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CAMPAIGN FOR A  
SCOTTISH  
BORDERS  
NATIONAL PARK



Photo: Hermitage Castle

AN ANALYSIS OF RESPONSES TO THE  
NATIONAL PARK QUESTIONS WITHIN  
THE SBC MAIN ISSUES REPORT 2018-19

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# 1 Executive Summary

1.1 SBC's Main Issues Report in 2019 included two questions on the National Park proposal, ie:

**Do you support the designation of a National Park within the Scottish Borders?**

**If so, which general area do you think a National Park should cover?**

1.2 Since SBC's own summaries of the MIR responses necessarily covered a much wider range of important issues it could not offer a comprehensive analysis of the responses to the above two questions. This document has therefore been drawn up to assist the members of the Campaign and, primarily, elected members and senior officers of SBC, in their further consideration of this proposal.

1.3 The document provides:

- analysis of the totality of responses
- commentary on the reasons given for support and how they tie in to the statutory criteria and aims for National Parks in Scotland
- analysis of the geographical preferences of supporters for the area the Park should cover
- analysis of the smaller number of objections and how they can readily be addressed by the proposals of the Campaign Team which were formulated before the MIR
- deliberately greater detail on the few objections of those who might be classed as relatively important stakeholders and the specifics of how they can be addressed in the same way.

1.4 Based on the above, the Campaign team has arrived at the following conclusions.

- Of those 103 responses which either supported or objected, the 81 responses in favour represent 79%, while the 22 objections represent 21%.
- **The most conclusive result of this consultation is that there is overwhelming support for a Scottish Borders National Park.**

- Respondents were not asked to give reasons for their preference. Nevertheless a significant number of supporting respondents did. Their reasons, and the frequency with which they appeared in supporting responses were revealing. Firstly and remarkably, they covered all of the statutory aims of, and criteria for, National Parks in Scotland. Secondly, they echoed what the Campaign team has proposed as the most pressing aim for a Scottish Borders National Park, ie to boost economic development. Thirdly, they recognise the superior value of National Park designation when compared to any less permanent PR/advertising. They also echo what the Campaign has posited as the unique selling point of the Scottish Borders: the strong integration of a vibrant and living cultural heritage with an outstanding landscape.
- Five of the objectors (23%) gave no reason, explanation or cogent comment for their objection. The remaining 17 objections include a small number of relatively relevant stakeholders, ie NFU Scotland, Roxburghe Estates, Kelso Community Council and Newcastleton and District Community Council. Most if not all of their concerns, and certainly their *main* concerns, are addressed by documents published by the Campaign well before the Main Issues Report.
- Of the 110 mentions of a geographical preference in answer to the second question, 54 mentions (49%) favoured a minimum of the old county of Roxburgh. 14 of the 56 mentions which did not specifically mention Roxburghshire did mention areas which are either in the old county of Roxburghshire or adjacent to it. The eight places which received only one mention included five areas either wholly or partly within Roxburghshire. **It appears that whatever area might be selected for a firm proposal to the Scottish Government it should include Roxburghshire. The Campaign team is open to any suggestions which expand upon that area.**
- People living outside the Campaign's favoured area who responded are just as aware of the benefits of NP designation as those resident in that area.
- This information should assist in bringing SBC close to making a commitment one way or another to the proposal for a Scottish Borders National Park.

## 2 Introduction

2.1 Scottish Borders Council, in preparing to update its Local Development Plan, published a Main Issues Report (MIR) in September 2018 as a public consultation document. The Council's Planning Department collated all of the responses and produced a report on these which was submitted to a full Council meeting on 26 June 2019.

2.2 The MIR included a short statement about the proposal for a Scottish Borders National Park (the text of this is attached as Appendix 1). This was followed by two questions as follows:

**Do you support the designation of a National Park within the Scottish Borders?**

**If so, which general area do you think a National Park should cover?**

2.3 The MIR also referenced the independent Feasibility Study for further information and provided a link to the online version of the Study.

2.4 This document contains analysis of the responses to these questions, aided by SBC's own summaries and the fuller texts publicly available on the SBC website. A commentary is also provided on each response within Appendix 4. All of this has been undertaken by the Campaign for a Scottish Borders National Park and is intended largely to provide a basis of discussion between Campaign members and the SBC leadership.

2.5 While there are inevitably learning points to take from the organisational and individual responses to the above questions, **the conclusive result of this consultation is that there is overwhelming support for a Scottish Borders National Park.**

### 3 Key results

- 3.1 114 responses were received to the first part of the question. Not all submissions responded to the supplementary question, directed at those in favour, on what general area they thought a National Park in the Borders should cover. Detailed analysis of the 114 responses is included in Appendix 4.
- 3.2 There were a total of 81 responses in support of the proposal (62 individuals, 17 organisations and 2 unidentified).
- 3.3 22 objections were submitted (17 individuals and 5 organisations). 5 of this total gave no reason for objection.
- 3.4 11 responses did not commit either to support or object (5 individuals and 6 organisations) and most of these provided comments.
- 3.5 Out of the total of 114 responses, 81<sup>1</sup> (71%) were in favour of the proposal, 22 (19%) objected and 11 (10%) were uncommitted.
- 3.6 Of the 110 mentions of a geographical preference in answer to the second question, 54 (49%) favoured a minimum of the old county of Roxburgh.
- 3.7 Perhaps most telling, of those 103 responses which either supported or objected, the 81 responses in favour represent 79%, while the 22 objections represent 21%.
- 3.8 The rest of this analysis and commentary aims to show that the understandable but not always fully informed concerns expressed by most of the relatively small number of objectors can readily be overcome by the model of National Park favoured by the Campaign Team. This model has not been dismissed by Scottish Borders Council and there seems little logical reason to suppose that it will be. For that reason the majority of text here is devoted to those objections and some of the uncommitted responders. This should not detract from the fact of the overwhelming support for the proposal.

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<sup>1</sup> There is a minor error in the SBC summary, response 190 appears twice in the list of supporters, this has been corrected in the numbers used in this analysis.

## Support

4.1 Respondents were not asked to provide reasons for their support. Nevertheless a significant proportion of supportive individuals and organisations did. The most common reasons, in descending order of frequency were:

1. Increase/develop tourism/hospitality & leisure industry (19)
2. Protect valued landscape (12)
3. Distinct and coherent cultural heritage/protect natural and cultural heritage (12)
4. Generate and raise profile/permanent marketing boost/instantly and internationally recognised brand (10)
5. Improve economic development (10)
6. Attract investment (7)
7. Focus for outdoor recreation/promote walking, cycling, riding (7)
8. Create jobs (5)
9. Easy access from central Scotland conurbation & northern England cities/ rail link (5)
10. Relative low cost & no cost to SBC (5)
11. For residents – environmental & social benefits, improved quality of life (5)
12. Regardless of boundaries, benefit to all of Scottish Borders (3)
13. No need for more planning restrictions (3)
14. More control on rampant development (3)
15. Enhance biodiversity (2)
16. Support small businesses (2)
17. Benefit farmers selling food (1)
18. Coincides with assessment criteria of MIR (1)
19. Supports active management of the landscape (1)
20. Would not exert pressure on infrastructure (1)

- 4.2 This top twenty may be revealing in several important respects. Firstly and remarkably, it covers all of the statutory aims of, and criteria for, National Parks in Scotland under the National Parks (Scotland) Act 2000. Secondly, it echoes what the Campaign team has proposed as the most pressing aim for a Scottish Borders National Park, ie to boost economic development (the above numbers 1, 4, 5, 6 & 8 aggregated would total 51 mentions). Thirdly, it recognises the superior value of NP designation when compared to any less permanent PR/advertising. Fourthly, it also echoes what the Campaign has posited as the unique selling point of the Scottish Borders: the strong integration of a vibrant and living cultural heritage with an outstanding landscape. And last, but in no means least, it emphasises what SBC and NHS Borders have also identified as important to public health, both physical and mental, ie improving the quality of life, health and wellbeing of Borders residents.
- 4.3 Among the supporters are some significant stakeholders, for instance the Community Councils of Oxnam Water, Southdean, Heriot, and Peebles and District. Crailing, Eckford and Nisbet CC, Lilliesleaf Ashkirk and Midlem CC and Selkirk CC all submitted uncommitted/undecided responses. We have recently heard from Upper Liddesdale and Hermitage CC that, following a residents survey and consultation meeting, that CC has decided to support the Campaign (too late to intimate that via the MIR consultation). There are also national stakeholders in support:- the Association for the Protection of Rural Scotland, Scottish Campaign for National Parks, Ramblers Scotland and the Woodland Trust Scotland. Local conservation groups which promote the concept of landscape value while appreciating the pressures on our constantly evolving working countryside are also prominent, ie the Borders Network of Conservation Groups, Save Scott's Countryside and Minto Hills Conservation Group.
- 4.4 This can be considered alongside existing support such as:
- the majority of the 150 local residents and business representatives who attended a public meeting in Jedburgh Town hall in November 2016 and indicated support for the Campaign
  - the significant businesses who have already backed the proposal publicly, among which are Johnstons of Elgin in Hawick (the leading UK manufacturer of cashmere goods), award-winning Ruberslaw Wild Woods Camping, and BSW Timber in Earlston (the largest combined timber and forestry company in the UK}, as well as many smaller businesses who recognise the opportunities that National Park status would bring.
  - over 800 followers on Facebook.

4.5 It is clear that there is strong local individual and business support for the National Park proposal, as well as significant support from influential national organisations.

## 5 Boundaries

5.1 50 of the supporting submissions (62%) expressed a view on the area which the National Park should cover. One of the uncommitted responses (Scottish Land and Estates) also mentioned some areas suggested by its members and these are included in the breakdown below. The numbers here represent the frequency of mentions of a specific area. The total number of mentions (110) is greater than the 51 responders who expressed a view simply because many responses mentioned more than one area. It should also be noted that several responses either centred on a specific area but did not rule out adjoining areas, or agreed with the proposal to have a National Park and recommended 'inclusion' of a specific area.

### 5.2 In order of popularity from responses to the MIR question

<b>Roxburghshire</b>	<b>54</b>	<b>Yarrow Valley</b>	<b>4</b>
<b>Tweeddale/Tweed Valley</b>	<b>15</b>	<b>All of the Scottish Borders</b>	<b>3</b>
<b>Upper Tweeddale</b>	<b>6</b>	<b>Berwickshire Coast</b>	<b>2</b>
<b>Eildons and Leaderfoot</b>	<b>5</b>	<b>Glentress</b>	<b>2</b>
<b>Co-terminous w Northumberland National Park</b>	<b>5</b>	<b>Pentland Hills</b>	<b>2</b>
<b>Cheviots</b>	<b>4</b>	<b>St Mary's Loch</b>	<b>2</b>
<b>Ettrick Valley</b>	<b>4</b>	<b>Traquair</b>	<b>2</b>

- 5.3 Of the 110 mentions of a geographical preference in answer to the second question, 54 (49%) favoured a minimum of the old county of Roxburgh. 14 of the 56 mentions which did not specifically name Roxburghshire did favour areas which are either in the old county of Roxburghshire or adjacent to it.
- 5.4 The following places all received one mention: Ale Water Valley, Bonchester Bridge area, Borthwick Water, Broad Law, Lammermuirs, Selkirk area, Southern Uplands, Teviotdale. Five of these eight areas are either wholly or partly within Roxburghshire.
- 5.5 The Scottish legislation on national parks allows for Ministers to vary the boundary of a National Park once established and indeed the Cairngorms National Park was expanded in 2010 to include Glenshee and northern Perthshire in response to the wishes of residents there.
- 5.6 Two of the other conclusions which might be drawn from the breadth of areas suggested are:-
- the MIR might more usefully have specified the area favoured by the Campaign - not to show any preference for that area, but in order to give responders a reference or starting point (several commented on the fact that no proposed boundaries were indicated in the MIR)
  - responses from people living outside the Campaign's favoured area indicate that they are just as aware of the benefits of National Park designation as those resident in that area.

## **6 Objections/**

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- 6.1 Five of the objections (23%) gave no reason or explanation for their objection. This does not negate these objections but does mean that it is impossible to address any valid concerns.
- 6.2 A small number of the remaining 17 objections are from significant stakeholders, ie Roxburghe Estates, NFU Scotland, Kelso Community Council and Newcastleton and District Community Council. The arguments and evidence offered by all of these 17 objectors are, by now, well-known to the Campaign. The concerns expressed in these objections have already been countered or at the very least mitigated against in the responses we have already made to address them. Not all objectors have taken the time to look at the Campaign publications in which their concerns have already been addressed.
- 6.3 All of the 17 objections which cite reasons can be mostly or wholly addressed by reference to:-
- The heavily evidenced research produced in the independently compiled Feasibility Study (see [http://www.borders-national-park.scot/FS/NP-Feasibility\\_Study-FULL\\_DOCUMENT.pdf](http://www.borders-national-park.scot/FS/NP-Feasibility_Study-FULL_DOCUMENT.pdf) ) published in September 2017. A hard copy of this Study was sent to all SBC Councillors and to every every public library in the Scottish Borders. SBC officers have commented on the wealth of data and insight provided by this document.
  - The Campaign Team’s favoured approach, giving due consideration to the known views of stakeholders, as published online in January 2018 as a Position Statement (see Appendix 2) and made known to all SBC Councillors by email
  - The publicly available facts referenced in our ‘Economic Impact of a Scottish Borders National Park’ published online in September 2018 (see Appendix 3) and made known to all SBC Councillors by email.
- 6.4 It can be seen that all of the above-mentioned documents were compiled and published **prior to the publication of the responses to the Main Issues Report** and made known by personal email to all SBC Councillors. We emphasise this to underline that the Campaign Team’s countering points have not been arrived at *post hoc* in reaction to the MIR responses.
- 6.5 No councillors have contacted the Campaign to take issue with any of these documents or the facts and assessments laid out within them. We appreciate that this does not indicate approval or support.

- 6.6 Due consideration of the known views of stakeholders which informed our Position Statement anticipated most of the concerns expressed by those objecting in their responses to the MIR. It has therefore been a straightforward matter to point that most of the 17 objectors' concerns listed in the detailed analysis (Appendix 4) can be addressed by the facts quoted in the Feasibility Study and Economic Impact assessment, and/or the approach/position favoured by the Campaign Team in its Position Statement, address the main and certainly most concerns of these 17 objectors.
- 6.7 We shall deal with each of the four main stakeholders' objections in summary here. (All 17 of the objections offering evidence or reasoning are covered in Appendix 4).
- 6.8 It is not clear from its response whether **Kelso CC** is objecting to the town of Kelso being included within the Park boundaries rather than objecting to the "creation of a Scottish Borders National Park". Whatever the case, the Campaign's Position Statement proposes that: "...the whole of the former county of Roxburghshire should be included, with the towns on the boundary i.e. Kelso and Hawick, having the final say on whether they are included or not....". It follows that Kelso CC's wish that Kelso should not be included within the boundary can readily be honoured.
- 6.9 **Roxburghe Estates (RE)** is a respected business business which may legitimately put its own perceived interests ahead of those of the wider community. Having said that, there is much in its response with which the Campaign for a Scottish Borders National Park agrees. For example "sustainable development should be at the core of local government policy ". It is a fact that sustainable social and economic development is one of the aims of Scotland's legislation for National Parks and we are campaigning for a National Park for that very reason: to promote sustained social and economic development in an area which badly needs it.
- 6.10 The independent Feasibility Study published in September 2017 concluded that a Scottish Borders National Park would certainly enhance economic development. International research over the years has shown that National Parks contribute to economic development (see submission in Appendix 4 from the Scottish Campaign for National Parks and the Association for the Protection of Rural Scotland). Our own 'Economic Impact of a Scottish Borders National Park' used publicly available data to show that "figures for the economic impact on the areas 'influenced' by their proximity to Yorkshire Dales National Park, Northumberland National Park and Welsh National Parks [selected as the most comparable in terms of landscape to the Scottish Borders] have shown an additional 100-150% of economic impact due to the NPs encircled by these 'halo' areas".
- 6.11 The Roxburghe Estates' response claims that the experience of some land-based businesses in the Cairngorms National Park was not that "a National Park will create business opportunities by encouraging more visitors". Roxburghe Estates also posits that "The aims

of the NP which are defined in legislation tend to diminish economic and social development in favour of landscape and environmental interests". The latter is only true in very exceptional cases when there is a conflict between these statutory aims which cannot be resolved by negotiation or work-around. As far as benefits to businesses are concerned, Cairngorms NPA uses a 'business barometer' compiled by a consultancy for the NPA and the Cairngorms Business Partnership which tells a different story. In June, 2019 the Barometer's Annual Summary Report stated that "The role of the Cairngorms National Park's status in attracting first time customers was given the highest rating on record in 2018/19. Overall, 63% of businesses considered the Park to have a high influence (attributing a rating score of 7 or more out of 10) attracting new visitors to the area...". But our main point here is that there are several significant and critical differences between the Cairngorms National Park and what is proposed for the Scottish Borders, and all of these differences add up to a very different scenario from that painted in the RE response, in fact they add up to a future in which Roxburghe Estates and other land-owners and land managers could thrive better than they do at present.

- 6.12 As the biggest of the UK's 15 National Parks (there are three in Wales alone, but inexplicably only two in Scotland), the Cairngorms National Park straddles parts of five local authority areas. Loch Lomond and Trossachs National Park straddles three local authority areas. For this reason, when the National Park Authorities were set up for those Parks, it was decided that they would take the option to become a planning authority. It is crucially important to emphasise that Scotland's legislation allows every Park to be operated differently and that it does not stipulate that all National Parks should become planning authorities. All of a Scottish Borders National Park would be contained within one local authority area and so it is not at all necessary for such a Park Authority to become a planning authority. Our Position Statement is very clear on this: "The Campaign sees no benefit in a Scottish Borders National Park imposing further controls. Nor does it want to see scarce public funds spent on duplicating the excellent work of SBC's Planning Department in supporting the Council's statutory obligations as a planning authority. The Campaign team believes that any planning input from the National Park Authority should be limited to setting strategic direction for the Park area and as a statutory consultee. Existing legislation would remain and existing rights would not be extinguished. National Park status can bring greater clarity and structure and a more integrated approach from all responsible agencies".
- 6.13 Roxburghe Estates goes on to state "The level of spending [in the Cairngorms National Park] shows that only a very small proportion is directed towards tourism". The Campaign for a Scottish Borders National Park suggests that it is much more relevant to compare the Scottish Borders with Northumberland, where the National Park has brought significant economic benefits to tourism, as well as to farmers and land-owners. Appendix 5 uses official figures to show the difference between tourism in the Scottish Borders and Northumberland and clearly demonstrates that, despite having a far richer diversity of cultural and built heritage, as well as a greater variety of landscape, the Scottish Borders suffers by comparison.

- 6.14 Roxburghe Estates suggests that "The high proportion of expenditure on planning issues [in the Cairngorms National Park] is believed to impact significantly on land management operations. Existing planning designations and policies in the Scottish Borders are sufficient to protect the region's unique landscape..." We agree that the existing planning regime in the Scottish Borders is more than adequate to meet its planning needs without adding another level. And since the Scottish Borders National Park Authority need only spend an insignificant amount on planning issues, it would consequently spend a much higher proportion of its budget on tourism.
- 6.15 "The Roxburghe Estates fully supports the Borderlands initiative in encouraging enterprise and commercial activity and this is considered a more effective means of delivering sustainable economic development across the Region than a National Park with its principal aims focused on planning and conservation". But the NP proposal, the Borderlands Growth Deal, and the South of Scotland Economic Partnership and what that will develop into, would all be mutually supportive initiatives providing a cohesion for the development of the Southern Borders and beyond, not seen before in the history of this part of Scotland. The Borderlands Growth Deal will provide a welcome boost to the area, however it is a one-off, restricted purely to capital expenditure, and time-limited. National Park designation would provide durable, permanent and sustained economic development across the Scottish Borders by:- considerably raising its profile as a destination; attracting inward investment; encouraging and supporting businesses which maintain the living and developing landscape for farming, sporting and tourism (like Roxburghe Estates); and cascading economic benefit to local communities in terms of local employment and service industries. The following two paragraphs (5.22 & 5.23), and others, in our commentary below on the NFU Scotland response are also equally applicable to the Roxburghe Estates' concerns.
- 6.16 **NFU Scotland** is another respected organisation whose discussions with us in Denholm in January 2017, as well as conversations held with several individual farmers, were subsequently taken on board by the Campaign Team, not least in its Position Statement published before the Main Issues Report. One of the concerns in the NFU Scotland response is that Park designation would result in "further restrictions on how farms operate". We deal with planning matters above and later but it is worth stating that the Campaign Team believes strongly that the Borders, as a worked, living and developing landscape must not be frozen in time, and that those who have managed it responsibly to make it what it is today, must be allowed to continue to develop it in an environmentally responsible manner.
- 6.17 Some of the special qualities of National Park areas like the Borders derive from centuries of work by local people – such as farmland, woodlands, towns and villages. That is why all National Park Authorities in the UK put great effort into supporting environmentally-sensitive farming practices in their areas, including through grant schemes, practical support on the ground and arguing at a national level for better rural development programmes. New research recently published by the Scottish Campaign for National Parks (SCNP)

and the Association for the Protection of Rural Scotland entitled *Support for Farming in National Parks* provides extensive evidence for this through a series of eight case studies from National Parks across Scotland, Wales and England (see: <http://aprs.scot/wp-content/uploads/2019/11/Support-for-Farming-in-National-Parks-November-2019.pdf>). See also para 5.29.

- 6.18 NFUS is also concerned over:- funding of a NP; the possibility that NP designation might be another method of reducing the chance of onshore wind energy production on a blanket basis; and “questionable amounts [of contribution] into the wider economy.
- 6.19 Funding of the National Park would be largely through Scottish Government, so not a noticeably additional burden on individual farmers, land-owners and tax-payers in the Scottish Borders.
- 6.20 Wind farm developers have been largely unsuccessful in gaining planning permissions in the Southern Borders due to the value given to the landscape. This has happened without National Park designation. Furthermore, available subsidies for wind farms do not presently make new *onshore* wind farms economic. All of the main political parties in the current General Election campaign seem to have substituted the term ‘wind energy’ with ‘offshore wind’: perhaps an indication of the growing realisation that onshore wind is neither popular in the areas affected by it nor economic without huge public subsidies. The Campaign for a Scottish Borders National Park supports well-sited micro renewables and other developments that do not adversely impact on landscape value.
- 6.21 As far as planning restrictions on how farms operate is concerned, the NFUS responder may not have read the Campaign’s Position Statement which clearly states that there need be no additional level of planning. The Scottish Borders National Park would be contained within a single local authority and the Campaign Team’s position is for SBC to retain its current planning powers, with the Park Authority as a statutory consultee. SBC has given no indication that it would object to that arrangement should designation go ahead.
- 6.22 As reported in the NFUS response, the Denholm meeting did hear from two farmers from each of the two existing Scottish Parks. However, while the farmer from Cairngorms certainly reported some negative experiences he eventually advised that Borders farmers would benefit overall from designation of a National Park. The other farmer, from Loch Lomond and the Trossachs, was fulsome in his praise for the benefits to farming and diversification.
- 6.23 The penultimate sentence in the NFU response is “If financial support for the rural economy is to move to a more environmental bias post-Brexit and additional income can be gained by farmers by being in a National Park, then we could look at the proposal more positively”. This is particularly telling because both of the last two Conservative UK Governments made it clear that whatever replaces

EU subsidies will be more strongly linked to environmental stewardship than ever before, and indeed the present Scottish Government has made similar pronouncements. It follows that a National Park Authority would be ideally placed to advise and coordinate Borders farmers in maximising the grants/subsidies available, as happens in Northumberland National Park. At a previous public meeting in Jedburgh in November 2016, a farmer from Northumberland told the audience of some 150 people that he had been sceptical of the benefits to farming when the Northumberland National Park was first mooted, but had been gradually convinced otherwise as the Park developed. He eventually became the Chair of the NPA.

- 6.24 The objection from **Newcastleton and District Community Council** (NDCC) is a lengthy series of criticisms of the Campaign, plus arguments claiming that the Newcastleton area is better able to improve its tourist economy without being part of or neighbour to a National Park. All of these comments and counter-claims have been addressed in Appendix 4 in some detail, to the extent that it would give disproportionate space to this one objection if repeated here. It is however worthy of note that the neighbouring CC, that of Upper Liddesdale and Hermitage, has since committed to supporting the NP proposal after a residents survey and consultation meeting.

## **7 Uncommitted Responses (described in SBC summaries as ‘General’)**

- 7.1 Within this category there were 5 individual responses and 6 from organisations. Most of the individual responses felt they had insufficient information to form a definite view (as with one of the 6 organisations, ie Selkirk Community Council), while two felt that there was a conflict or confusion over what the main aims would be. These have all been answered in Appendix 4 by reference to the Feasibility Study and/or the legislation.
- 7.2 Crailing, Eckford and Nisbet Community Council felt that it was too early for them to commit either way on this issue, while Lilliesleaf, Ashkirk and Midlem CC wrote one sentence asking its members what they thought, presumably inserted originally when circulating a draft response but left in erroneously when submitted.
- 7.3 Scottish Natural Heritage acknowledged the issue, quite properly not committing itself either way in view of its role once formal proposals are received by Scottish Government.

- 7.4 The remaining organisation, **Scottish Land and Estates (SLE)**, provided a carefully considered response, having clearly read some or all of the Feasibility Study and our Position Statement (made available in hard copy to all SLE members who attended a meeting on the NP proposal in January, 2019 in St Boswells when Campaign Team and SLE members were given a hearing). A more recent publication of research carried out by the Scottish Campaign for National Parks and the Association for Protection of Rural Scotland is also of particular relevance here: "The principal purpose of a National Park is to care for the special qualities of an area's landscape – its natural and cultural heritage of places and people. Some of these special qualities derive from centuries of work by local people – such as farmland, woodlands, towns and villages. That is why all National Park Authorities in the UK put great effort into supporting environmentally-sensitive farming practices in their areas, including through grant schemes, practical support on the ground and arguing at a national level for better rural development programmes. New research recently published by the Scottish Campaign for National Parks and CNP and the Association for the Protection of Rural Scotland titled Support for Farming in National Parks provides extensive evidence for this through a series of eight case studies from National Parks across Scotland, Wales and England" (see <http://aprs.scot/wp-content/uploads/2019/11/Support-for-Farming-in-National-Parks-November-2019.pdf> ).
- 7.5 The SLE response advises that there is a balanced range of opinion on the proposal across its membership. There were some very positive comments and some concerns (see Appendix 4). The latter are only referred to here with the responses of the Campaign team. In common with Roxburghe Estates and NFUS, SLE's main concern seemed to be planning, so the Campaign's response reiterates our previous comments in response to those other two bodies, as follows: Our Position Statement includes the following outline of our proposal for planning: "The Campaign sees no benefit in a Scottish Borders National Park imposing further controls. Nor does it want to see scarce public funds spent on duplicating the excellent work of SBC's Planning Department in supporting the Council's statutory obligations as a planning authority. The Campaign team believes that any planning input from the National Park Authority should be limited to setting strategic direction and as a statutory consultee. Existing legislation would remain and existing rights would not be extinguished. National Park status can bring greater clarity and structure and a more integrated approach from all responsible agencies". We appreciate that, until designation is granted by the Scottish Parliament, farmers and landowners have no 100% sure-fire guarantee that the planning model will be exactly as the Campaign would wish it. However, it seems that, if the Campaign Team and the existing local planning authority (ie SBC) were both to indicate in favour of such a model (and there is no reason to think otherwise) it is highly unlikely that the Scottish Government could or would ignore such a local preference.
- 7.6 SLE went on to state "While some members note the potential for enhanced business opportunities and diversification, other members feel the Scottish Borders already offers plenty of tourism attractions and opportunities which could be improved with better advertising, signage and road infrastructure; while others remain unconvinced about the added value a park would bring – with

previous businesses having been established and then failed. For some the question remains ‘why would a Scottish Borders national park make people stop, stay and spend money’”. After referencing sources of information to back up our claims about increased economic benefits from tourism, our response continues: “Existing National Parks across the UK and the rest of the world have also published research which shows that the National Park brand is instantly and internationally recognised, and provides permanent advertising, unlike one-off local campaigns, and so brings many more tourists to areas once they have been designated as National Parks. The epithets *instantly and internationally recognised* and *permanent advertising* are precisely what provide the significant added value. For the last several years the Scottish Borders Tourism Partnership and even Visit Scotland have done as much as they can possibly do within limited budgets and lack of comprehensive global reach. The Scottish Borders has the combined and inter-related assets of the landscape and the cultural/historical heritage: all that is needed to convert that into much increased tourism revenues is designation of a Scottish Borders National Park”. But the benefits are not just related to tourism, research shows that National Park designation would help all Borders businesses to thrive.

- 7.7 SLE then referred to a potential conflict:- “there is concern that in some areas tourism and intensively farmed areas could be in direct conflict with one another, with the assumption being that a National Park would bring increased footfall and is likely to magnify existing issues around irresponsible access and livestock worrying”. We respond as follows: “This is an understandable concern which can nevertheless be mitigated against. It has been acknowledged that existing national parks significantly improve way-marking and condition of existing, non-invasive footpaths, and increase the presence of country rangers who can advise both land-managers and walkers on routes - all of which tends to minimise the likelihood of walkers straying from marked and walking routes. The current Scottish Government’s policy of opening up more land to public use means that public access is going to increase whether in a National Park or elsewhere: surely it is better for farmers and landowners in these circumstances to have the assistance of a National Park in regulating this?
- 7.8 The kind of tourist who chooses to visit a National Park is also more likely to be the kind of person, whether urban or rural dweller, who respects the land and those who manage it. It is true that Northumberland National Park is less intensely farmed than the land south of the Tweed in the Southern Borders, but it is also true that therefore there is a higher proportion of grazed farmland and livestock in the Northumberland Park area and livestock in the Northumberland Park area which might raise concerns when increased access to open land might be anticipated. One of the previous chairs of the National Park Authority there is a sheep-farmer who had earlier had similar concerns and was initially sceptical about designation of a Park and benefits to land managers, but quickly became convinced. The most recently designated NP in the UK, the South Downs, is also a farmed landscape, and quite unlike the two current Scottish Parks but physically similar to the Scottish Borders. There have been no reported problems with invasions of hordes of

irresponsible tourists, despite being located on London's doorstep. National Park Authorities can help land-managers to deal with any perceived problem or possible threat by providing signage (both permanent and temporary, eg for the lambing season), rangers and even by passing bye-laws to limit certain types of tourist activity, such as off-road motoring, off-lead dog-walking in certain areas etc. In addition, existing UK National Parks have provided training in both rural skills such as stone-dyking and hedge-weaving, and environmental stewardship - an increasingly vital activity in securing grants/subsidies post-Brexit”.

- 7.9 Another point made by SLE was “Whilst it is acknowledged that Scottish Land & Estates members would be entitled to stand for appointment, concern was expressed at the possibility that 40% of the National Park Authority Board could be comprised of people outwith the area who are not knowledgeable about the Scottish Borders local culture and economic drivers”.
- 7.10 Our response to this may be of particular interest to SBC: “The statute is set out in this way so that a majority of the people making up a National Park Authority are people either nominated by the local authority ( so either counillors or other local people) or elected by local people. The minority (maximum 40%) of the people are understandably required to be people with expertise in relevant specialisms, (eg built or natural heritage) to represent the interests of Scottish Ministers as the main funders, as well as taking account of local needs. It seems to the Campaign Team that SBC would seek to ensure that important stakeholders, such as those representing land managers, were included in their nominated members. Furthermore, as SLE states, its members (and indeed members of NFUS) would be entitled to stand for appointment as one or more of the minimum 20% of members of the Authority elected by the local community.
- 7.11 There is another means by which land-owners and land managers could exert justifiable influence. National Park Authorities must also create one or more advisory groups "with the function of advising the National Park Authority on any matter relating to the functions of the Authority" (National Parks (Scotland) Act 2000). This ties into SLE’s view that integrated land management will be very important in the future (as might be regenerative farming). Because of the nature of land use in the Southern Borders it would seem not only sensible, but also desirable, for a Scottish Borders National Park to create an advisory group on all aspects of land management for the purpose of ensuring that the statutory aim of sustainable economic and social development is particularly applied to land management.
- 7.12 Finally, SLE took the opportunity to touch on boundaries:- “the section contained within the feasibility study on proposed park boundaries and the rationale behind these is unclear and confusing, with the proposed four options difficult to understand – a point also acknowledged by SBNP. SLE suggests greater effort is needed to fully engage with stakeholders to better explain these options.

With regards to the proposed boundary prepared by the SBNP and contained within Appendix 3 of the Feasibility Study several comments were raised by SLE members about the omission of areas of great scenic and historic importance from the boundary. These included areas such as the Ettrick and Yarrow Valleys, Tweed Valley and the Berwickshire coastline (St Abbs Head, Eyemouth)".

- 7.13 Our response begins with an acknowledgement that the Feasibility Study section on boundaries could have been clearer, but goes on to iterate our own preference and the rationale behind it as outlined in our Position Statement:- The Campaign accepts that the section on boundaries in the Feasibility Study (commissioned but not written by the Campaign Team) can be slightly confusing. Nevertheless, we have made it plain in our Position Statement that we favour the former county of Roxburghshire: "The precise boundaries for a Scottish Borders National Park are still to be defined, and will need to take account of e.g. practicality, cost effectiveness, coherence, and relieving pressure on land managers by directing tourists to attractions and facilities. A strong case can be made for concentrating on the Borders' least visited upland landscapes with their fragile communities, wildness and heritage. The Campaign would like to see these areas included but we believe the coherent historical and cultural narrative of the southern Borders means that the whole of the former county of Roxburghshire should be included, with the towns on the boundary i.e. Kelso and Hawick, having the final say on whether they are included or not. Other parts of the Borders have their own opportunities and assets, and arguably face less of a socio-economic challenge, yet they will still enjoy the 'halo' effect of economic benefits rippling out from the proposed Park". However, it is encouraging to note that SLE has proffered arguments for other areas to be included, which may mean that some of its members in those areas recognise the value of designation.

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## 8 Conclusions

- 8.1 Of those 103 responses which either supported or objected, the 81 responses in favour represent 79%, while the 22 objections represent 21%.
- 8.2 **The most conclusive result of this consultation is that there is overwhelming support for a Scottish Borders National Park.**
- 8.3 Respondents were not asked to give reasons for their preference. Nevertheless a significant number of supporting respondents did. Their reasons, and the frequency with which they appeared in supporting responses were revealing. Firstly and remarkably, they covered all of the statutory aims of, and criteria for, National Parks in Scotland. Secondly, they echoed what the Campaign team has proposed as the most pressing aim for a Scottish Borders National Park, ie to boost economic development. Thirdly, they recognise the superior value of NP designation when compared to any less permanent PR/advertising. They also echo what the Campaign has posited as the unique selling point of the Scottish Borders: the strong integration of a vibrant and living cultural heritage with an outstanding landscape.
- 8.4 Five of the objectors (23%) gave no reason, explanation or cogent comment for their objection. The remaining 17 objections include a small number of relatively relevant stakeholders, ie NFU Scotland, Roxburghe Estates, Kelso Community Council and Newcastleton and District Community Council. Most if not all of their concerns, and certainly their *main* concerns, are addressed by documents published by the Campaign well before the Main Issues Report.
- 8.5 Of the 110 mentions of a geographical preference in answer to the second question, 54 mentions (49%) favoured a minimum of the old county of Roxburgh. 14 of the 56 mentions which did not specifically mention Roxburghshire did mention areas which are either in the old county of Roxburghshire or adjacent to it. The eight places which received only one mention included five areas either wholly or partly within Roxburghshire. **It appears that whatever area may be selected for a firm proposal to the Scottish Government it should include Roxburghshire. The Campaign team is quite open to any suggestions which expand upon that area.**
- 8.6/

- 8.6 People living outside the Campaign's favoured area who responded are just as aware of the benefits of NP designation as those resident in that area.
- 8.7 This information should assist in bringing SBC close to making a commitment one way or another to the proposal for a Scottish Borders National Park.

## SBC MAIN ISSUES REPORT - ANALYSIS OF RESPONSES TO THE NATIONAL PARK QUESTIONS

Compiled by the  
Campaign for a Scottish Borders National Park

### Appendix 1 Text of section of MIR referring to National Park Proposal

7.14 The 'Feasibility Study for a proposed Scottish Borders National Park' commissioned by a local campaign group has been submitted to the Council for consideration along with their Position Statement issued in September 2017<sup>2</sup>. The study sets out the background to National Parks in Scotland, the challenges and needs of the southern Borders and seeks to identify the special qualities that would meet the qualifying criteria for the proposed designation. The study also seeks to quantify potential economic benefits, as well as the opportunities for landowners and tourism. The study sets out a number of options for a boundary to the park and also the possible governance arrangements, legislative powers it would have and what the operating costs would be. The study can be viewed on the following link: [www.borders-national-park.scot/feasibility\\_study.htm](http://www.borders-national-park.scot/feasibility_study.htm)

7.15 The Council considers there is merit in posing a question on the proposition for a National Park, its possible boundaries and operational model through the Main Issues Report. This statutory process, which is also being used by Argyll & Bute Council to investigate their proposals for a National Park, would enable the Council to better gauge the level of public support for the proposals, the attitude of key stakeholders, to test the key assertions being made in the campaign group's submission regarding proposed benefits and to investigate further what would be involved in the establishment of a park. It is only once this work has been completed that the Council will be in a position to determine whether it can support the establishment of a National Park in the Borders.

7.16 The designation of a National Park is ultimately a matter for Scottish Ministers following an assessment and recommendation by Scottish Natural Heritage. Whilst the support of the Council for such a proposal would be a material consideration for Scottish Ministers it is unlikely to be the key determining factor in their final decision.

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<sup>2</sup> Note : the Position Statement was published online in January 2018 following the publication of the Feasibility Study in September 2017.