Dear Sir/Madam

Draft Supplementary Planning Guidance on Local Landscape Designations

I refer to your current consultation on the above document.

I have been sent a copy of the consultation response from the Friends of the Pentlands, dated 11th October 2011, which expresses concern that the part of the Pentlands which lies within Scottish Borders is to lose its local landscape designation status.

Having considered your consultation document I would also be concerned about this proposed change. South Lanarkshire Council has recently undertaken a review of its local landscape designations, and the conclusion of our study 'Validating Local Landscapes Designations' (which can be viewed on the Councils website) was that the Pentlands within South Lanarkshire should be designated as a 'Special Landscape Area' (SLA).

The study noted that the Pentlands in South Lanarkshire forms part of a wider landscape unit which stretches north and east into the Lothian and Scottish Borders. The Pentlands range is considered to have regional importance in terms of service quality and as a major recreational resource. The hills provide a scenic contrast to surrounding lowland farming and extensive urban areas.

Designation by South Lanarkshire as an SLA recognises the distinctive qualities of the western end of the Pentland Hills and its geographic location as part of a wider range.

The Pentland Hills to the north and east (outwith South Lanarkshire) are steeper and more distinctive in character, however it is considered that the area within South Lanarkshire is contiguous with these areas, terminating the unbroken chain of hills stretching from Edinburgh in the northeast to near Biggar and Carnwath in the southwest. The main spine of the chain is not crossed by a metalled road or track and contains no settlement or other significant built development for a distance of some 30km. Pentland Hills is currently designated in a way that reflects its importance in landscape terms in all the local authority areas in which it lies.

Furthermore the hills clearly divide the more densely settled and industrialised Central Belt from the more rural and scenic countryside to the south and east, providing a distinctive backdrop and skyline to views from both sides. The validation of the local landscape designation for the southern end of the hills in South Lanarkshire is at least partly in recognition of the integrity of one clearly imageable and distinctive landscape unit, all the more important due to its location near some of the most densely populated areas in Scotland. I would consider that these principles apply equally to the existing Scottish Borders AGLV.

In the Borders SPG Draft Local Landscape Designation (August 2011) in Table 1 the explanation given for the removal of Pentland Hills AGLV is that during phase 1 and 2 of the study approach it did not score highly enough against the evaluation criteria to be considered further as a proposed SLA. Having reviewed the evaluation criteria (section 3.3) I would be interested to know the scoring assigned to this area, as taking into consideration the forgoing view it is difficult to understand the low score, and I would welcome further information on the scoring of Pentland Hills AGLV.

I feel that perhaps your consultants study has given insufficient weight to the wider regional role of the Pentland Hills as a whole. In addition, the proposed difference in designated status across our boundaries may raise issues in future when dealing with cross boundary applications, e.g. for wind energy developments.

I would therefore be grateful if you could take these comments into account when finalising your SPG.

Yours faithfully

Michael McGlynn
Head of Planning and Building Standards

cc Bob Paterson, Friends of the Pentlands, Carlin Maggie's, Carlingnose Point,
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**West Lothian
Council**

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1.1 Planning Services
Manager

Craig McCorrison

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3rd November 2011

Mr Philip Graham,
Assistant Planning Officer,
Plans & Research,
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Council Headquarters,
Newton St Boswells,
Melrose.

TD6 0SA

Dear Mr Graham

**SCOTTISH BORDERS COUNCIL: DRAFT SUPPLEMENTARY PLANNING
GUIDANCE ON LOCAL LANDSCAPE DESIGNATIONS**

We refer to the above draft guidance which seeks comments by your consultation deadline of 11th November 2011.

West Lothian enjoys the backdrop of the north Pentland Hills and the south eastern part of its administrative area is designated as part of the Pentland Hills Regional Park (PHRP). West Lothian is represented on the PHRP Joint Committee, along with Midlothian Council and the lead council, City of Edinburgh.

The West Lothian Local Plan, adopted in 2009 designates the northern Pentlands as an Area of Great Landscape Value (AGLV) for the high quality of its visual appearance and its special landscape character. The open slopes and distinctive profile are widely visible over long distances from many vantage points in West Lothian any beyond.

Policies ENV 19 & 20 stress a presumption against development which would undermine the landscape and visual qualities of the area.

We welcome Scottish Border Council initiative to review their landscape designations. Indeed, West Lothian Council have recently commissioned independent consultants to review the Lothians Landscape Character Assessment (LLCA) of 1999 as part of the process of preparing a new local development plan. The WLC Development & Transport Policy Development & Scrutiny Panel considered the interim findings of the updated LCA in October 2011.

While this report is almost finalised, it points to the continued valuable contribution of the north range of the Pentland Hills within the West Lothian landscape and as an important landmark landscape in its own right.

The next stage of this project is a review of West Lothian's local landscape designations which will shortly get underway. Without prejudicing that review, early indications from the LCA work to date support the integrity of the current AGLV area across the north west Pentlands within West Lothian. Therefore, in the determination of candidate Special Landscape Areas (cSLA) the high visual and landscape qualities of the Landscape Character Areas that underpin the north Pentlands are anticipated to be continued in terms of the level of designation status and policy protection afforded to them.

You will be aware that the Scottish Natural Heritage and Historic Scotland guidance on cSLA specifies several criteria that includes "Identity & Coherence" where cSLA can cover recognisable landscape units such as upland hills like the Pentland Hills, that extend across administrative boundaries.

The Pentland Hills are covered by five local authority areas and it is West Lothian's view that the current coherent planning policy protection of this regionally significant landscape area must be continued whether by AGLV or a new cSLA designation.

Consequently, we would ask that Scottish Borders Council reconsider their treatment of the south east part of the Pentland Hills range that occurs within your administrative area and promote an additional, 9th candidate Special Landscape Area for this part of the overall hill range. This will continue homologous landscape protection over a sensitive upland area that continues to be under pressure from wind turbine development and other intrusive proposals.

We understand that officials in City of Edinburgh Council, that lead the Pentland Hills Regional Park and also Midlothian Council have similar concerns at the removal of the AGLV designation west of West Linton and will also be making comments on the draft SPG.

If you should wish to further discuss West Lothian's concerns with my officers, please contact either Chris Alcorn or Sarah Collings in Planning Services as above. We look forward to your response.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'A. John', written in a cursive style.



Cllr Martyn Day– Chair of WLC Development & Transport Policy Development & Scrutiny Panel
&
Cllr Carl John, West Lothian representative on Pentland Hills Regional Park Joint Committee

cc Alan McGregor, Pentland Hills Regional Park Manager;
Keith Logie, City of Edinburgh Council;
Grant Ballantyne & James Kinch, Midlothian Council.
Viv Gray & Caroline Reid, Scottish Natural Heritage (Lothians)

Mr Philip Graham
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Our ref: CNS/LP
Your ref: P-D1-8.63

4 November 2011

Dear Philip

Draft Supplementary Planning Guidance on Local Landscape Designations

Thank you for consulting Scottish Natural Heritage on the draft Supplementary Planning Guidance (SPG) on Local Landscape Designations (LLD).

The SPG is based upon the findings of the Scottish Borders Local Landscape Designation Review, undertaken by Land Use Consultants for Scottish Borders Council. SNH supported the production of this study to review the current suite of Areas of Great Landscape Value (AGLVs) and propose areas for designation as Special Landscape Areas (SLAs) to replace them. We played an active role in the project steering group.

This consultation on the SPG allows a wider overview of the proposed SLAs and their planning merits, and also provides an important opportunity for public and stakeholder engagement in the designation review process. We see these twin objectives of reflection on the overall designation review findings and the detailed consideration of issues such as boundaries, proposed statements of importance etc to be a key part of the public consultation process. Close consideration, and if necessary adaptation of proposals as a result of this consultation will, in our opinion, be an important part of the successful implementation of a new suite of local landscape designations across the Scottish Borders

Having been involved with the Local Landscape Designation Review as it progressed, we consider the study methodology and findings to be valid, and are generally content with how these have been put forward as proposed SLAs in the draft SPG. However, on further reflection of the proposed SLAs and consideration of their wider influence, we recognise that we perhaps did not communicate the potential importance of the issue of cross-boundary local landscape designations as fully as we might have. In this regard, we consider that there are issues relating to the current proposals to de-designate the current Pentland Hills AGLV and with regard to the areas to the west and north of the Tweedsmuir Hills and Upper Tweeddale AGLV that would merit further detailed consideration. Our reasoning is as follows:

Pentland Hills AGLV / Western Pentlands Landscape Character Unit UP01

Table 1 of the SPG shows that the Pentland Hills AGLV to the west of West Linton did not score highly enough in the study to be considered further as a proposed SLA.

The ranking of this area and therefore the immediate rationale for removal of the AGLV status is clear from the study process, and we do not wish to take issue with this. However, we are concerned that the mutually supportive benefits of the current co-ordinated approach to landscape designation and planning policy application in this area may be lost by this change.

The Pentland Hills are currently designated for their local landscape value by all the surrounding local authorities as an entire landscape unit, which comprises land within the Local Authority areas of South Lanarkshire, West Lothian, City of Edinburgh and Midlothian. We do consider there is likely to be long term planning merit in maintaining the cross-boundary continuity of local landscape designation within the Pentland Hills, and suggest that the views of the neighbouring local authorities are taken into consideration on this issue.

This idea of partnership working on identifying cross boundary landscapes of importance and the desirability of aligning planning and other policy measures is raised within the SNH / Historic Scotland guidance on local landscape designations (paras 6.7 and 6.9) and is also encouraged in principle by article 9 of the European Landscape Convention.

We would also highlight the wider regional identity of the Pentland Hills and their importance as an entire landscape unit as being of wider influence. Additionally, the existing role that the current Pentland Hills AGLV designation plays in affording an important and valued landscape setting, or buffer, to the frequently visited Pentland Hills Regional Park should also be further considered as a further important influencing factor (SNH/HS guidance para 6.5 is of relevance).

Tweedsmuir Hills and Upper Tweeddale AGLV / Tweedsmuir Uplands SLA

Table 1 of the SPG shows that parts of the existing AGLV were evaluated as being of lower landscape quality and so not considered to be worthy of designation as part of the proposed SLA.

There are similar broad and contextual planning and landscape issues to consider further in relation to the proposed removal of AGLV status from the areas between the Upper Tweeddale NSA / proposed Tweedsmuir Uplands SLA and the council boundary with South Lanarkshire. While we accept the focus of the proposed Tweedsmuir Uplands SLA is on the upland and hill areas rather than the Tweed valley, we note the role that the existing AGLV designation plays in providing some degree of westward and northward setting, or buffer, to the NSA, including key sections of the Tweed valley.

Matters of cross-boundary continuity are also raised in relation to proposals for this area, and while we consider the overall merits of a co-ordinated approach to designation to be less strong here, due in part to the lower recreational use of the area, we would suggest that the opinions of South Lanarkshire Council and others are considered in detail.

Statement of Importance

We support the preparation of a Statement of Importance for each of the proposed SLAs, and welcome their proposed use to inform development management decisions and influence land management practices.

I trust this response is helpful to you. We will of course be happy to discuss any matters with you further.

Yours sincerely

by e-mail to philip.graham@scotborders.gov.uk

Anne Brown
Operations Officer