



West Linton Community Council

Chairman: Mrs Margaret Harrison, Paulswell Grange, West Linton, EH46 7BH

Treasurer: Mr Derek Lawson, The Old Schoolhouse, Carlops Road, West Linton, EH46 7DS

Secretary: Mr Graham J Tulloch, Bellfield, 16 Robinsland Drive, West Linton, EH46 7JD

29 October 2011

Mr Philip Graham
Assistant Planning Officer (Plans and Research)
Scottish Borders Council
Council Headquarters
Newtown St Boswells
Melrose
TD6 0SA

Dear Mr Graham

Draft Supplementary Planning Guidance on Local Landscape Designations

West Linton Community Council (WLCC) opposes the proposal laid out in the Local Landscape Draft Review 2011 (LLDR) that the designation of the Pentland Hills as an Area of Great Landscape Value (AGLV) be removed.

Although this community council recognises and agrees with the need to rationalise the number of designations it opposes the exclusion the protection a Special Landscape Area (SLA) status would offer the Pentland Hills and suggests the Council would be making an error of judgement if it did not reconsider this proposal.

WLCC notes that other AGLVs within the Scottish Borders have had their boundaries altered but have all been recommended as candidates for SLAs; the Pentland Hills is the only area which has had the designation and therefore protection completely removed, the community council asserts the existing AGLV boundary should slightly expanded to include area UP01 & a reduced UF23 and re-designated as an SLA. The suggested boundary of the SLA should be the Council area boundary to the north, east & west and the A702 to the south.

Before discussing the topics in the LLDR, I would like to point out that the Scottish Borders would be the only local authority of the five in which the Pentland Hills lie not to have some form of protection on "their portion" of the Hills. This makes the omission of an SLA status all the more surprising and could contravene the ideals set out in *the Guidance on Local Landscape Designations by SNH & Historic Scotland in 2004*¹ whereby the special character qualities of the landscape area [should] not [be] adversely affected and that if development does take place it should be of a high standard. The lack of any designation could disproportionately adversely affect the Hills between Dolphinton and Carlops as it will be the only area of the Hills without any development safeguard.

I intend to highlight a number of reasons why the WLCC thinks the decision not to assign an SLA status to the Hills is erroneous and that the expanded area should be designated a SLA. I suggest this option was not explored in the desk study and has resulted in an incorrect recommendation.

¹ <http://www.snh.org.uk/pdfs/publications/heritagemanagement/guidanceonLocalLandscapeDesignations.pdf>



Audit of Landscape Designations

The audit in the LLDR notes both the protected landscapes in neighbouring areas but does not appear to take these into account, we suggest this is a mistake. The audit also notes the overlapping designations within the current Pentland Hills AGLV including an SBC designed landscape at Baddinsgill, with others on the lower ground to the south-east, a SPA, a Ramsar site supporting an internationally important number of wintering Pink-footed Geese *Anser brachyrhynchus*, among others² and a number of SSSIs; it also names three reservoirs contained within the area, however it makes no reference to the dramatic views offered along the length of the A702 within the Scottish Borders Council area and from other vantage points to the south.

The string of hills from Black Mount at the south to Cock Law in the north via Mendick and Mount Maw offer a majestic backdrop and at times dramatic vista and are integral to the full string of Pentland Hills from Tinto to Hill End. If viewed from the edge of the defined 5km buffer these hills become more important as they clearly contrast with the more level and lower altitude land in the foreground.

Mention is given to a “few minor roads and footpaths”. No comment is included that these roads are of historic significance; one being the route of the important north-south drove road over the Cauldstane Slap connecting the livestock marts which were held at West Linton up to the late 1800s where in the region of 30.000 sheep were sold annually³ with stock travelling from the far north of Scotland and northern England, another being the route of a Roman Road and yet another the old Coach Road which was replaced by the current “turnpike”, the A702, in the early 1830s. This Coach Road runs by the “Siller Holes” medieval artefacts of lead mining and Pulpit Rock, a hiding place for Covenanters from the Battle of Rullion Green to the north in 1666, this site sits well with the Covenanters Grave also in the Pentland Hills further to the south.

The views from the Cauldstane Slap are spectacular as from this point one can see for many mile to both the north, over the River Forth and south to the Moorfoot Hills and here the contrast between the immediate area and the surrounding land appears more dramatic.

A simple “desk study” may have suggested the “minor roads and footpaths” to be insignificant however even a slightly more detailed study would have shown the importance of the roads and tracks.

Weighting:

WLCC suggests that whilst it is a useful tool to assign figures to esoteric properties such as those in the Field Survey Recording Sheet the addition of weighting lends a bias and could skew rankings, particularly if the figures assigned are subjective or the topic not fully explored. The Community Council requests that care is exercised when reviewing the ratings recorded; the Community Council further requests the data for the suggested revised area be reviewed.

Landscape Evaluation:

The Field Survey Recording Sheets have no guidance included with them and therefore one must assume it is left to the individual surveyor to note and rank the features included. The rankings and comments must therefore be subjective and contain a degree of inconsistency from area to area.

² http://www.ramsar.org/cda/en/ramsar-documents-list-annotated-ramsar-15868/main/ramsar/1-31-218%5E15868_4000_0

³ http://edina.ac.uk//stat-acc-scot/?message=continue_purl&context=058fbc9d923dd58c694698bc475d025f



West Linton Community Council

Cultural Qualities:

Raking of UP01 is set at low, this despite the existence of the above roads and footpaths and a number of historic and pre-historic artefacts such as stone & flint axe-heads and Roman pottery and a Roman marching camp, Bronze Age cemetery and burial cairns, one of which is the best preserved of its type in the country^{4,5}. The age range of these artefacts and location of the site at the cross roads of important east-west and north-south routes must surely rate a higher ranking.

Habitat Value:

The extended area would include a series of important geological artefacts, a short 'range' of glacial eskers present on the north of the A702 between Hyndfordwell and Ingraston, an area which also includes a wet/boggy habitat which supports a diverse range of fauna as well as being.

There are a number of small distinct areas within the hill range, Garvald Burn for example, of particular importance for biodiversity supporting a range of rare plants and birds; again these areas are not obvious or noted on maps and therefore may have been missed from a desk study.

For these reasons West Linton Community Council requests Scottish Borders Council reconsider the proposal to leave Council's portion of the Pentland Hills without the protection a Special Landscape Area designation would afford them. The Pentland Hills must be regarded as a single entity and to have one portion without protection could lead to inappropriate development which would have a detrimental effect, not only on the immediate area but also that which is bounded by it.

Yours Sincerely

Graham J Tulloch

⁴ Isabelle Paterson, with Susan Oakes, *West Linton: A Brief Historical Guide*, 2000).

⁵ <http://canmoremapping.rcahms.gov.uk/>