

Christine Grahame MSP  
PHRP consultation  
Scottish Parliament  
EDINBURGH  
EH99 1SP

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Dear Christine

### PENTLAND HILLS REGIONAL PARK

Thank you for inviting The Association for the Protection of Rural Scotland (APRS) to respond to your consultation proposing the extension of the Pentland Hills Regional Park (PHRP).

### The Association for the Protection of Rural Scotland

APRS is the charity which promotes the care of **all** of Scotland's rural landscapes. We aim to:

- Protect and enhance Scotland's rural landscapes for future generations
- Promote effective planning and landscape protection systems in Scotland
- Encourage genuinely sustainable development in rural Scotland
- Raise awareness of the importance of Scotland's landscapes to its people and economy
- Promote the activity of land managers who care for Scotland's landscapes

We do this by:

- Working in partnership with individuals, other charities, local authority, government and public bodies
- Taking an active part in national policy development and advocacy
- Advising members of the public on how to respond to proposals which affect their local landscapes
- Publicising our work to our members and beyond through our website, quarterly newsletter Rural Scotland and regular email bulletins

This response has been prepared as a result of consultation with the members of our advisory Council, which is elected by our members.

### Introduction

APRS has supported the concept of Regional Parks since their introduction and believes they continue to have an important role in conserving substantial tracts of natural heritage in areas close to large centres of population, whilst providing integrated management of recreational opportunities.

APRS was disappointed that the original proposal to include the entire Pentlands range in the PHRP did not come to fruition in 1986, and so particularly welcomes this initiative.

The Pentland Hills are an important feature of the Lothian landscape, providing a critical element of the setting for Scotland's capital city and a distinctive presence across a large swathe of central Scotland. It would be of great value if the experience gained over nearly 30 years of integrating the management of recreation with other land uses within the existing PHRP could be extended to benefit the whole Pentland Hills range.

**1. Do you support the aim of the proposed Bill to extend the boundary to include the entire Pentland Hills range?**

Yes. It is clear that the compromise boundary established in 1986 lacks logic as it resulted from administrative considerations at the time rather than defensible landscape criteria, so it is right that this anomaly should now be rectified. This will help the entire Pentland Hills range and its surrounding communities to achieve its full potential, and will secure the integrated management of the Pentland Hills for the benefit of future generations.

**2. Where should the southernmost boundary be located?**

This should run along the A721 and therefore include the South Medwin and Black Mount areas, thereby including the full area of the Hills in a more geographically coherent way, unless a strong landscape case can be made not to do so. Landscape character assessment techniques should contribute towards establishing the most appropriate boundary.

**3. Should the western boundary be expanded to include the area around Balerno?**

Yes, including for example the popular Water of Leith corridor; however, it should probably not include the built-up area of Balerno itself, as doing so would bring limited benefits to the objectives of the PHRP.

**4. Do you agree that legislation is a necessary and appropriate means of addressing the issues identified?**

Not necessarily, as presumably the extension could be achieved by secondary legislation under the existing Countryside (Scotland) Act 1967. However, this method could prove complex and time-consuming, given the requirement to consult all owners, occupiers and lessees, so primary legislation could be more effective.

**5. What would be the main practical advantages of the legislation proposed? What would be the disadvantages?**

The extension of the PHRP would spread to a larger area of land and to a greater number of people the significant integrated land management and socio-economic benefits which the PHRP brings to its existing area. These include facilitating the enjoyment of the area by visitors, promoting understanding of the work of land managers in the area, protecting and enhancing the area's important landscape and biodiversity and integrated management of the relationships between these different objectives. We cannot envisage any significant disadvantages with this proposal.

**6. What is your assessment of the likely financial/resource implications of the proposed Bill to you or your organisation? What other significant financial implications are likely to arise?**

The proposed Bill would have no financial/resource implications for APRS. Presumably it would have financial implications for both Scottish Borders Council and South Lanarkshire Council, which would rightly be expected to contribute towards the costs of running the enlarged PHRP.

**7. Is the proposed Bill likely to have any substantial positive or negative implications for equality?**

We agree with the argument in the consultation that extending the boundary would provide potentially greater opportunities for a wide range of people to enjoy the health benefits of outdoor recreation, including people who do not currently benefit from this type of activity. The proposal is therefore likely to have substantial positive implications for equality.

**8. Do you have any other comments on or suggestions relevant to the proposal?**

Securing the support of Scottish Borders Council and South Lanarkshire Council will clearly be crucial to the success of an enlarged PHRP, so we hope that efforts can be made to convince them that the long-term benefits of the proposal to their residents will clearly outweigh the additional financial support which will be necessary.

If an enlarged PHRP is to fulfil its true potential it will need an expanded budget, not just to serve the new parts of the RP but to reverse the spending cuts of recent years which have limited its ability to reach that potential even within its existing boundaries. This may have financial implications for the three existing local authorities involved in managing the RP as well as for the two additional ones.

It would prove valuable to the extended PHRP to have representation on its consultative forum from suitably experienced non-governmental organisations with an interest in the area. One obvious body in this respect is The Friends of the Pentlands, given the long and dedicated service provided by the Friends over the years in giving practical support to the objectives of the PHRP.

Please contact me if you would like me to provide any further information or clarification. If you would like to meet to discuss our response I would be very happy to do so. Please keep me informed about future stages of this process. Best wishes for your welcome efforts to increase the protection afforded to this special landscape.

Yours sincerely

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**Director**