

16th May 2014

Christine Grahame MSP
PHRP consultation
Scottish Parliament
Edinburgh EH99 1SP

Dear Christine

Pentland Hills Regional Park consultation

Ramblers Scotland is the representative body for walkers in Scotland and recognised by **sportscotland** as a governing body of sport. Our charitable aims are to promote walking, secure and facilitate access to land, and to protect the countryside. We have around 6,300 members in Scotland and 55 local walking groups, all run by volunteers.

Ramblers Scotland is pleased to have the opportunity to comment on the consultation regarding the expansion of the Pentland Hills Regional Park and we give our answers to your questions below.

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

Yes. Ramblers Scotland has a long history of supporting the development of national and regional parks in Scotland. We believe that a regional park designation plays an important role in landscape protection and the management of recreation in areas which are close to large centres of population. An extended park area could increase recreation opportunities and benefit the local economies. It may also help to provide a stronger measure of protection against the growth of windfarm and other potentially damaging developments in the western Pentlands, since the importance of the area for recreation will be clear.

We recognise that many questions regarding the boundary and management of the park will be raised during this consultation period, and at present there are a number of issues which are unclear, such as the support of all members of the Joint Committee and Scottish Borders Council and South Lanarkshire Council for this proposal. However, in principle, we feel this is a long overdue initiative. The current area of the PHRP is well-used for recreation, and attracts investment in terms of path improvements, visitor facilities, etc. It may be the case that the new area of the park in the west will remain less visited, providing a quieter alternative for many visitors, and therefore will require less investment. However, it is to be hoped that regional park status would attract more people to visit the new area, thereby relieving some of the visitor pressure currently felt in the PHRP. In this case, new facilities may be required in the extended area and liaison with land management interests will be needed, but again, it is to be hoped that greater funding would also be attracted to the area for

investment in paths, etc, to ensure sufficient resources to manage the larger area, rather than spreading existing resources over a much greater area.

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2. Where should the southernmost boundary be located? Please explain the reasons for your response.

We believe that the boundary of the park should be drawn on geographical and geological grounds and cover the area which is clearly a part of the Pentland Hills range. This should ensure that the area within that boundary has integrity and cohesion as a unit of landscape character, rather than being based on administrative or landownership boundaries. Since we have not surveyed this area, we cannot give a specific answer to this question, but would support an assessment from Scottish Natural Heritage in due course as to the natural boundary for the extension of the PHRP.

3. Should the western boundary be expanded to include the area around Balerno? Please explain the reasons for your answer.

We have no particular view on this point but as stated above, the park boundary should encompass the natural landscape characteristics.

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

Yes, we agree that the park extension should be pursued through legislation. We would hope that Scottish Borders Council and South Lanarkshire Council, as well as existing members of the Joint Committee, are supportive of this proposal.

5. What (if any) would be the main practical advantages of the legislation proposed? What (if any) would be the disadvantages?

The advantages of legislation would be to put the management of the whole area of the extended regional park on a statutory basis, with publically agreed aims. We agree with the points made in paragraph 11 of the consultation document.

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

None to our organisation. We recognise the potential for a PHRP Trust to be established which could raise funding from a variety of sources for the park, and we feel that the widening of the local authority stakeholders to include Scottish Borders Council and South Lanarkshire Council has the potential to bring a wider range of expertise to the management of the PHRP.

7. Is the proposed Bill likely to have any substantial positive or negative implications for equality? If it is likely to have a substantial negative implication, how might this be minimised or avoided?

The legislation could have positive implications for equality. We agree with the position stated in paras 35-37 of the consultation document with regard to greater use of the area for outdoor education activities, especially as it is hoped that two other local authorities would be involved in the management of the regional park.

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

We would be happy to meet to discuss the development of this draft legislation.

Yours sincerely

Helen Todd
Campaigns & Policy Manager

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Director: Dave Morris