

Appendix 5, Annex 1: Consultation Representations to Draft SPG: Local Landscape Designations

Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
Support General Support	Infinis	- In general, Infinis find this (methodology) to be robust and comprehensive...Infinis consider that the LLDR draws appropriately on the 2005 SNH/HS Guidance, and uses transparent criteria to construct a logical decision making framework to arrive at the identification and description of the SLAs.	Support noted	Support noted
	John Muir Trust	- The Trust fully supports the eight SLAs proposed within the consultation document, all of which are high quality landscapes deserving effective care and protection. The Three Brethern are some of the finest wild land in the south of Scotland. The Borders is fortunate to have such a precious natural asset, valuable in its own right, vital for eco-services, carbon sequestration and biodiversity, but equally valuable to the visitor economy. The inclusion in the proposed SLAs of the middle stretches of the Tweed between Peebles and Kelso and the landscapes between and including the lower Teviot and Jed and their	Support noted	Support noted

		<p>tributaries is also very welcome. These landscapes, too, are of great importance as key elements in how people see and experience the Borders</p> <ul style="list-style-type: none"> - ...it is now widely recognised that a patchwork of relatively small but protected areas is ineffectual, leading to a steady deterioration in the quality of these isolated areas, despite being designated...the Trust commends the draft SPG for recognising this requirement, and proposing a series of inter-connected candidate SLAs as a result. 		
	Philip and Finoula Kerr	<ul style="list-style-type: none"> - Scottish Borders Council is to be commended for carrying out the Review of Landscape Designations to put the protection of the best of our scenic assets onto a more defensible basis, and for proposing new areas for designations. 	Support noted	Support noted
	Jane Douglas	<ul style="list-style-type: none"> - I thoroughly approve of the Scottish Borders Council's move to protect our wonderful landscape. It is all too easy when one lives and works in a beautiful area to take it for granted, so anything that goes towards protecting our stunning countryside for future generations and for the countless 	Support noted	Support noted

	Malcolm Dickson	<p>tourists who visit the area and love it, can only be applauded.</p> <ul style="list-style-type: none"> - Firstly, I wish to commend the Council in taking the important step of progressing the designation of landscape beyond the terms of the pre-existing Areas of Great Landscape Value. I am certain that this is a significant move in improving the Council's ability to balance its responsibilities to protect its valuable asset – the previously undervalued scenic beauty and ecology of the Scottish Borders – against the accepted need to promote economic development. 	Support noted	Support noted
	Walkerburn and District Community Council	<ul style="list-style-type: none"> - We welcome the fact that the proposals are underpinned by a considerable body of independent expert assessment, which lends credibility to the objectivity of the proposals. - The draft SPG is well written and the intent is clear to non-experts. 	Support noted	Support noted
	Dr David Long	<ul style="list-style-type: none"> - In general I think this is an excellent study and I strongly support the policy of defining more clearly landscape designations in the Scottish Borders. The landscape is one of our most 	Support noted	Support noted

		<p>important and valuable assets and in the past, protection has sometimes been inadequate leading to unfortunate developments in the Borders...local designations are very important and the lack of national designations of our landscape makes it even more important that this SPG goes ahead.</p>		
	Scottish Renewables	<p>- We fully support Scottish Borders Council's initiative to review the Areas of Great Landscape Value due to their lack of written justification and the time elapsed since their initial designation. We also support the decision to refer to AGLVs as 'Special Landscape Areas', to be in line with SNH and HS guidance. Furthermore, we are encouraged by the fact that the overall area (in Km²) of the proposed SLAs is to be no greater than covered by the existing AGLVs</p>	Support noted	Support noted
	Historic Scotland	<p>- We have reviewed the brief on behalf of Historic Scotland and welcome the preparation of the guidance which outlines the approach to selection of new Local Landscape Designations and outlines the relevant regulations and draft policies in development management</p>	Support noted	Support noted

		<ul style="list-style-type: none">- We note that a key purpose of the SPG is to undertake a review of current Areas of Great Landscape Value and consider better the full range of landscape areas of quality within the Council area which are not currently part of the current AGLV designations.- We welcome the systematic approach taken for sifting and selecting 8 new SLAs...In particular we welcome that The Statement of Importance which accompanies each proposed SLA. This will be particularly helpful in the consideration of development management processes, because their inclusion in the draft policies will be used to evidence decisions taken		
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Cheviots and Carter Bar</p> <p>1.) Carter Bar</p>	<p>Philip Mason; Jen & Ron Garrod Lintott; Philip & Finoula Kerr; Alan Bailey; Susanna Rickett</p> <p>Philip and Finoula Kerr; Susanna Rickett</p> <p>Alan Bailey, Malcolm Ouldcott, Jed Valley</p>	<ul style="list-style-type: none"> - It is a viewpoint of world renown and undoubtedly the most spectacular 'gateway to Scotland'. - For this reason alone, and given the international importance of the view, I feel that, even if it requires the creation of a different set of criteria, a way must be found to include the whole of the Carter Bar view - Carter Bar, or the view from it, is not reflected within the SLA designations as having protected status. It is clearly mentioned as being a view of significance, but because of the LCU divisions it has been incorporated into a large LCU, but is very much at the fringe of it. - LCU 18...Falla could score higher for both Views and Scenic characteristics than it currently does and if both were accorded the highest rating to reflect the influence of Carter Bar it would reach the top twenty LCU's - The view crosses several LCU's and it can be argued that although this has been clearly reflected in the SPG 	<p>It is agreed that Carter Bar and associated landscape play an important role as a 'gateway to Scotland' and that the northward panorama is central to this. In addition there should be consideration of cross-boundary continuity of designation (with Northumberland National Park).</p> <p>The responses to Issue 1.) in association with other responses in this section led to the recommendation stated.</p>	<p>Extend the proposed Special Landscape Area (SLAs) westward, incorporating the Roman Camps, Philip Law, Leithope Forest and crossing the A68 to Lethem therefore incorporating Carter Bar and increasing the continuity with the Northumberland National Park.</p>

	Community Council	on wind energy, it has not been treated in a similar way here, and does not afford protection from other large scale developments.		
2.) Cheviot Foothills cSLA (Jed Water, Falla etc)	Philip Mason; Susanna Rickett;	- Cheviot Foothills SLA is of at least the same quality as the two Borders' NSAs evidenced because part of the same Cheviot massif, on the English side of the border is designated as a National Park.	The purpose of the LLDR was not to review National Scenic Areas (NSA); this would need to be done by Scottish Ministers. It is the case that cross boundary issues should be considered. The proposed SLA boundary has been extended westward to incorporate more of the Cheviot Foothills as described for Issue 1.) Carter Bar.	Accept recommendation to extend cSLA boundary westward
	Philip Mason	- inclusion of the Cheviot Foothills in a Review which uses criteria appropriate <u>only</u> to other parts of the Scottish Borders is inappropriate. The Cheviot Foothills are part of the distinct Cheviot hillscape	The purpose of the LLDR was to identify SLAs for the whole of the Borders. To fit with national guidance and ensure the designation of SLAs was defensible the Borders had to be treated as a whole. The proposed SLA boundary has been extended westward to incorporate more of the Cheviot Foothills as described for Issue 1.) Carter Bar.	Accept recommendation to extend cSLA boundary westward
	Philip Mason	- western boundary of the proposed	The LCU UP18 Falla Group did	Accept recommendation to extend

	<p>David Leggate; Christian Curtis; Neil Bryce</p> <p>Susanna Rickett</p>	<p>SLA appears to simply follow the line of the Hindhope- Hownam- Morebattle road. A study of a large scale map shows that the detailed hillscape topography extends well beyond the road, at the very least to the old AGLV boundary, and arguably, using criteria applied in the Northumberland National Park, to the A68</p> <p>- Reduction in size of SLA due to LCU UP18 'Falla Group' being lower quality in evaluation stages is a serious error in judgement</p> <p>- "Wildness". This is ranked as medium (not even high!) presumably partly because of the unsympathetic blocks of conifers. It is hard to think of any other reason as this area contains many extremely wild areas e.g. the upper Kale Water valley. This strikes me as perverse. Much of the landscape is very similar to that in the Cheviot foothills to be designated an area of SLA and differs only in that the hills are slightly smaller and lack the rocky outcrops at their summits.</p>	<p>not score as highly as UP17 Cocklaw Group and even with a re-examination of the scoring this remained the case and so affected where the boundary was drawn. In deciding boundaries efforts were made to look for a logical delineation in the landscape, roads were a good choice due to their permanence. The proposed SLA boundary has been extended westward to incorporate more of the Cheviot Foothills as described for Issue 1.) Carter Bar.</p> <p>Relative wildness is restricted to the eastern areas, while the western part of the LCU is crossed by the A68 and cannot be considered remote.</p>	<p>cSLA boundary westward</p> <p>No further action.</p>
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<p>3.) Land to the south between Teviot Valleys cSLA and Cheviot Foothills cSLA</p>	<p>Philip Mason</p> <p>T.G.O Douglas; Mrs MM Asquith; Jane Douglas</p> <p>Malcolm Ouldcott for Jed Valley Community Council</p> <p>John Muir Trust</p>	<ul style="list-style-type: none"> - The unprotected corridor (between Teviot Valleys/Cheviot Foothills) if inappropriately developed, not only has the potential to erode the landscape and amenity quality of the adjacent SLAs, but also to impact adversely on the views from Carter Bar. - the area to the south east between the A6088 and the A68, taking in the Carter Bar, should be included, as should the area to the east, Oxnam Water, linking the Teviot, Jed and Rulewater area to the Cheviot Foothills area. - the proposed SLA (Teviot Valleys), at its southern end, leaves a corridor about a kilometre wide between Chesters and Camptown which lies between the Teviot Valleys SLA and the Carter Bar area of significant protection. This oversight should be rectified by extending the Teviot Valleys SLA southeastwards between the A68 and the A6088 roads, as far as the Carter Bar. - ...the assessment that this is an area with 'Low' value to the 'Tourist Economy' is misleading. For those arriving at Carter Bar the view eastwards towards Morebattle is very fine and an essential part of that 	<p>It is the case that the LCUs UP18 Falla Group and UF20 Oxnam did not score highly enough to be considered as/part of a SLA, this remained the case despite a re-examination of the scoring. The proposed SLA boundary has been extended westward to incorporate more of the Cheviot Foothills as described for Issue 1.) Carter Bar.</p>	<p>Accept recommendation to extend cSLA boundary westward</p>
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		<p>experience of crossing the border into the beautiful and dramatic Borders' landscape</p> <ul style="list-style-type: none">- These foothills also form the foreground to substantial sections of St Cuthbert's way and the Pennine Way. These routes are high quality walking routes which contribute considerably to the prosperity of communities from Melrose to Yetholm and beyond.		
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Pentlands</p> <p>4.) Cross Boundary SLA/AGLV issues</p>	<p>Friends of the Pentlands; Pentland Hills Regional Park; Professor Elizabeth Meehan; Roger Oakes; Colin Kilpatrick; South Lanarkshire Council; Midlothian Council; Quarries Action Group; West Linton Community Council; Carlops Community Council; Cynthia Hunter; Mr T.R.M Montgomery; Jim Pratt; Ms Diane O'Neil; Anna & Peter Woolverton; A.McL.Jenkins; Rosemary and Peter Eydes; Ms G Small; North</p>	<p>- Pentland Hills area is covered by 5 Local Authority areas, the current coherent planning policy protection of this regionally significant landscape area must be continued</p> <p><i>The above is a summary of the general theme of the comments listed adjacentl</i></p>	<p>The cross-boundary issues identified in representations were considered to be important additional information. In the re-examination of the findings this information along with scoring changes resulted in the justification for a proposed Pentlands Hills SLA. The responses to Issue 4.) in association with other responses in this section led to the recommendation stated.</p>	<p>Accept recommendation that Pentland Hills should become a proposed SLA.</p>

	<p>Tweeddale Paths; Fiona Anderson; Carol Kilpatrick; Mary and Rennie McElroy; Cathleen Baldwin; Dr Alan Crossley; Yvonne Crossley; Mrs Jane Dickson; Alison Wilson; Anna O'Connor; Peebles Community Council; Archie Hunter; John Muir Trust; Jon Laffan; JPA Parrott; Raymond Turnbull; Barbara and Richard Jones; Peter Raine;</p> <p>West Lothian Council</p>	<p>- You will be aware that the SNH and HS guidance on proposed SLAs specifies several criteria that includes "Identity and Coherence" where cSLA can cover recognisable landscape units such as upland hills like the Pentland Hills, that extend across administrative boundaries.</p>	<p>Please see the response to Issue 4.)</p>	<p>Accept recommendation that Pentland Hills should become a proposed SLA.</p>
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	SNH	<ul style="list-style-type: none"> - Consequently, we would ask that SBC reconsider their treatment of the south east part of the Pentland Hills range that occurs within your administrative area and promote an additional 9th SLA 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 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 	Please see the response to Issue 4.)	Accept recommendation that Pentland Hills should become a proposed SLA.
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	South Lanarkshire Council	<p>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)</p> <p>- 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</p>	Please see the response to Issue 4.)	Accept recommendation that Pentland Hills should become a proposed SLA.
5.) Scoring of UP1 Western Pentlands - Enjoyment	Hugh Kilpatrick; Rosemary & Peter Eydes; Mary & Rennie McElroy; Raymond Turnbull; Sue &	- Enjoyment of the hills has not been taken into account sufficiently. <i>(the above is a summary of the comments listed adjacently)</i>	In the original LLDR rankings "enjoyment" scored very high, the best possible ranking, and this remains the case in the rankings after re-examination of the scoring by the Consultants.	No further action

	<p>Steven Allan; Russel & Carole Day; D & M. Dingle</p> <p>Pentland Hills Regional Park</p> <p>Carlops Community Council</p>	<ul style="list-style-type: none"> - 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. - The Borders section of the Pentland Hills tends to be quieter than the busier northern end of the hills but they provide an important recreation amenity for a range of people, such as walkers, runners and horse riders. It is particularly important to have the opportunity to experience wilderness so close to a city the size of Edinburgh 	<p>Please see the response to Issue 5.)</p> <p>Please see the response to Issue 5.)</p>	<p>No further action.</p> <p>No further action.</p>
6.) Scoring of UP1 Western Pentlands-Tourism	<p>Hugh Kilpatrick; Anna and Peter Woolverton; A.McL.Jenkins; Jon Laffan; Carol Kilpatrick; D & M Dingle; Anna O'Connor;</p>	<ul style="list-style-type: none"> - The Pentlands do not score highly on the Tourist economy criterion despite being located between and accessible from, both Edinburgh <u>and</u> the urban conurbations to the west- nor is it recognised that the A702 is the main route into Edinburgh from the south. 	<p>After the re-examination of the scoring Tourism remained at medium. It is considered that the Pentlands are less central to the tourist economy of the Borders.</p>	<p>No further action.</p>

	<p>Elizabeth and Gordon Hamilton; Cynthia Hunter; Mrs Fraser Harris; Mrs Fiona Anderson; Mary and Rennie McElroy; K Crawford; Anna Milne</p> <p>Pentland Hills Regional Park</p> <p>Carlops Community Council</p>	<p><i>(the above is a summary of the comments listed adjacently)</i></p> <ul style="list-style-type: none"> - 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. - We get a lot of visitors in Carlops who enjoy the opportunity to get into the hills. No doubt West Linton experiences a similar input in numbers due to the closeness of the hills. Although the SBC focus is the key tourist centres in the county there is a major city only 16 miles from Carlops which attracts people from around the world. A significant number of them visit the hills even as far south as Carlops and are a boost to the pub and the local B&Bs. 	<p>Please see the response to Issue 6.)</p> <p>Please see the response to Issue 6.)</p>	<p>No further action.</p> <p>No further action.</p>
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<p>7.) Scoring of UP1 Western Pentlands- Cultural Qualities</p>	<p>Fiona Anderson; Alan Crossley; Yvonne Crossley; D and M Dingle; Anna O'Connor; Elizabeth and Gordon Hamilton;</p> <p>Friends of the Pentlands</p> <p>Pentland Hills Regional Park</p>	<ul style="list-style-type: none"> - Surprised that the consultant's report stated that the Scottish Borders area of the Pentlands was low on cultural qualities - 2nd Millenium BC burial cairns...thought to mark an important prehistoric route linking Upper Clyde valley with Forth Estuary. - Roman Road, though to have been constructed AD80. Later forming part of pilgrimage route from Edinburgh to shrine of St Ninian, who brought Christianity to Scotland. Siller holes on the Road...fragments of medieval pottery leather, textiles and other artefacts... - Cauldstane Slap...associations with the Covenanting movement and the Old Drove Road...was an important route for driving cattle - The Pentland Hills have an interesting history and association with our cultural past. Literary 	<p>The representations provided new information detailing the cultural qualities of the Pentlands and re-examination of the scoring took this information into account and the ranking was changed from poor to high. This played a role in providing the justification for inclusion of the Pentlands as a proposed SLA</p> <p>Please see the response to Issue 7.)</p> <p>Please see the response to Issue 7.)</p>	<p>Accept change of improved scoring.</p> <p>Accept change of improved scoring.</p> <p>Accept change of improved scoring.</p>
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	<p>Archie Hunter; West Linton Community Council</p> <p>Professor Elizabeth Meehan</p>	<p>associations for example include Allan Ramsay and Robert Louis Stevenson</p> <ul style="list-style-type: none"> - ...there are serious omissions from the Western Pentlands' cultural qualities, namely the Roman Road and the old drove road over the Cauldstane Slap which traverses the Pentlands. These significant historic roads are very visible and extremely popular foot paths. - ...had the review team done such research, they could not possibly have said of the 'Attributes' of the current AGLV that: 'A few minor roads and footpaths cross the area'. That this demonstrates a complete misunderstanding of the significance of these roads and footpaths is clear even from a cursory reading of...History of Peebleshire, edited by James Walter-Buchan and the Rev. Henry Paton (and) The Call of the Pentlands: A land of Glamour and Romance by Will Grant. These books make visible much of what the review team describe in connection with previous settlements, industries, literary associations, church history, and the important road networks. 	<p>Please see the response to Issue 7.)</p> <p>Please see the response to Issue 7.)</p>	<p>Accept change of improved scoring.</p> <p>Accept change of improved scoring.</p>
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		<ul style="list-style-type: none"> - ...also matters of artistic significance...areas around Carlops are central to the work of two successful contemporary painters...Darren Woodhead, his book prints of the Carlops and North Esk have received critical acclaim; Victoria Crowe, whose study of Jenny Armstrong as a working shepherd in the Pentland foothills have acquired something of an iconic status - (Cauldstane Slap)...the road had existed for a long time. It was travelled on by Mary Queen of Scots in 1565 as far as Biggar. - The Pentlands (UP1 and part of the related UP23) were the scene of significant matters of church history before and after the reformation. - (Literary and artistic associations)...John Forbes and, later, Robert D.C.Brown of Newhall were patrons of the arts and men of letters themselves. Allan Ramsay and George Meikle Kemp both had close associations with Newhall. Also, the North Esk's inspiration for poets (Drummond Hawthorne and Walter Scott)...It is well known Robert Louis Stevenson enjoyed the Pentlands in general...Hugh MacDiarmid...lived at Brownsbank, 		
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		Candymill from the end of the Second World War until his death in 1978.		
8.) Scoring of UP1 Western Pentlands- Scenic Qualities/ Views	Pentland Hills Regional Park; Carlops Community Council	- The views of the hill range to the west from the A702 travelling south are of a high quality	In light of the representations the scoring for UP1 Western Pentlands was re-examined; for 'Scenic Qualities' and 'Views'. Both criteria were previously scored as high and were triple-weighted. After re-examination it was found that the 'scenic qualities' criteria had been applied consistently. However it was considered that the 'Views' criteria should be scored as very high and this played a role in justifying the Pentlands being put forward as a proposed SLA	Accept change of improved scoring for 'Views' criteria
	Professor Elizabeth Meehan	- ('scenic qualities')... I cannot accept that UP1 has only 'some pleasing features' and/or 'dramatic contrasts'. I am convinced that it merits 'very high'. - UP23 may rightly merit the score of 'medium' for parts of the route of the A702 but, beyond the Scottish Borders boundary, there are spectacular views over Edinburgh, Arthur's Seat, the river Forth, and to Traprain and Berwick Law. (('views'))... With respect to UP1, I think	Please see response to Issue 8.)	Accept change of improved scoring for 'Views' criteria

		<p>there is a case for 'very high'. The LLDR does not mention Mendick Hill (see 3 Settlement setting) of which there are spectacular views for miles around. Its aspect as seen from West Linton Golf Club is truly superb. Try having lunch in the clubhouse one day and see for yourself!</p> <ul style="list-style-type: none"> - The views from the Cauldstane Slap, through which passes the important drove road referred to at 1a above, are also spectacular, providing vistas for miles to the north and south along the old transport route. 		
9.) Risk of inappropriate development	<p>Pentland Hills Regional Park; Mrs Fraser Harris; A.McL.Jenkins; Peter & Rosemary Eydes; North Tweeddale Paths; Mary and Rennie McElroy; Dr Alan Crossley; Yvonne Crossley; D and M Dingle; Barbara and Richard Jones; Peter Raine; Anna O Connor; Quarries Action</p>	<ul style="list-style-type: none"> - 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 - Loss of this important landscape designation may undermine the long term conservation of the Pentland Hills as an important landscape feature <i>(the above is a summary of the comments listed adjacently)</i> 	<p>The Council would presume against development with an adverse impact on the landscape whether in a SLA or not. However, SLA designation gives additional protection and potential to improve the landscape.</p>	<p>Accept recommendation that Pentland Hills should become a proposed SLA.</p>

	<p>Group (QAG); Mrs A.W McIntosh; Cathleen Baldwin; Sue & Steve Allan</p> <p>Matthew and Monica Shaw;</p>	<ul style="list-style-type: none"> - We are flabbergasted that SBC should be even considering removing the AGLV designation. It flies in the face of all common sense when our few remaining 'wild' areas are already under constant threat of development. All we can assume is that SBC is under such intense pressure from commercial organisations, such as wind farm companies and mining companies. You are failing to show leadership and failing to represent the people of the Scottish Borders (and further afield) who actually value to keeping areas undeveloped - Is there no end to this monstrous profligacy of self interest that continually overrides and disregards the cost to public welfare and natural wellbeing 	<p>The Local Landscape Designation Review was an independent study undertaken with a robust methodology by the Consultants employed. Following the Consultation period additional evidence provided in representations has influenced a re-examination of the scoring and as a result the Pentland Hills has been put forward as a proposed SLA</p>	<p>Accept recommendation that Pentland Hills should become a proposed SLA.</p>
<p>10.) Boundary of current AGLV</p>	<p>Roger Oakes; Colin Kilpatrick; QAG; Anna</p>	<ul style="list-style-type: none"> - The southeast boundary of the present Scottish Borders/Pentlands AGLV is well defined by the route of 	<p>The A702 is a logical boundary for the proposed Pentland Hills SLA because it allows for views</p>	<p>Accept recommendation Pentland Hills should become a proposed SLA, with the A702 as the eastern</p>

	O'Connor	a Roman Road, or rather the distinct track either on the route of that historical feature, or close to it, an even better demarcation would be the A702 trunk road	of the Pentlands from the road and the potential for improvements of the somewhat degraded landscape of the flanks of the hills.	boundary.
11.) General Pentlands	Colin Kilpatrick	- Table 6.2 does not list the Pentland Hills AGLV within West Lothian	The Pentland Hills AGLV is incorrectly referenced as "Almond and Limehouse Valleys AGLV" in Table 6.2	Change Table 6.2 in the updated LLDR/SPG
	Colin Kilpatrick	- Did the consultants in their fieldwork walk to the tops of Craigengar, Wolf Craigs, the West Cairn and the Cauldstane Slap to appreciate the views and landscapes from these Pentland Hills within Scottish Borders? If so, during which month and year was the fieldwork undertaken?	In this case the Consultants did not walk to the summits mentioned. However extensive field-work was carried out and this was validated by the Steering Group. In addition representations on views resulted in the ranking changing from 'High' to 'Very High' this played a part in justifying the Pentlands Hills as a proposed SLA	Accept change of improved scoring for 'Views' criteria
	Colin Kilpatrick; West Linton Community Council; Mrs Susan Oakes	- Did they appreciate the huge importance to pink-footed geese of the West Water reservoir ramsar site?	Westwater SPA/Ramsar site is protected from inappropriate development by international legislation and Council policy NE1 International Nature Conservation Sites. However the Pentlands has been proposed as a SLA	Accept recommendation that Pentland Hills should become a proposed SLA.

	<p>Archie Hunter; Susan Oakes; Cynthia Hunter; Elizabeth and Gordon Hamilton</p>	<p>- The Pentlands are the “lungs” of Edinburgh and of a number of small towns and villages on either side and are an important amenity for daily recreation and exercise for local residents. The Borders are truly blessed with wonderful scenery, and in that context the Pentland Hills are not as grand and scenic as some of the sweeps in the Southern Uplands. But magnificent as many of the Borders Hills are, they do not have this close association with our Capital City, and are certainly not so frequently used and visited. In other words the Pentlands are a “Special Case” and should be considered as of national rather than regional importance</p>	<p>The responses to Issue 4.) in association with other responses in this section led to the recommendation stated.</p>	<p>Accept recommendation that Pentland Hills should become a proposed SLA.</p>
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Teviot Valleys SLA</p> <p>12.) Support for SLA status</p>	<p>Marion & Julian Livingston; Craig & Pauline McAdam; Mr Keith Breckby; Jen & Ron Garrod-Lintott; Sarah Glendinning; Jane Douglas; Annabelle Skinner; David Skinner; Innerleithen & District Community Council; Prof AW & Mrs DD Illius; Jeremy Snodgrass; TGO Douglas; Mrs MM Aquith; Mr D.R Walmsley; Christian Curtis; David Leggate</p> <p>Malcolm Dickson</p>	<p>- We are writing to fully support the proposal to give the beautiful Teviot Valley SLA status <i>(the above is a summary of the representations listed adjacently)</i></p> <p>- I wish to commend the Council in</p>	<p>Support noted</p> <p>Support noted</p>	<p>Support noted</p> <p>Support noted</p>

		taking the important step of progressing the designation of landscape beyond the terms of the pre-existing AGLV. I am certain that this is a significant move in improving the Council's ability to balance its responsibilities to protect its most valuable asset- the previously undervalued scenic beauty and ecology of the Scottish Borders- against the accepted need to promote economic development.		
13.) Land between Teviot Valleys cSLA, Ettrick and Yarrow Confluences cSLA and Eildon and Leaderfoot NSA	Marion & Julian Livingston	- Consider joining up the NSA of the Eildons and Leaderfoot with a much enlarged Teviot Valley SLA that also takes in the beautiful Alewater Valley. This would help to safeguard some of the Scottish Borders' most stunning views. It would also help to conserve and safeguard the future of the wonderful diversity of flora and fauna in the small hills, woodlands, rivers, valleys and farmland typical of this largely unspoilt part of the country.	It is considered that UF22 Minto Hills and RV71 Ale Water do not score highly enough, even after re-examination of scoring, to be included as a SLA. UF33 is the highest scoring LCU however this is related to the areas contained in the NSA. The Council will presume against development with an adverse impact on the landscape whether in a SLA or not and there is a series of Natural Environment policies which help to conserve the features listed.	No further action
	Marion & Julian Livingston; Prof AW & Mrs DD	- Northern boundary of the proposed Teviot Valley SLA be extended to include Troneyhill: important in its	As a part of the re-examination of the findings following consultation representations it	Accept extension of the north western boundary along the disused railway line running north

	<p>Illius; Mike & Catherine Robinson; Malcolm Dickson; Mr D.R Walmsley; Gerald & Angela Goldsburgh;</p> <p>Minto Hills Conservation Group</p>	<p>own right and on the same skyline as the Minto Hills; border follows the old railway line from Minto Kaimes-Belses-Pinnacle, at which point it could follow the road to Ancrum;</p> <ul style="list-style-type: none"> - This would provide: <ul style="list-style-type: none"> a. a clear physical boundary b. removal of the necessity to rely on commercial woodland to act as a screen for turbines and other masts c. protection for Troneyhill (OS Sheet 73 GR576230) - Our reasons are: to protect the high ground and ridges mentioned above and their associated rolling valley farmland to the NW, which can be seen for many miles and from many settlements; to make use of a well known and established man made boundary (the old railway line) which offers an uncomplicated straight edge to the boundary at this point; to avoid reliance on commercial stands of trees and woodland which are temporary and upon felling will lose all significance <p>If the disused railway line is considered not suitable, please consider instead, in the bottom of the valley, just a few hundred yards to the</p>	<p>was considered that the boundary change proposed was a logical change. Therefore it is proposed that the Teviot Valleys cSLA should increase in size, with the revised boundary following the railway line further to the north east and then along the road past Rawflat to just past Bloomfield (heading south east)</p> <p>Please see the response to Marion & Julian Livingston et al under Issue 13.)</p>	<p>east and then to Bloomfield, running south east.</p> <p>Accept extension of the north western boundary along the disused railway line running north east and then to Bloomfield, running south east.</p>
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	Save Scott's Countryside	<p>north west, runs the Jordan Burn, almost parallel to the railway line, and this too would make a suitable and distinct natural boundary.</p> <ul style="list-style-type: none"> - Do not understand exclusion of the area from the moorland and wooded burns. Its inclusion would give added protection to the Eildon and Leaderfoot NSA. 	<p>The LCU UF33 Eildon Hills is the highest scoring LCU assessed. However it is considered that the Eildon Hills themselves are particularly prominent and distinctive, but they occupy only a very small part of this relatively extensive LCU. The remainder of the LCU is less obviously iconic, though still with value.</p> <p>The argument of protecting the setting of the NSA is accepted however development proposals which would have an adverse effect on the setting of the NSA would be presumed against by the Council and it is therefore unnecessary to try to 'fit' this land into a SLA.</p>	<p>No further action</p>
	Save Scott's Countryside	<ul style="list-style-type: none"> - (that NSA)...is under continuing threat and we are concerned that the proposed SLA does not, unlike the existing AGLV include the NSA. We believe that Local Designations 	<p>Designation as an SLA and a NSA would not offer additional protection. The Eildon & Leaderfoot NSA is subject to stringent protection through</p>	<p>Accept the split of National Scenic Areas and Special Landscape Areas to better articulate the policy approach to the respective designations.</p>

		should include... NSA's to demonstrate approval, commitment and a sense of co-ownership of national designations.	Local Plan policy EP1, National Scenic Areas. It is considered that by having the two types of landscape designation stand alone there is greater clarity in Policy approach	
14.) Teviot Valleys SLA: Forces for Change	Mike and Catherine Robinson; Malcolm Dickson; Minto Hills Conservation Group; Professor AW and Mrs DD Illius; Alan Bailey; Philip and Finoula Kerr Minto Hills Conservation Group	<ul style="list-style-type: none"> - Potential wind farm proposals are not listed as a force for change as they are, for example, under the Tweedsmuir Uplands SLA. This should be amended to make sure that it is also included in the Teviot Valley SLA which is currently under threat from numerous turbine investigations and applications - We would also suggest that the phrase 'Potential Wind Turbine Proposals' be used instead of 'Potential Wind Farm Proposals' to reflect the possibility that a single or small number of wind turbines could have a significant impact on the landscape 	<p>Considered wind farms are an appropriate force for change in the Teviot Valleys.</p> <p>It is logical to use "Potential Wind Turbine Proposals" to reflect the possibility of cumulative effect of a number of individual turbines.</p>	<p>Accept amendment of Forces for Change for Teviot Valleys to include wind farms in updated LLDR</p> <p>Accept the use of the term "Potential Wind Turbine Proposals" in updated LLDR</p>
15.) Comments on LCU RV71 Ale Water	Lilliesleaf, Ashkirk and Midlem Community Council	<ul style="list-style-type: none"> - Wildness- suggest a higher rating, areas to south and west of Ashkirk when viewed from the higher ground looking south west have wildness 	The scoring was re-examined by the Consultants where it was considered additional information had been supplied in	Accept positive change in scoring for 'Cultural Qualities', 'Views' and 'Tourist Economy'.

		<p>character. They give uninterrupted views with no signs of human habitation apart from the odd farm house which fits perfectly into its landscape. Certainly walks across this SW area feel very wild.</p> <ul style="list-style-type: none"> - Enjoyment- suggest a higher rating. The area has...paths such as The Borders Abbey way and many locals know walks and core paths the scenic quality of which is on a par with anywhere in the UK. There are 2 golf courses...riding school at Dryden... many bridal ways...clay pigeon shooting...Pheasant shoots throughout the area...fishing locks including trout fishing...car rallies, motor bikes and cyclists frequently use the minor roads in the area. The enjoyment of all these activities is increased by the high quality of the scenery - Cultural Qualities- agree with high rating. Amazed at the omissions of the Will. H Ogilvie cairn and memorial seat on the hill road to Robertson (B711). - Settlement Setting- Midlem a conservation village with medieval routes is one of the highest villages in the Borders. - Views- suggest a high rating. Those 	<p>the representations. As a result the Cultural Qualities and Views criteria were changed from medium to high (the latter being triple weighted). The Tourist Economy criteria was changed from low to medium.</p> <p>In addition it was considered that as a settled river valley there was limited wildness character and that the enjoyment of the landscape was appropriately ranked as high.</p> <p>The total ranking score changed from 41 to 45 and this was not sufficient to be incorporated into a proposed SLA</p>	
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	Dr Walmsley	<p>of us that live here constantly see open wide views as we go about our daily business...The villages are in the valleys but many houses have far reaching views from windows. The minor roads offer spectacular views. For example the B711 road from Ashkirk to Roberton has got to be by any criteria one of the most beautiful in the Borders. The Ashkirk to Ettrickbridge road offers views towards Bowhill and Selkirk going west. Open views to the hills going east. A few steps off this road to higher ground will offer unspoilt open views to the south. The top of Riddall estate has views over the whole area.</p> <ul style="list-style-type: none"> - Tourist Economy- strongly contest the low rating given. Contribute highly with scenery and walks. Point out the hill road to Roberton and the Will Ogilvie cairn and seat... many holiday cottages in our area...many tourists that use us as part of the wider area - ...it would be ideal, if as a tributary of the Teviot and surrounded by some very picturesque countryside the Alewater Valley might be considered for inclusion as part of the Teviot Valley SLA - 	Please see the response for Issue 15.)	Accept positive change in scoring for 'Cultural Qualities', 'Views' and 'Tourist Economy'.
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16.) Clarification of Teviot Valley cSLA methodology	SKM for Infnis	- many of the constituent LCUs included in the Teviot Valleys cSLA appear to fall significantly out with the 1/3 rule	Lower scoring areas were included to help form coherent SLA areas. The methodology states <i>“Where there is a lack of obvious boundaries, it has occasionally been necessary to move outwards and to include areas of lower merit, rather than to move inwards and reduce the area of higher merit landscape included within the cSLA, particularly where this has an impact on the integrity of the area in question”</i> (Para 3.30, LLDR)”	No further action
	SKM for Infnis	- Unclear as to which features the cSLA is attempting to offer the highest level of protection to...it would be helpful to clarify the relative importance, and by inference degree of protection, to be placed on the landscapes within the valleys <i>per se</i> , as distinct from the containing boundary ridges.	The Statement of Importance makes clear that the hills and ridges within the Teviot Valleys SLA... are central to this cSLA. It is not possible to regard the valleys as separate from the ridges which visually contain them, and the SLA has been defined on this basis	No further action.
	SKM for Infnis	- Clarification should be offered to assist in understanding the degree to which views from the specific hill summits and other landmarks identified in the Statement of	The purpose of SLA designation is to protect defined areas of landscape, rather than the complete extent of views from individual locations.	No further action.

	SKM for Infinis	Importance would be protected.		
	SKM for Infinis	- <i>Policy A Boundaries</i> - low resolution of the figures to which this refers, make it difficult to identify individual features and relate these to the 1:50,000 OS source.	It is hoped with the introduction of the new website that this problem will be rectified. Any requests for high quality PDFs or paper print-outs were met.	Place good quality maps on the website
	SKM for Infinis	- <i>Policy B Development Management</i> - request clarification on the omission of reference to the sub header of Management Recommendations when listing the elements of the Statement of Interest which will be used to evidence decisions.	Policy B Development Management should reference "management recommendations".	Ensure Policy B references "management recommendations"

Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
Tweed, Ettrick & Yarrow Confluences and Tweed Valley cSLAs 17.) Support for SLA status	Broadmeadows Action Group;	- ...welcome the fact that the proposals are underpinned by a considerable body of expert assessment provided by a body independent of the Council. This	Support noted	Support noted

		<p>assessment, in helping to inform the Council's proposals, endorses both the credibility and the objectivity of the proposals themselves</p> <ul style="list-style-type: none"> - In terms of the proposed Tweed, Etrick and Yarrow Confluences SLA, we greatly welcome the fact that this takes in an important area above Yarrowford to the west of the existing AGLV 		
	Jeremy Snodgrass	<ul style="list-style-type: none"> - I welcome the proposals with regard to the Candidate Special Landscape Areas, particularly the...Tweed, Etrick and Yarrow Confluences. Specifically, the existing AGLV designation of the area around the Three Brethren summit has always been vulnerable without protection of the ridge running westwards from it. It is very much the "gateway" to the high ground between the Yarrow and Tweed valleys, and then on to the Tweedsmuir hills themselves, and cannot be taken in isolation. 	Support noted.	Support noted.
	Clovenfords and District Community Council	<ul style="list-style-type: none"> - We welcome the consultation as it has become clear from recent planning applications, including some affecting our community, that the previous designations had become 	Support noted.	Support noted.

	Keith James	<p>outdated and inappropriate</p> <ul style="list-style-type: none"> - We commend the thorough approach by SBC and your planning consultants as reflected in the detailed and multi-faceted evaluation of the significance of the components of our landscape. We think this is an appropriate methodology. - We note the high scores/ranking of a number of component parts of this area and agree with the assessment that the sections of the Tweed leading down to its confluence with the Etrick have a peculiar and varied aspect to their landscape and to the use of the land - we agree with the slight extension northwards of the current AGLV above Caddonfoot so that the new boundary of special designation comes up to the southern and eastern settlement boundary of Clovenfords - ...I would like to urge SBC to proceed with the proposal to create a SLA – The Tweed, Etrick and Yarrow Confluences – which includes not only the Three Brethren area but spreads westward along the ridge to Minchmoor 	Support Noted	Support Noted
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<p>18.) Minchmoor Summit and land to the south</p>	<p>Broadmeadows Action Group; John Muir Trust; Brian McCrow</p>	<ul style="list-style-type: none"> - The one concern we have relates to the Minchmoor. The boundaries for the proposed Tweed Valley SLA & Tweed, Ettrick and Yarrow Confluences SLA appear not to take in the Minchmoor summit itself. However, this now features in the SBC inventory of key viewpoints along the Southern Upland Way by virtue of the 360 degree view it commands. We would urge the Council to consider the importance of providing protection for this site. 	<p>There is significant additional information within the representations regarding the Minchmoor summit and flanks to justify amendment of the boundary. It is agreed a logical boundary choice for the additional area would be the A708 road.</p>	<p>Accept addition of the Minchmoor Summit and land to south to A708, to the proposed Tweedsmuir Upland SLA.</p>
	<p>Walkerburn and District Community Council</p>	<ul style="list-style-type: none"> - Boundary could be moved southward to A708 (Selkirk to Moffat Road) - We note that the area UP10 scored highly in the Consultant's report and believe that there would be merit in looking again at the southern boundary of the Tweed Valley SLA. Local opinion settled on the 30 northing on the 1:50,000 OS map as a suitable boundary since it cuts across the ridges to the south of the Minch Moor summit...Should it be felt that this extends the Tweed Valley SLA too far to the south then we propose that at the very least the boundary encompasses the Minch Moor summit and the tracks 	<p>Please see the response to Issue 18.)</p>	<p>Accept addition of the Minchmoor Summit and land to south to A708, to the proposed Tweedsmuir Upland SLA.</p>

	<p>Walking Support; Clovenfords and District Community Council</p>	<p>immediately to the south.</p> <ul style="list-style-type: none"> - ...we feel that there is justification for extending the area of the Tweed Valley section to the south thereby giving protection to all land on the south side of the Southern Upland Way. Indeed by so extending this area it would appear to be only doing what the Council itself has suggested when it said there is “no clear rationale” for keeping the southwest flank of the Minchmoor flank outside “SLA” status. This would also help to protect the views that walkers have on the section of the Southern Upland Way as it descends SE towards Traquair 	<p>Please see the response to Issue 18.)</p>	<p>Accept addition of the Minchmoor Summit and land to south to A708, to the proposed Tweedsmuir Upland SLA.</p>
	<p>Jeremy Snodgrass</p>	<ul style="list-style-type: none"> - ...less convinced at the exclusion of the land to the south of the Minchmoor Hill summit. This area of land, when viewed from the ridge between the Three Brethren and Minchmoor, or from the Southern Upland Way between Traquair and Dryhope, is integral to the landscape qualities of the area. The central part of this area, around Hannel Bog, is a pocket of true wilderness and merits a degree of protection for this quality alone 	<p>Please see the response to Issue 18.)</p>	<p>Accept addition of the Minchmoor Summit and land to south to A708, to the proposed Tweedsmuir Upland SLA.</p>

<p>19.) Objection to the designation of the SLA</p>	<p>Greenpower</p>	<ul style="list-style-type: none"> - Firstly we are perplexed as to how the Council has gone from a position of identifying the area around Broadmeadows Wind Farm as being in a preferred area of search for wind farm development, as shown in Diagram 18 of the 2001-2018 Structure Plan, to the position now where this area is now being proposed as part of a Special Landscape Area. We consider that this previous guidance and how it relates to the current Local Landscape Designations has not been dealt with in the draft SPG. - Secondly, whilst we understand that the landscape around Broadmeadows is an attractive landscape (in no small part to the good land management carried out by the landowner), we do not consider it to be particularly unique or of extra special quality in a Borders landscape context. It is essentially an open moorland site which is a common feature in the Borders. - If there is a justification by the Council that the proposed boundaries of Tweed, Ettrick and Yarrow Confluences SLA has been defined to prevent Broadmeadows Wind Farm (or any other wind farm 	<p>The independent findings of the LLDR disagree with this assertion both LCUs (UP10 and RV60) scored highly enough to be included in the area of search and the proposed Tweed, Ettrick and Yarrow Confluences SLA.</p> <p>The Consultants have completed an independent review of local landscape designations, including proposing SLAs. In doing this it has been important they use a robust methodology; the Council and SNH are satisfied that this has been done without prejudice. All of the findings can be found in the LLDR and the updated report.</p> <p>In addition the Wind Energy SPG updates the Council position, from that in the Structure Plan, regarding wind energy developments</p>	<p>No further action</p>
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		proposal in this area) being visible from Scott's View, we consider that the potential impact of a wind farm from this distance has been overestimated by the Council and its advisors.		
20.) Assessment and implications for Bowhill Estate	Mark Steele (for Graham & Sibbald for Buccleuch and Northumberland Estates) Mark Steele (for Graham & Sibbald for Buccleuch and Northumberland Estates)	<ul style="list-style-type: none"> - 'Rarity' where (given the particular contribution of the Bowhill estate) a rank of 'high' may be more appropriate than medium - The LLDR is not explicit as to the nature of changes to forestry and estate management practices so the implications for the management of the Bowhill estate are not clear. Greater clarity is required. - ...it would be prudent to include windfarm development...the final reference to windfarms should be more explicit and expanded to include all wind energy developments including single turbines 	<p>The Bowhill estate is an attractive designed landscape. However, the Borders contains a number of such designed landscapes, and the LCU RV60 (containing Bowhill) is not considered to include a <i>"large number of landscape features which are rare or unique within the Scottish Borders"</i> (Table 3.2, LLDR)</p> <p>The addition of examples will help make the Forces for Change clearer</p> <p>The Management recommendations could be reworded to make explicit reference to differing forms of wind energy developments</p>	<p>No further action.</p> <p>Accept insertion of examples to improve the clarity of the Forces for Change and accept change in wording to incorporate differing forms of wind energy development.</p>

21.) Tweed Valley cSLA	Innerleithen and District Community Council	<ul style="list-style-type: none"> - The boundaries of the SLA for the Tweed Valley be revisited to include...all of the biking areas at Innerleithen and Glentress. We believe that this is important in terms of the plans of the AimUp biking development project and future Innerleithen 	It would be inappropriate to change the boundaries for non-landscape reasons.	No further action.
22.) Comments on RV 60 Lower Ettrick/Yarrow, LCU RV48 Upper Ettrick and UP11 Black Knowe	Ettrick and Yarrow Community Council	<ul style="list-style-type: none"> - Upper Ettrick should have scored within the top third, a number of omissions are discussed: 	<p>The two relevant LCUs (UP11 Black Knowe and RV48 Upper Ettrick) originally scored below the threshold to be considered as a part of the area of search However the scoring has been re-examined and as a result for Black Knowe the score was raised to 45 (with an increased ranking score for 'Views' and 'Tourist Economy') and for the Upper Ettrick the score was raised to 45 (with an increase for 'Representativeness'). However the increase in the ranking score for the LCUs was not sufficient to be included in the area of search for SLA designation.</p> <p>It is considered that the scoring of the relevant LCUs is robust, in response to the additional points</p>	Accept positive scoring changes for 'Views', 'Tourist Economy' and 'Representativeness'

	<p>Etrick and Yarrow Community Council</p>	<ul style="list-style-type: none"> - Rarity: The Etrick Marshes; The River's sand cliffs, gravelly bed and the gorges: Kirkhope Linns, Prison Linns and the dramatic Gait Crook above Kirkhope Linns; Peel towers etc 	<p>raised:</p> <p>It should be noted that the LLDR did recognise rarity as stated: "contains some unique features which do not occur elsewhere, including exposed rock strata around Etrick, Etrick Marshes, and the sandy cliffs at river bends. Peel Towers are not considered unique to this LCU (RV58)</p>	<p>No further action.</p>
	<p>Etrick and Yarrow Community Council</p>	<ul style="list-style-type: none"> - Settlement Setting: Etrick Kirk, Kirkyard and Manse and steading lie in the spectacular setting of the hills and the river, a little way up from Etrick Hall 	<p>The LLDR identifies that for LCU RV48 there is a "close relationship between the topographic pattern and the settlements of Etrick and Etrickbridge"</p>	<p>No further action.</p>
	<p>Etrick and Yarrow Community Council</p>	<ul style="list-style-type: none"> - Condition: central part of Upper Etrick is only rated medium and criticised for its eroded nature. 'Eroded' should not be used as a term of disparagement, because erosion is the cause of most landforms of interest of which there are many in the 'eroded' parts of the Etrick valley- due to both glacial and fluvial erosion 	<p>In this case "erosion" refers to human-led changes to landscape structure (i.e. land-use pattern) rather than to natural erosion affecting underlying landforms (for LCU RV48)</p>	<p>No further action.</p>
	<p>Etrick and</p>	<ul style="list-style-type: none"> - Enjoyment: Footpaths, trackways 	<p>The LLDR recognised</p>	<p>No further action.</p>

	Yarrow Community Council	and roads between Ettrick water and Yarrow water and a range of activities. People come for the peace and beauty of this remote place	enjoyment of the landscape through the high ranking (for LCU RV48)	
	Ettrick and Yarrow Community Council	- Cultural Qualities: well known historical figures are associated with the landscape (James Hogg, Sir Walter Scott and Rev. Thomas Boston). Archaeological sites are barely given a place in the cultural qualities (Roman Fort near Aikwood, Bronze and Iron Age settlements)	This LLDR recognised the important cultural qualities through the high ranking (for LCU RV48)	No further action
	Ettrick and Yarrow Community Council	- Settings & Views: Views of Bowhill, important bridges over the river, Upper and Lower Swyre and other paths and roads. Connections between the twin Valleys are part of the 'Settings and Views' and also important is the contrast between low river views and the broad and great views over hill and valley to the Eildon Hills and beyond.	The visual relationships with enclosing high ground are noted in the LLDR. The historic bridges are not mentioned, but contribute to the 'high' ranking for cultural qualities. The views ranking for UP11 Black Knowe was increased in the re-examination of the scoring.	Accept positive scoring changes for 'Views' criteria.
	Ettrick and Yarrow Community Council	- The Upper Ettrick Water and the Upper Yarrow Water and their surrounding hills, form part of a topographical, cultural and historical whole. We request that together they should be designated as a SLA.	LCU RV49 Upper Yarrow originally scored 54 and was included in the area of search for a SLA. After re-examination of the scoring RV49 increased to 57 (due to an increased score for Views). It was felt that some	Accept addition of RV49, to boundary at A708, to the Tweedsmuir Uplands SLA.

	<p>Robert Maguire OBE FRSA</p>	<ul style="list-style-type: none"> - Place-names, inscribed stones and ruins relate back to very early Christian missionaries and later pilgrims moving over high north-south routes – still traceable as tracks – across the grain of the east-west valleys and uplands. Constant battling through centuries between peoples to the north and others to the south bred a hardy, canny Borders people – farming warriors, reivers and poets, for whom this landscape was one land. - In the early nineteenth century this landscape was a home of the Scottish Enlightenment. The Borders circle of Sir Walter Scott and James Hogg reached out across Britain to encompass such figures as Wordsworth, Coleridge, Southey and the scientist Humphrey Davey. 	<p>of the RV49 area warranted inclusion in the Tweedsmuir Uplands proposed SLA this was due to delineation of an appropriate boundary of the proposed SLA, the setting of the river valley in relation to the surrounding uplands and the views of the landscape from the A708 tourist route.</p> <p>The LLDR does recognise the cultural importance of the landscape in the relevant LCUs. This is reflected in the very high or high rankings for Cultural Qualities for LCUs RV60 and RV48; however UP11 does not score well in this category. After a re-examination of the scoring it was considered that the scoring, for this category, was robust and no further changes were made.</p>	<p>No further action.</p>
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		Scott's writings reveal the extent to which the valleys were linked in a common culture. Hogg would ride from the Ettrick Water 'over the top' to the Gordon Arms in the Yarrow Water to spend an evening of philosophical discussion with Scott and their associates.		
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Lammermuir Hills cSLA</p> <p>23.) General opinion on SLA status</p>	<p>Ian Kelly, Graham and Sibbald on behalf of Buccleuch Estates, Northumberland Estates and Hermitage Action Group</p>	<p>- Overall the assessment methodology for the draft SPG – Local Landscape Designations is rigorous (although requires some clarification of terminology...the assessment of the Lammermuir Plateau LCU (and the consequential Lammermuir Hills cSLA) is flawed as it lacks clarity and consistency and betrays a lack of understanding of the LCU landscape. Therefore, the Lammermuir Hills cSLA is not representative of the true extent of landscape worthy of designation. The LLDR assessment should be the subject of peer review prior to a comprehensive reassessment of the boundary of the LCU, the attributes of the landscape and the extent of the cSLA</p>	<p>Note that the respondent states the assessment methodology was rigorous. The concerns regarding the extent of the Lammermuirs are dealt with in more detail under Issues 24, 25 and 26 below.</p> <p>In summary the LLDR considered that the wider Lammermuir Hills were not a homogenous area, and the variation in character is recognised in the Borders LCA. The area typically seen as the Lammermuir Hills includes all or part of 5 LCUs (UP2, UP4, UF24, UF31 and UF37). It would be inappropriate to merge these diverse areas into a single LCU for evaluation purposes. However it is the case that amendments to the proposed Lammermuir Hills SLA have been made due to additional information contained in the rest of this representation as well as</p>	<p>Accept revision of scoring and the alterations to the boundaries of the proposed Lammermuir Hills cSLA, namely:</p> <ul style="list-style-type: none"> - along the south eastern boundary to include Dirrington Laws - to the eastern boundary to the path running past Little Dod to near Abbey St Bathans - to the north eastern boundary to the authority boundary with East Lothian, stretching west to Little Dod and including the land in between - on the western boundary to the A68, continuing south along the A697 - to the south and south west, to run along the Southern Upland Way, incorporating Edgarhope Wood in the south western corner.

	Dr D Long; Gordon & Westruther Community Council	- In the Lammermuir Hills the AGLV has been severely pruned, to my mind too drastically. I would wish to see reinstated the area of Dirrington Hills, Greenlaw Moor, Dogden Moss and the Bedshiel Kaimes, all of these reflecting the well-preserved post-glacial landscape of the southern Lammermuir fringe.	others. Please see the response to Issue 23.)	Please see recommendation for Issue 23.)
24.) Land to south west of Lammermuir Hills cSLA	Greenlaw and Hume Community Council	- ...express our deep concern about the proposal to drop... Greenlaw Common... We believe strongly that what amounts to the downgrading of their status in the overall landscape of the Scottish Borders is unjustified and most inadvisable - ...Greenlaw Common, (which) has high biodiversity, and very specific historical remains: Roman traces as well as Heriot's Dyke, which still survives on the moor and is a boundary marker which is recognised as a unique early form of political boundary and may date from anywhere between the late prehistoric to the medieval period. Like other walkers, we truly appreciate the isolation and sense of wildness on Greenlaw Common, which is	As a result of additional information contained in representations, the rankings for LCU UF37 Greenlaw Common were re-examined and increased by 5 to 51. The increase meant that the LCU became part of the area of search. It was decided that there was therefore justification for the Lammermuir Hills proposed SLA to be extended to cover Dirrington Laws as well views of Greenlaw Common. This change better reflects the rarity of Dirrington Laws and their impact on nearby settlements.	Accept south eastern boundary revision to include Dirrington Laws.

	Mark Steele (Appendix to Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)	<p>unavailable anywhere else in the vicinity. On these grounds alone, we believe that Greenlaw Common should also retain its former landscape status.</p> <ul style="list-style-type: none"> - The Greenlaw Common LCU quantitative landscape evaluation acknowledges the prominence and importance of the Darrington Hills. However as the wider LCU 'scored' below the threshold there is no qualitative analysis of the Lauder Common LCU. A re-evaluation of the Darrington Hills area (rather than the whole LCU) would produce a 'score' justifying its inclusion within the Lammermuir Hills cSLA 	Please see the response to Issue 24.)	Accept south eastern boundary revision to include Darrington Laws.
25.) Land to the east, north-east and south-east of Lammermuir Hills cSLA	Gordon & Westruther Community Council	<ul style="list-style-type: none"> - GWCC have grave concerns with the removal of the eastern Lammermuirs from special designation. We would ask that consideration be given to moving the boundary further east than the B6355 	Additional information from consultation representations relating to iconic views from the southern upland way, cross-boundary issues (particularly settlement settings in East Lothian) and scenic qualities meant that it was felt extension of the proposed SLA eastward was justified (i.e. beyond the B6355). To achieve a coherent SLA it was necessary to include the majority of RV57 which did	Accept the revision to the boundary on the eastern edge of the proposed Lammermuir Hills SLA to the path running past Little Dod to near Abbey St Bathans

	<p>Mark Steele (Appendix to Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)</p> <p>Mark Steele (Appendix to Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)</p>	<ul style="list-style-type: none"> - Furthermore, the eastern edge of the Lammermuir Hills is equally important in views from the A1 'gateway' corridor - Typicality/Rarity- Whilst the evaluation acknowledges the scale and extent of the moorland there is no mention of the unique topography of the Morynut Edge and the associated cleughs (deeply incised side valleys) in the eastern Lammermuir Hills - ...<i>'The moorland blends gently into the neighbouring river valleys without strong physical relationships between the two'</i>. This is not representative of the whole plateau, as the cleughs associated with the Morynut Edge create a strong physical relationship between the moorland and Morynut Water valley. - There is also an issue raised by Part 2 of the qualitative landscape analysis. This conclusion is misguided as the moorland and 	<p>It is considered that the Lammermuir Plateau was less important to the A1. However as the boundary has been extended eastward so the importance in views from the A1 'gateway' corridor increases</p> <p>Re-examination of the scoring has resulted in extension of the cSLA in the north east to better reflect the cross-boundary relationship with East Lothian. As a result the Morynut Edge and cleughs are included where they are found in the Borders.</p> <p>It is agreed that the moorland at the 'Lothian Edge' is contiguous when viewed from the north. The north eastern Lammermuirs are now included in the proposed Lammermuir Hills SLA as described in the response on p46/47 above.. It is not considered that the LLDR is contradictory towards the presence of wind farms, this is because different wind farms</p>	<p>Accept the revision to the boundary on the eastern edge of the proposed Lammermuir Hills SLA</p> <p>Accept the revision to the boundary on the north-eastern edge of the proposed Lammermuir Hills SLA to the authority boundary with East Lothian, stretching west to Little Dod and including the land in between.</p>
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	<p>Gordon and Westruther Community Council</p>	<p>associated 'Lothian Edge' are contiguous when viewed from the north and is not 'isolated' as suggested. The LLDR is also contradictory with respect to the presence of wind farms as it argues that their presence does affect landscape character yet does not impinge upon the integrity of the LCU. Therefore the statement that <i>'There is therefore some rationale for detaching the portion of the LCU which lies north-east of the Whiteadder'</i> is neither substantiated nor sufficiently categorical to warrant the exclusion of the eastern Lammermuir Hills</p> <ul style="list-style-type: none"> - Add to the end of the Designation Statement "Visually the edges of the plateau are also important to the Berwickshire Merse" - 5.1 (of the LLDR) States that <i>Upland SLAs, where the emphasis of policy should be on retaining their 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.</i> GWCC would therefore request that 	<p>have different affects on their surroundings.</p> <p>While the wider Lammermuirs are considered a key part of the setting of the Merse, the central plateau as currently defined by the cSLA is of less importance in this regard.</p> <p>It is considered that fence lines are not the best boundaries for designation. A more appropriate boundary has been proposed along the Southern Upland Way.</p>	<p>Accept revision of the south-eastern boundary of the proposed Lammermuir Hills cSLA.</p>
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		the southern boundary be moved further south to the fenceline at 608518, to enable the southern skyline to gain the highest protection		
26.) Land to the west and south west of Lammermuirs cSLA	Mark Steele (Appendix to Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)	<ul style="list-style-type: none"> - The description fails to mention the importance of the western edge of the Lammermuir Hills (which lies outwith the Lammermuir Plateau LCU)... - It is claimed that <i>'The area forms a limited part of the settlement setting for Lauder, but generally the area is uninhabited and the majority has no role in the setting of Borders settlements'</i>. Clearly this statement is incorrect. The Lammermuir Hills form a prominent and key part of the visual setting of Lauder, Duns and an number of other settlements in the Scottish Borders - Views- It is stated that <i>'The western edge is important in views from the A68 gateway corridor'</i>. This is correct and contradicts the omission of the western extent of the existing AGLV from the LCU and cSLA. - The western edge of the Lammermuir Hills lies within the Lauder Common LCU (reference UP04). Whilst there is reference to the Dun Law Windfarm in the 'Intactness' section of the quantitative landscape 	The proposed cSLA was designed to protect the Lammermuir Plateau and not the surrounding areas. In light of consultation representations a re-examination of the western boundary of the cSLA took place and it was considered that the additional value of the wider setting of the Lammermuirs and the 'gateway' into the Borders from the A68 justified an extension of the Boundary to the A68, then running south east along the A697	Accept the proposal to extend the cSLA Lammermuir Hills westward to the A68, then running south east along the A697

	Gordon & Westruther Community Council	<p>evaluation there is no acknowledgement in the 'Key Landscape Relationships' of the direct relationship between the hills to the east of the A68 and the Lammermuir Plateau LCU. Indeed these hills are an integral part of the Lammermuir Hills topography and should have been included in that LCU as well as the consequential cSLA.</p> <ul style="list-style-type: none"> - GWCC would welcome the addition of Edgarhope Wood 	Edgarhope Wood was not included in the draft proposed Lammermuir Hills SLA. However after the re-examination of the scoring and update following consultation representations, the wood has been included in the proposed SLA, in the south western corner	Accept revision of the SLA boundary to the south and south west, to run along the Southern Upland Way, incorporating Edgarhope Wood in the south western corner
27.) Wind energy development & Lammermuir Hills cSLA	EDF ER	<ul style="list-style-type: none"> - On a detailed point, EDF ER notes the designation statement in relation to Special Landscape Area 6 - Lammermuir Hills will include the consented Fallago Rig wind farm...in the light of this it would be worthwhile the designation statement acknowledging this significant scale of development, as an indication that such development can be 	Fallago Rig is mentioned in the assessment sheet for LCU UP2, Lammermuir Plateau.	No further action

	<p>Ian Kelly, Graham and Sibbald on behalf of Buccleuch Estates, Northumberland Estates and Hermitage Action Group</p>	<p>accommodated without harm to the intrinsic landscape character of the upland plateau</p> <ul style="list-style-type: none"> - It is questionable whether it is a valid policy response to give up on the wider Lammermuirs because of adverse decisions such as the consenting of the Fallago wind farm. Without an up to date landscape protection policy in this area there is a danger that existing consents will simply become the main justification for additional consents for wind farms. 	<p>It is agreed that an up to date landscape protection policy is necessary and this forms the main reason for undertaking the independent Local Landscape Designations Review. The methodology employed led to the conclusion that a coherent SLA would cover the Lammermuir Plateau but not the surrounding areas. However in light of additional information in representations extensions to the cSLA are put forward. SLAs are not intended to be wind farm free, although they do form a material consideration in the determination of planning applications.</p>	<p>Accept revision of scoring and the alterations to the boundaries of the proposed Lammermuir Hills cSLA, namely:</p> <ul style="list-style-type: none"> - along the south eastern boundary to include Dirrington Laws - to the eastern boundary to the path running past Little Dod to near Abbey St Bathans - to the north eastern boundary to the authority boundary with East Lothian, stretching west to Little Dod and including the land in between - on the western boundary to the A68, continuing south along the A697 - to the south and south west, to run along the Southern Upland Way, incorporating Edgarpope Wood in the south western corner.
	<p>Mark Steele (Appendix to Graham and</p>	<ul style="list-style-type: none"> - Wildness - It is claimed that <i>'development is limited to coniferous forest, access tracks and pylon lines'</i>. 	<p>It is likely that further wind farm development will impact upon relative wildness of the plateau.</p>	<p>No further action.</p>

	<p>Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)</p> <p>Mark Steele (Appendix to Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)</p>	<p>However there is no mention of the effect of existing and proposed wind farms on wildness or wildness characteristics</p> <ul style="list-style-type: none"> - Scenic Qualities – Again, there is no mention of the effect of existing and proposed wind farms on scenic qualities - Whilst the LLDR is not explicit it is nevertheless implicit (given the exclusion of the eastern Lammermuir Hills from the cSLA due to the Crystal Rig windfarm) that windfarm development is the main force for change. However the LLDR assessment is contradictory, as the integrity of the cSLA designation is challenged by the approval of the Fallago Windfarm (within the northern part of the cSLA); the current Brunta Hill Windfarm application (on the south-eastern boundary of the cSLA) and the scoping opinions sought for proposed windfarms at Ditchers Law, Hillhouse and Windy Law. The latter three windfarms are all located on the western edge of the Lammermuir Hills and two are within an area that is currently part of the AGLV but has been excluded from the Lammermuir Hills cSLA apparently without any 	<p>Future landscape change is subject to uncertainty.</p> <p>It is not considered the LLDR is contradictory towards the presence of wind farms because different wind farms affect their settings in different ways. SLAs are not intended to be wind farm free and as such there is no challenge from consented or proposed wind farms. These cannot be fully taken into account due to the uncertainty surrounding their development. It is the case that the Brunta Hill application remains outwith the revised proposed Lammermuir Hills SLA but the scoping opinions are within the revised eastern boundary</p>	<p>No further action.</p>
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	Mark Steele (Appendix to Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)	<p>justification.</p> <ul style="list-style-type: none"> - The 'Statement of Importance' makes the following 'Management Recommendations' – <i>Seek to maintain the wild land character of the plateau</i> - The last recommendation is of particular relevance, as it is widely acknowledged (in particular by SNH) that windfarm development is the main threat to wild land and its characteristics. Therefore the most effective means of maintaining <i>'the wild land character of the plateau'</i> is to resist further wind farm development 	<p>The reference to wild land has been revised to relative wildness, as this is more accurate a description of planning policy and work by SNH. It is therefore the case that the statement in the submission may no longer be representative of the objective of the criteria.</p> <p>Nonetheless it is considered that wind energy development would be an appropriate force for change for the revised Statement of Importance for the proposed Lammermuir Hills SLA.</p>	Accept revision to 'Wildness' to better reflect planning policy and SNH work. Include wind energy development as an appropriate force for change.
28.) Hume Crag and Castle	Mr Martin Pearson & Sir John McEwen	<ul style="list-style-type: none"> - Non-inclusion of Hume Crag is of concern as they adjoin Hume Castle and together form one of the most visible landmarks on the northern edge of the Tweed Valley - the crags and castle group are visible both from the south (as far as the Border at Carter Bar) as well as from the Lammermuirs to the north. The flora and fauna on the crags form an important natural "island reserve" in the middle of farmland. 	<p>Hume Castle and Crag are considered to be important landscapes in their own right. The castle is a Scheduled Monument and Local Plan Policy BE2, Archaeological Sites and Ancient Monuments, provides protection to the castle and its setting from inappropriate development.</p> <p>The LCU LO43 Black Hills/Hume</p>	No further action.

	<p>Mrs Helen Pearson;</p> <p>John and Elizabeth Nicholls for Greenlaw and Hume Community Council</p>	<ul style="list-style-type: none"> - The castle and crags are a landmark for miles around and need protection, especially from encroachment by wind turbines, industrial turbines have already been approved within the Council's own recommended exclusion zone proving that more protection and not less is required. - the Local Landscape Designation Review... gave Hume Crags a high ranking in uniqueness as volcanic crag outcrops in the Borders landscape and a good medium score for wildness. I would add to this that Hume Castle, a Grade One building of historic importance and rated as an iconic viewpoint by the SBC Planning Department, sits on a volcanic crag that is geologically part of the Hume Crags complex and cannot be separated from it visually or geographically - The Crags are very apparent in the agricultural landscape around them because of their unusual shape and lead the eye to further outcrops on the western horizon beyond their immediate vicinity - ...Hume Castle is visited by many tourists during the year, who come to it for its views outwards over the whole area, for its history and for its 	<p>Crags scored highly before and after the re-examination of the scoring. However, in designating SLAs the SNH/HS guidance suggests practical considerations should be considered i.e. need, to what extent will designation provide for more effective safeguard, management or promotion of the special attributes of the area being considered for designation; and integrity, is the area to be designated both coherent enough and of sufficient size to make it practical to develop policies for its protection, management and promotion? It was considered that Hume Castle and crags, given its small area and existing policy protection did not require to be designated a SLA.</p>	
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		<p>setting, which is visible for miles around. Any future development proposal on the rest of the Craggs opposite it would affect the Castle site's integrity and severely damage a visitor's sense of historic place. Whilst we are aware that SLA status does not preclude development in an area, it 'provides a strong framework for identifying an area's sensitivities and the nature of the development that could be allowed within it'. In view of the recent rush of applications for wind turbine developments in the Borders, including Berwickshire, we think it is not the right time to lessen the protection that SLA status would give to Hume Craggs.</p> <ul style="list-style-type: none"> - ...we cannot accept lack of a 'landscape bridge' between other parts of the Borders and a reduction in size of an area should count for so much. Surely the dicta that 'small is beautiful' and 'size does not matter' should still apply to Hume Craggs - 		
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	SNH	<p>Upper Tweeddale NSA. This forms a coherent designation that incorporates trans-boundary features, and links the, Tweedsmuir area to hill ranges to the west.</p> <ul style="list-style-type: none"> - 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. 	Please see the response for Issue 29.)	Accept revision of the western boundary of the proposed Tweedsmuir Uplands SLA.
	Manor, Lyne & Stobo & Upper Tweed CCs	<ul style="list-style-type: none"> - ...concerned about the residual impact on the Borders economy, in particular tourism, by the proposal to downgrade a) all of the uplands to the West of the Tweed from Broughton to Tweedmuir 	Please see the response for Issue 29.)	Accept revision of the western boundary of the proposed Tweedsmuir Uplands SLA.
	Manor, Lyne & Stobo & Upper Tweed CCs	<ul style="list-style-type: none"> - To rid this area of its protection would leave it open to future developments such as windfarms. Rural populations are very reliant on the tourist industry and everything must be done to protect this. 	Designation as a SLA will not preclude wind farm development but will be a material consideration in the determination of planning applications. The western extent of the Tweedsmuir Uplands to the authority boundary is now proposed as a SLA	Accept revision of the western boundary of the proposed Tweedsmuir Uplands SLA.
	Polly Lambert; Liz Pascaud	<ul style="list-style-type: none"> - Broughton Heights (UP05), Tweedsmuir (UP09) and the River 	A re-examination of the area north of the NSA (Broughton	Accept revision of the northern boundary of the proposed

	<p>Manor, Lyne & Stobo & Upper Tweed Community Councils</p>	<p>Tweed (RV50) score highly in so far as they should remain protected, however, once the weighting has been applied their risk of losing the AGLV status increases significantly- mainly as a result of being sparsely populated areas. Disagree completely with this notion</p> <ul style="list-style-type: none"> - also question the reasons for removing a part of the area around the Source of the Tweed, which has SSSI status, from the protection of AGLV - A number of examples of the cultural and archaeological history of the Upper Tweed are provided in an addendum to the joint community council representation 	<p>Heights) was also undertaken due to additional value from consultation representations. The scoring for LCU UP05 Broughton Heights was revised upwards to 52, a change that meant inclusion in the area of search. The change was the Views ranking increasing to very high (weighted). Additional value was also given due to views from the A701. As a result it was considered appropriate to revise the north western boundary of the proposed SLA.</p> <p>SLA designation is not intended to protect sites designated for non-landscape reasons (i.e. SSSI). These designations have their own protection under Local Plan policy NE2 National Nature Conservation Sites.</p> <p>The re-evaluation of the scoring was influenced by additional information contained in representations and therefore they played a role in extension of the boundaries of the Tweedsmuir Uplands proposed</p>	<p>Tweedsmuir Uplands SLA.</p> <p>No further action.</p> <p>Accept revision of the boundaries of the proposed Tweedsmuir Uplands SLA</p>
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			SLA	
30.) Cross-boundary issues	Jacobs for SSE Renewables	<ul style="list-style-type: none"> - The proposed new Tweedsmuir Uplands SLA occupies a smaller area than the existing AGLV, with its westerly boundary extending as far as the A701, where the previous AGLV extended to the regional boundary. It is notable that this new boundary does not define a distinct change in landscape character, quality or value. Although the road provides an easily defined boundary, there is a more gradual change in character and sensitivity of the landscape moving eastwards within the SLA to the more remote areas of hills, which should be recognised within the Statement of Importance for this SLA 	The Statement of Importance will be revised to reflect the changes to the extent of the proposed Tweedsmuir Uplands SLA, this information will be considered as a part of this.	Accept revised Statement of Importance for Tweedsmuir Uplands SLA.
	Community Council of the Royal Burgh of Peebles and District	<ul style="list-style-type: none"> - We appreciate the methodical and systematic way in which the landscape character of the SBC area has been reviewed and scored. We also take note that the basis of the exercise is to ascribe "local" landscape designation. Nonetheless, we are of the view that the analysis fails to give adequate consideration to the overall setting of the SBC area within the larger region of Southern and Central Scotland. A 	As a part of the re-examination of the Tweedsmuir Uplands proposed SLA (and other proposed SLAs) cross boundary issues were considered further. As a result the boundaries of some of the proposed SLAs, Tweedsmuir Uplands being one, are better contiguous with neighbouring Local Authorities. The Landscape Review was only concerned with designating	Accept relevant boundary changes of SLAs as detailed within this report.

	SNH	<p>consequence of this is that there is little recognition of significant features and designations in the adjacent regions outside the 5km buffer zone, and attenuation of significance along the landward borders of the area.</p> <p>- Matters of cross-boundary continuity are also raised in relation to proposals for this area...we would suggest that the opinions of South Lanarkshire Council and others are considered in detail</p>	<p>the “best” of the Borders landscapes, there would not be merit in trying to compare with other Authorities.</p> <p>Please see the response to Community Council for the Royal Burgh of Peebles and District (above)</p>	<p>Accept revision of the western boundary of the proposed Tweedsmuir Uplands SLA.</p>
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Miscellaneous</p> <p>31.) Moorfoot Uplands</p>	<p>Dr D Long</p>	<p>- Puzzled by the omission of the Moorfoot Uplands</p>	<p>The scoring for the relevant LCU UP3 Moorfoot Plateau was re-examined however no additional information was provided that changed the ranking. As a result the area did not score highly enough to be included as part of a SLA.</p>	<p>No further action.</p>
<p>32.) Hermitage and Liddesdale Area</p>	<p>Newcastleton & District Community Council;</p>	<ul style="list-style-type: none"> - ...hard to see how any rigorous scientific criteria can be bent to apply to what is, clearly, a few people's subjective opinions especially on issues such as 'Scenic Qualities', 'Enjoyment' and 'Views'. In fact, the difference between some of the 'Landscape Quality Criteria' is unclear in a study that purports to follow a scientific methodology. - As Liddesdale represents a significant section of the actual English-Scottish border as it was drawn after centuries of warfare... these omissions and the neglect of Liddesdale in general seem inexplicable - Typicality/Rarity- Liddesdale not typical of the Borders landscape, particularly the hilly and more remote parts of North Liddesdale; very different to neighbouring Northumberland and Cumbria - Condition- large parts of the 	<p>The LLDR was not intended to be a scientific study; instead it attempts to evaluate the landscape in an objective way as possible, following an approach based on established SNH & HS guidance. The Consultants employed are considered to bring expertise to landscape assessment and have completed a number of similar exercises in Scotland and England.</p> <p>The scoring has been re-evaluated following the consultation period by the Consultants and as a result changes to the scoring have been made that were influenced by additional value contained in representations. The result of the re-examination was that the scoring of the LCU RV51 Liddel Water increased from 41 to 49, which placed the LCU just outside of the area of search.</p>	<p>Accept the improved scoring for 'Tourist Economy', 'Views', 'Wildness', 'Condition' and 'Rarity'</p>

		<p>Liddesdale landscape have remained largely untouched for hundreds of years. Newcastleton is famous for being a planned village;</p> <ul style="list-style-type: none"> - Intactness-...large buildings such as Hermitage Castle continue to dominate the landscape in all directions... very little (if any) irrevocable industrial developments have damaged the Liddesdale landscape. - Wildness- Liddesdale is one of the wildest, most remote areas of the Scottish Borders and, as such, should have scored very highly against this aspect of the Landscape Character Criteria. The uphill terrain is extremely rugged... - <i>Scenic Qualities</i>- ...Hermitage Castle, Hermitage Water, Saughtree, Kershope Forest, Newcastleton, Steele Road and Whitrope... several other photographic collections of the Scottish Borders and Liddesdale - <i>Enjoyment</i>- Liddesdale is enjoyed by: walkers, cyclists, trail runners, car rally enthusiasts, UK and overseas motorcycle clubs, classic car enthusiasts, writers, photographers, geologists, bird watchers etc - <i>Cultural Qualities</i>- The immensely rich history of Liddesdale is the equal of anywhere in the Scottish Borders. One 		
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	<p>Neil Bryce</p> <p>Lynn Craig</p>	<p>example is the Reiver Trail</p> <ul style="list-style-type: none"> - <i>Habitat Value</i>- Liddesdale is home to many valued species...raptors and rare butterflies - <i>Settlement Setting/Views</i>- Liddesdale has some truly spectacular 'long views': The 600m summit of Tudhope Hill affords a 360° vista as far as... the English Lake District. The famous Hermitage Hills have splendid views - <i>Tourist Economy</i>- the tourist economy depends upon the positive aspects of Liddesdale being sustained and developed. It will be harmed if Liddesdale is downgraded by a local authority decision to wrongfully exclude it from the protection of a SLA category... <ul style="list-style-type: none"> - The historic, wild and iconic lands of Liddesdale, which are the very embodiment of Borders history and heritage, tick every box on the criteria list. How can it possibly be excluded from SLA status. - ...anyone who can be bothered to leave the Hub and spend time here in Liddesdale would learn what we all know – how precious and timeless this landscape is; what wonderful stories of the Reivers we learn as we travel the 	<p>Please see the response to Issue 32.)</p> <p>Please see the response to Issue 32.)</p>	<p>Accept the improved scoring for 'Tourist Economy', 'Views', 'Wildness', 'Condition' and 'Rarity'</p> <p>Accept the improved scoring for 'Tourist Economy', 'Views', 'Wildness', 'Condition' and 'Rarity'</p>
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	<p>Malcolm and Sandra McGregor</p>	<p>Reiver Trail. Finally, the only really great medieval castle in Scotland standing in all its glory, Hermitage Castle within the setting of the Hermitage Hills.</p> <ul style="list-style-type: none"> - express our concern of the omission of the Hermitage Valley and surrounding landscape as an area designated as a special landscape. When one considers this scenic valley and its wild and rugged surrounding landscape, the Reivers' Way, the forbidding aspect of the hills of the Debateable Land, the incredible breath-taking views from Arnot Fell hill, Hermitage Hill, Twislehope, Greatmoor Hill (599m) and the Dinley, the backdrop of Hermitage Castle and the fact that the ridge which runs along Sundhope & Braidlie boundaries is the watershed for the North Sea and the Irish Sea, this is such a unique and special landscape combination. 	<p>Please see the response to Issue 32.)</p>	<p>Accept the improved scoring for 'Tourist Economy', 'Views', 'Wildness', 'Condition' and 'Rarity'</p>
	<p>Malcolm and Sandra McGregor</p>	<ul style="list-style-type: none"> - ...with respect to the Hermitage Valley your reference to UP15 and UP16 are incorrect. .. they do not include the Hermitage Valley and its immediate surrounding landscape. The nearest LCU applicable is RV51... you should note from the LCU name that the focus 	<p>All LCUs are to some extent aggregates of smaller areas. The evaluation has focussed on the highlights.</p>	<p>No further action.</p>

	<p>Malcolm and Sandra McGregor</p>	<p>is the 'Liddel Water' valley leading towards Newcastleton and not the Hermitage Valley. There is a comment...which would lead one to believe Hermitage valley was not entered; "Lacks the grand hills on each side which contribute to the scenery of central Borders valleys" We assure you that anyone who had actually set foot in the Hermitage Valley could not possibly write this.</p> <p>- You have confirmed to us by email on 18th August your belief that the Hermitage Valley was actually visited by a representative of LUC, However, we remain unconvinced as the evidence in Appendix 1 is unclear as to the extent and thoroughness of that visit/field survey of the valley itself and its immediate surrounding landscape referred to above. Indeed, it is our view there is no evidence in the documentation the valley was visited.</p>	<p>It has been confirmed by the Consultants that the area was visited. A stop was made at the castle and then on through the B road to the A7.</p>	<p>No further action</p>
	<p>Malcolm and Sandra McGregor</p>	<p>- It is gratifying there is recognition, (probably from the desk based activity of the LUC consultants), of Hermitage Castle – and the 'Landscape Quality' criterion 'Cultural qualities'. We do believe LUC has appreciated and understood this is one of the great</p>	<p>The 'Cultural Qualities' criteria scored 'very high' the best possible ranking. As a Grade A listed building Hermitage Castle and its setting are subject to stringent protection under Local Plan Policy BE1, Listed Buildings. It has been confirmed by</p>	<p>No further action</p>

	Malcolm and Sandra McGregor	<p>castles of the border as it has been ranked as 'very high'. However, we are unsure whether this was actually visited.</p> <ul style="list-style-type: none"> - However, also in connection with this criterion, we could mention the nearby pre-historic stone circle known as 'Nine-Stane Rigg', which is unfortunately completely ignored 	<p>the Consultants that the Castle was visited.</p> <p>It is considered that the Nine-stane Rigg is located outwith RV51, in UP15. For the evaluation sheet "small presence of archaeological remains" is mentioned and as a part of the re-examination of scoring the score for cultural qualities has been upgraded to medium and Nine-Stane Rigg referenced</p>	<p>Accept revised evaluation sheet for UP15 Wauchope Forest</p>
	Newcastleton Business Forum	<ul style="list-style-type: none"> - The village and community of Newcastleton and surrounds are located in an isolated and rural part of the Borders surrounded by scenic beauty... our economy is hugely dependent on tourism so any detraction from our natural scenic surroundings or tourism attractions will have an immediate and devastating impact on our local economy. 	<p>The Council will presume against development with an adverse effect on the landscape whether located in an SLA or not</p>	<p>No further action</p>
	Newcastleton Business Forum	<ul style="list-style-type: none"> - Scotland's greatest writer, Sir Walter Scott found Liddesdale to be an unparalleled source of Border Ballads. For seven years from 1792 onwards, he devoted substantial portions of his summer vacations to a series of what 	<p>The cultural qualities are recognised in the LLDR evaluation through the 'very high' ranking for 'Cultural Qualities' the best possible ranking.</p>	<p>No further action</p>

		he called 'border raids' in search of traditional ballad material and Liddesdale's remoteness drew him repeatedly back		
33.) The Merse	Hutton, Paxton & Fishwick Community Council & Foulden, Mordington & Lamberton Community Council	<ul style="list-style-type: none"> - The Merse area that includes the Lower Tweed, has its own unique character and though different to the landscapes farther to the west, it is nonetheless part of the special mix of landscape features that typify the Borders as a whole. We are therefore not entirely satisfied with the opinion and approach that this area is "not typical of the Borders" - Equally, we do not concur with the comment on p13 of the Draft document for the Lower Tweed Valley (LO39), that states, "Over the rest of the LCU, only the north bank of the Tweed is within the Borders, with the south bank in Northumberland, and any designation would lack coherence as a result". We would suggest that coherence in landscape in this instance, should not be measured alongside artificial boundaries. - Since coherence in approach is evident elsewhere in the report, we would suggest that the opposite north side of the Tweed, as shown in green as LO39 in the map (figure 8.1), be also 	<p>As a result of consultation representations The Merse area was re-examined. The scoring for the LCU LO38 North Merse did not change but for LO39 Lower Tweed Valley the score increased to 56; this was due to a change for the Representativeness score.</p> <p>The scoring of LO39 Lower Tweed Valley meant that it was included in the area of search for a SLA. However the area was not considered to present a coherent area for designation, as it consists of a number of small concentrations of high-quality landscape, spread out along the Tweed, while the wider landscape is not of such quality. The cross boundary issues were given greater consideration in the revised LLDR but the status of the Northumberland AHLV remains uncertain.</p>	Accept positive change for 'Representativeness' criteria

		<p>considered for a proposed SLA to allow consideration, at the very least, equal in status to the designation on the south side of the Tweed and of sufficient depth in distance from the river bank northwards, to take account of local increased visibility over distance in the low lying Merse</p>		
	<p>Hutton, Paxton & Fishwick Community Council & Foulden, Mordington & Lamberton Community Council</p>	<ul style="list-style-type: none"> - Existing Landscape Designations (Fig 6.1) show the south bank of the Tweed from the coast westwards as the Berwick Upon Tweed Area of High Landscape Value. On investigating this, it was established that this designation continues to exist and is currently in practice (despite a pending review) - It was also noticed that the accompanying text at 6.8 states that these neighbouring designations “have not been examined in detail” indicating that the opportunity to link to existing designations in other areas has not been taken. This is both regretted and questioned. 	<p>As a part of the re-examination of scoring cross-boundary issues, particularly contiguity with adjacent designations, were taken into account. In this case the issue was not sufficient to warrant creation of a Special Landscape Area.</p>	<p>Accept positive change for ‘Representativeness’ criteria</p>
	<p>Hutton, Paxton & Fishwick Community Council & Foulden,</p>	<ul style="list-style-type: none"> - Tourism plays a vital and increasing role in the economy of this area and to that end, we feel that the Tweed and its associated neighbouring landscape that visitors currently enjoy, be afforded protective status from isolated and 	<p>The role of tourism in LCU LO39, Lower Tweed Valley is recognised through the ‘high’ ranking for the ‘Tourist Economy’ criteria. The River Tweed is designated as a Special Area of Conservation, an international</p>	<p>No further action.</p>

	Mordington & Lamberton Community Council	“incongruous” developments. The River Tweed and its landscape setting throughout its length, is world-renowned.	conservation designation, as such it is protected by stringent Local Plan policy (NE1 International Nature Conservation Sites)	
34.) Lamberton Moor	Foulden, Mordington & Lamberton Community Council;	- You rightly mention the dramatic coastline from Cockburnspath to the Border and the A1/A1107 as being the western boundary. For the most part the road is some distance from the coast and is an appropriate edge: but from Burnmouth southward the A1 is very close to the sea and making this the boundary would be inappropriate since developments on the higher ground west of the A1 would detract from the views of the cliffs particularly as seen from the sea by tourists taking a coastal cruise from Eyemouth or Berwick. A more appropriate boundary would be the ridge (or better still some point west of the ridge) taking in part or all of Lamberton Moor	After the re-evaluation of scoring following the consultation period it was decided not to modify the Berwickshire Coast proposed SLA in this area. The landscape inland of the A1 is not of as high quality and though it does form part of the setting of the coast, unlike the Coldingham Moor area it is not a valuable coastal landscape in itself. As such the A1/East Coast Main Line has been retained as the proposed SLA boundary.	No further action.
35.) Berwickshire Coast cSLA	Ray Porter	- I welcome the Berwickshire Coast being included as a SLA, for it is one of the most stunning and important pieces of coastline in the UK. However, I am concerned about how thin the strip of coastline is – to afford this magnificent coastline the protection it requires and	As a result of the consultation representations the Consultants re-examined the extent of the proposed Berwickshire Coast SLA. The scoring for the relevant LCUs was re-examined and the only change made was for CO47 Coldingham Moor,	Accept the additional land proposed and boundary change for the proposed Berwickshire Coast SLA, as detailed in the response.

		<p>to ensure that the tourism industry is protected, I would recommend that a much greater inland area be included within the SLA. Tourists don't just come to the seaside, they visit the local area and expect all of it to be a special place to holiday. Indeed, one of the four practical criteria set out in the SNH/HS guidance which was used to identify candidate SLAs is "suitable size". I would contend that as drawn the Berwickshire Coastline SLA does not have suitable size/scale to be effective and as such the boundary should be redrawn to be the A1/east coast railway line.</p>	<p>which increased to 55 ('Views' increased to very high). It is felt there is justification for more of the coastal headlands and coastal moorland to be protected, particularly as this was an area that scored highly.</p> <p>The boundary chosen to represent the changes was the A1107 running south.</p>	
36.) Etrick Horsehoe to Loch of the Lowes	John Muir Trust; Donald Macleod	<ul style="list-style-type: none"> - The area scored 'high' on 6 criteria...and for those who have walked these hills they would add a 'high' for the 'Views' enjoyed from them. It is not clear why the evaluators only gave these hills 'Moderate' on this criteria. - The evaluators also described the value of this area to the 'Tourist Economy' as only 'Moderate'...the wildness of these hills, which should have been scored 'Very High' not just 'High', is an added attraction encouraging walkers and others to visit them. If they are not considered to be 	<p>As a result of the representations received the scoring was re-examined. For UP11 the scoring increased reflecting a change to 'High' for 'Views' and 'Tourist Economy'. It was considered that the relative wildness was very high at the southern end, however the northern end was less so, as such it was considered 'High' was appropriate.</p> <p>The change in the overall ranking score was not sufficient for the area to be included in the revised area of search.</p>	Accept the revised positive scoring changes for 'Views' and 'Tourist Economy'

		making much impact on tourism at present they are assets with substantial potential, deserving of protection		
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
Wind Energy 37.) Relationship to the Wind Energy SPG/Local Plan Policy D4	Philip & Finoula Kerr	- The landscape designation document has been preceded by that of the SPG on Wind Energy. The designation of the existing AGLVs as meriting protection as Areas of Moderate Constraint (Higher) are set to be transferred to the SLAs once confirmed and then this should be incorporated into the spatial guidance. Given the reference to Wind Farms as a potential force for change in several of the SLAs it should be stated in the finalised document that the Macauly GIS model has incorporated the new designations.	Once the Special Landscape Areas work is approved thought will be given to updating the Wind Energy SPG. Special Landscape Areas will continue to be “areas of significant protection” as AGLVs are currently	Accept proposal to update Wind Energy SPG to be updated following approval of SLAs
	Alan Bailey;	- The consultation document does not make clear how the protection to be given to SLAs interfaces with the	Once the Special Landscape Areas work is approved thought will be given to updating the	Accept proposal to update Wind Energy SPG to be updated following approval of SLAs

		<p>protection offered under the Spatial Strategy constraints set out in the SPG on Wind Energy...Full clarity must be provided in the final designation of SLAs to confirm that SLAs must be treated as being of equal merit to “Areas of significant protection” as provided for in the Wind Energy SPG</p> <ul style="list-style-type: none"> - For example a significant area centred roughly on the Swinnie Forestry Commission plantation, located equidistant between Jedburgh and Bonchester Bridge, is shown as being: <ul style="list-style-type: none"> o In an “Area of Search with Minor Constraints” under the Wind Energy SPG, and o Being in the Teviot Valleys SLA under the consultation document - One interpretation of this is that the protection from inappropriate development being offered by SLAs is only a “minor constraint” - However the consultation document describes the proposed SLAs as having “met a rigorous evaluation process which means they are truly special (Item 6.4). - Full clarity must be provided in the final designation of SLAs to confirm that SLAs must be treated as being 	<p>Wind Energy SPG. Special Landscape Areas will continue to be “areas of significant protection” as AGLVs are currently</p>	
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	<p>Lilliesleaf, Ashkirk & Midlem Community Council</p>	<p>of equal merit to “Areas of Significant Protection” as provided for in the SPG on Wind Energy. If this is not done, the contradictions between the two policy documents will create significant difficulties for the future protection of the SLAs</p> <ul style="list-style-type: none"> - It seems a contradiction that yellow areas (of minor constraint) are next to areas that are nominated as SLA. For example the large area to the south of Lilliesleaf. And the area near Whitmur Hall. 	<p>Please see the response for Issue 37.)</p>	<p>Accept proposal to update Wind Energy SPG to be updated following approval of SLAs</p>
	<p>Ian Kelly, Graham and Sibbald for Buccleuch Estates, Northumberland Estates and the Hermitage Action Group)</p>	<ul style="list-style-type: none"> - ...a need to integrate the SLA work with the SPG on wind energy and, although the SLA is a draft consultation it is considered that more could have been achieved in this regard at this stage. Without that level of integration the SLA document feels like a partial piece of work - ...(Policy D4) states “the results of that review (local landscape designations) will also be taken into account in assessing the suitability of locations for commercial windfarms”. Two problems arise. Firstly, the wind farm SPG has been completed and adopted in advance of the completion of the SLA work. That would tend to 	<p>Please see the response for Issue 37.)</p>	<p>Accept proposal to update Wind Energy SPG to be updated following approval of SLAs</p>

		<p>suggest that the wind farm SPG needs to be reviewed. Secondly, even with the current proposed SLAs, there is no associated policy statement that offers “significant protection” status to all designated SLAs (either as currently proposed or in final form). The wording “taken into account” might also be considered as rather vague.</p>		
38.) Impact of wind turbines on SLAs	Ray Porter and Dr Ian Woollen	<ul style="list-style-type: none"> - On the subject of windfarms, the document is largely silent on their impact and fails to take into account the impact that a windfarm can have on a neighbouring SLA even if it is just outside (or in some cases, some distance outside). The height of wind turbines should be considered in setting SLAs, but this does not appear to have been the case. There seems little point in having any designation, whether it be SLA or AGLV, if industrial wind developers are going to be allowed to ruin such areas with turbines. - Indeed, I think it is useful to note that the document acknowledges that wind farms are a serious blot on the landscape, as evidenced by most of the Lammermuirs now not making the cut as Special Landscape Areas 	<p>Wind farms are considered as a part of the scoring for the ‘Intactness’ criteria, for example the Evaluation Sheet for LCU UP4 Lauder Common references Dun Law and Toddleburn wind farms, in the ‘Intactness’ box. It is the case that different wind farms affect their settings in different ways and each LCU has been evaluated on the respective features contained within, therefore turbine height will have been an indirect consideration.</p> <p>In the case of impact on a neighbouring SLA the Local Plan policy, EP2 Areas of Great Landscape Value states “Where development proposals impact</p>	No further action.

	<p>Terence O'Rourke for Wind Energy</p>	<p>(despite being listed under the previous definition), as they are now blighted by wind turbines. Coldingham Moor is currently going the same way, probably shaping the ludicrous decision to draw the boundary of the coastal SLA around the other side of the windfarm.</p> <p>- Generally existing and under construction/consented wind farms do not appear to have been taken into account in the assessment. This is particularly the case for the rankings of wildness, scenic quality and views. Although they are sometimes mentioned in the intactness section of the landscape evaluation sheets they are then not taken account of elsewhere. There are many high peaks where, for example in the Tweedsmuir Uplands proposed SLA, Clyde, Glenkerie and other wind farms will now be visible and these do not appear to have been considered. In certain instances</p>	<p>on an Area of Great Landscape Value". In addition the Council will presume against development with an adverse impact on the landscape. These factors would protect against development outwith SLA boundaries.</p> <p>It should be noted that SLAs are not necessarily intended to be wind farm free, it is not considered that this is a practical position to take.</p> <p>It is considered that where wind farms, either planned or existing, exert a strong influence on character, this has been identified. It is acknowledged that new developments will be visible from summits, but there will be very many areas within the Tweedsmuir Uplands, for example, where no turbines will be seen. The 'Views' criteria is intended to be recognise "key views to and from important built and natural heritage assets or transport routes" (Table 3.2 LLDR p12)</p>	<p>No further action</p>
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	<p>Jacobs for SSE Renewables</p>	<p>the views appear to be scoring highly and do not take into account detracting manmade features such as wind farms, pylons and coniferous forest. Examples are UP8 and UP9 scoring high and UP7 very high but do not consider the landscape impact of views of Clyde and Glenkerie wind farms, which are now present. These wind farms introduce a man made influence and they must be acknowledged in the baseline assessments of landscape character and landscape quality and the associated scoring process. To omit reference to these new influences on the landscape discredits the methodology, the study findings and the draft SPG, which is based on these findings.</p> <p>- It is notable that none of the proposed SLA designations overlap with any existing wind farms within the region, though some coincide with proposed developments such as Earlshaugh. It is unclear whether this is deliberate or coincidental – either the wind farms have been developed in areas already of lower quality and value or their introduction is considered to have reduced/removed the</p>	<p>The proposed SLAs are not necessarily intended to be wind farm free, as this is not considered a practical approach to take. There are consented wind energy schemes within SLAs (for example Fallago Rig in the Lammermuir Hills proposed SLA)</p>	<p>No further action.</p>
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	EDF ER	<p>justification for designating areas as SLA. If the latter, this would infer that any wind farm would have an adverse effect on the quality and value of the landscape designation, which SSE Renewables does not consider to be accurate. It seems likely that the designation could in future be seen as a 'wind farm free zone' which could unduly prejudice future developments within SLAs, irrespective of whether they could be successfully accommodated without significant adverse effect and we would ask Scottish Borders Council to consider clarifying this prior to finalisation of the SPG.</p> <p>- EDF ER considers that the identification of such local areas should not generally be viewed as a policy consideration that weighs significantly against the development of further onshore wind turbines within those defined areas, subject to appropriate siting and design. The identification of areas of defined landscape quality can of course assist the objective assessment of proposals for all types of development. On a detailed point EDF ER notes the designation</p>	<p>Local Plan policy EP2 (which will be updated) which deals with local landscape designations is a material consideration in the determination of relevant planning applications (for wind energy or other development). The LLDR, as Supplementary Planning Guidance, provides additional information to help inform the decision taken by the Planning Officer.</p> <p>Fallago Rig is referenced in the</p>	No further action.
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	Dr Ian Woollen	<p>statement in relation to Special Landscape Area 6 – Lammermuir Hills will include the consented Fallago Rig wind farm...We feel that in light of this it would be worthwhile the designation statement acknowledging this significant scale of development as an indication that such development can be accommodated without harm to the intrinsic landscape character of the upland plateau</p> <ul style="list-style-type: none"> - We consider that it is also important to acknowledge that such areas have an important role to play in the medium term in meeting renewable energy needs and this is also a factor which must be balanced against other appropriate needs. - I am surprised that there are no penalties levied against those that are recognised in your document as having compromised designated landscapes and even undesignated landscapes of natural beauty, or adjacent to designated areas that are clearly part of the overall vistas. There is no such process? Shouldn't something be included in this document? Where are the 'teeth' to the goals of the document? Here, I 	<p>Evaluation Sheet for the LCU UP2 Lammermuir Plateau.</p> <p>It is considered that such penalties are outwith the scope of planning policy</p>	No further action
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		<p>draw a distinction between normal rural activities and, to be kind, the over-exuberant industrial forestry and excessive development of industrial-scale wind electricity generation facilities (wind farms). We are losing our natural visual resource bit by bit, and as we lose them at a local scale, this appears to condemn wider areas for the future; this is quite wrong. Just because there may be one wind generator in an area shouldn't mean there can be a thousand!</p> <p>Unfortunately this may be an unforeseen result of your (collective) document.</p> <ul style="list-style-type: none"> - Under Scottish and UK planning policy, the development of wind energy is already a serious threat to all coastal and upland landscapes- and even now lowland landscapes are under threat. Actually nowhere is safe from industrial scale aero-generation. There will be nothing left. I find this quite reprehensible, and do not see how this document will make any significant difference for the long term protection of visual resources (for local people and tourism). It simply makes current government policies easier to implement instead of protecting local environments. So 	<p>The Local Landscape Designation Review is an independent study using a robust methodology, in line with Historic Scotland and SNH national guidance. As a result the findings of the review are considered to have significant justification behind them. This should result in better protection for the proposed Special Landscape Areas.</p>	<p>No further action</p>
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	Berwickshire Civic Society	<p>our Scottish heritage is sacrificed for some daft idea that we can mitigate global warming?</p> <ul style="list-style-type: none"> - We also feel that any area not designated a Special Landscape Area will also be at risk from windfarm development, and that the SLAs themselves will be overshadowed by wind turbines erected in close proximity to their boundaries. This will be especially damaging to the Berwickshire coast where the designated SLA strip is extremely narrow. The Civic Society's view is that the whole of Berwickshire is a very special landscape which has already suffered severe degradation from wind farm developments and that more imaginative, varied and cost-effective types 	Please see the response to Ray Porter and Dr Ian Woollen at Issue 38.)	No further action
	Southern Upland Partnership	<ul style="list-style-type: none"> - ...it might be seen as disappointing that an area recognised as of great landscape value has had wind turbines constructed on it, it should not be forgotten that wind turbines may well be temporary structures. In 20 years it may well be that they are removed, and the landscape will almost instantly recover. There is a danger that the removal of special 	The LLDR can only fully take into account the current situation, due to the uncertainty over future development. However it is the case that the SPG will be reviewed every 5 years in line with the Local Development Plan production process.	No further action

		status risks allowing other damaging development that would have long-term impacts and thus prevent subsequent restoration. The same point could also be made where afforestation has taken place as sensitive forest design can enhance a landscape. Where poorly designed forestry has taken place in the past, restructuring can greatly improve landscape quality		
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
Statements of Importance 39.) General	SNH	<ul style="list-style-type: none"> - Support the preparation of a SOI for each of the proposed SLAs, and welcome their proposed use to inform development management decisions and influence land management practices. 	Support noted.	No further action
	Philip and Finoula Kerr; Alan Bailey	<ul style="list-style-type: none"> - These are of particular concern and need to be strengthened, as there are some significant omissions, and it is not clear from the document how those Forces for Change how there is provision for any amendment of the list of Forces included within it...there is no mention under policies B or C of any 	A significant amount of additional information has been provided through the consultation representations. The Consultants have reviewed this information and have made a number of changes to their original work. It is therefore the case that the SOIs will be updated and that this work will be	Accept changes made to Statements of Importance as a part of the appendix to the LLDR and to the updated SPG

	Save Scott's Countryside	<p>mechanism for amendment should circumstances change and this clearly needs to be addressed in the final document.</p> <ul style="list-style-type: none"> - The final SPG should therefore clarify: <ul style="list-style-type: none"> o That statements of importance may be added to or changed, should circumstances change, without the need for lengthy review processes o That just because a development is not listed under "Forces for Change" in a particular Statement of Importance does not mean that is more acceptable than those that are listed - We see that the proposed Supplementary Planning Policy B (Development Management) says that the Council will use the Statements of Importance attached to each of the proposed SLAs as a material consideration in the determination of planning applications and the SPG can therefore be used to support the Development Plan policies, as reflected by its position in the planning hierarchy. - But when one focuses down to a specific attempt at control, for example in relation to SLA 3: Tweed, Ettrick and Yarrow Confluences, the Management 	<p>presented in an appendix to the LLDR.</p> <p>It is the case that the SPG will be subject to review in line with the production of future Local Development Plans and this should be made clear in the updated SPG.</p> <p>The Local Landscape Designations Review is Supplementary Planning Guidance and is therefore a material consideration in the determination of planning applications. By employing an independent evaluation, using a robust methodology, in line with national guidance, it is considered that the findings have significant justification behind them. It is hoped that when decisions are challenged at appeal this work will help bolster the Council's position.</p>	Accept the proposed Supplementary Planning Policy B
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	<p>Mark Steele (on behalf of Graham & Sibbald for Buccleuch and Northumberla nd Estates and the Hermitage Action Group)</p>	<p>Recommendations read encouragingly enough, but in the end are only recommendations.</p> <ul style="list-style-type: none"> - ...in the case of management recommendations it is considered that, as a general point, the Council should set out how it intends to manage or influence the forces for change and/or management issues that do not fall within its statutory remit as Planning Authority - ...the descriptions should not be seen as limiting in that forces for change can have a wide ranging effect on a range of landscape types 	<p>Only a certain level of detail can be provided in the descriptions of forces for change due to the uncertainty over future proposals. Each planning application is reviewed on its merits and effects will vary dependent on where development is proposed and the landscape involved. The SPG is subject to review in line with future Local Development Plan production.</p>	<p>Accept addition of words to the SPG to explain the level of detail that can be provided in forces for change.</p>
<p>40.) Tweedsmuir Uplands</p>	<p>Terence O'Rourke for Wind Energy</p>	<ul style="list-style-type: none"> - in the section titled 'Management recommendations' the third bullet point seeks to maintain the undisturbed wild land character of the great majority of the hills. However whilst these hills may be relatively remote and be perceived to have some wild land characteristics, they cannot be described as wild land or undisturbed wild land. This area is not within an SNH wild land search area and would not qualify for wild land or wildness status under SNH's policy statement on 'Wildness in Scotland's Countryside' 	<p>The Steering Group decided it was appropriate to change the criteria name from 'Wild Land' to 'Wildness' to better reflect SNH's policy statement on 'Wildness in Scotland's Countryside'. SNH state that "A distinction is drawn between wildness- the quality enjoyed- and wild land, or places where wildness is best expressed. While wild land has normally been identified in the uninhabited and remoter areas in the north and west, the quality of wildness can be found more widely in the countryside, sometimes quite close to</p>	<p>No further action</p>

		<p>and therefore it is misleading to refer to their 'wild land character'</p> <p>- We would request that the design statements for each SLA take into account the nuances of the area and that they recognise that within the SLA there are different landscapes. Tweedsmuir Uplands...appears to take the best aspects of the landscape and does not provide an accurate picture of the overall unit. Views are inaccurately represented and man made influences are downplayed. The comments under the heading recent development within the old AGLV designations should be added as a heading to the landscape character unit assessment sheets as this would ensure recent development is included and therefore man made influences are correctly assessed. It must be remembered that forestry plantations are a man made influence and pylons must also be taken into account. The influences of existing and</p>	<p>settlements" (SNH 2003: 1).</p> <p>It is also the case that SNH have recently published a "Wildness Map" of Scotland. This map shows that parts of the borders, including the Tweedsmuir Uplands show wildness characteristics which are put at the 'high' end of the spectrum.</p> <p>As a part of the re-examination of the proposed Tweedsmuir Upland SLA the boundary has been expanded westward and northward, the main result of this is that the LCU UP09 Culter Fell is also included. (please see Issue 29.) on p56 for justification of this change).</p> <p>The evaluation of each LCU (UP09, UP07 and UP08) has been undertaken independently by the Consultants and this is considered to be defensible. A number of man made influences and their context within the landscape have been mentioned in the respective evaluation sheets.</p>	<p>Accept the revised Tweedsmuir Upland cSLA boundaries; west to the authority boundary and north to include Broughton Heights.</p>
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		approved wind farms both on the direct area on which they are located and also the surrounding area should also be taken into account.		
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	<p>Walkerburn and District Community Council</p> <p>Terence O'Rourke for Wind Energy</p>	<p><i>necessary, to restore or enhance the character of the area and may use conditions of planning agreements to achieve these objectives"</i></p> <ul style="list-style-type: none"> - There was a general consensus amongst Community Council members that the draft model policy given in Section 10 of the consultant's report, and attributed to SNH, was more robustly expressed and might be incorporated into Section 7. - ...the justification text supporting Policy B appears, as worded, to elevate the Local Landscape Review above the SPG in importance in development management decisions. Given that the LLDR is a supporting document to the SPG we suggest that the wording be amended along the lines "The policy aims to ensure that the SPG and its supporting Local Landscape Review (Annex 1 to the SPG), are to be considered in the development management process" - 	<p>It is considered the final sentence of Policy B is clear on the position of the SPG in the planning process: <i>"The SPG can therefore be used to support the Development Plan policies, as reflected by its position in the planning hierarchy"</i></p>	<p>No further action</p>
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	Chris Litherland	<p>eastern Borders, so this needs to be properly addressed, perhaps specifically.</p> <p>- It would be helpful to clarify the extent to which designation as a SLA affords protection from development which may be described as inappropriate. The document itself implicitly acknowledges that the concept of AGLV, which the proposed SLA definition is intended to replace, was itself devalued by failure to prevent inappropriate development. This is particularly true of the Eastern Lammermuirs where, as the document acknowledges, the designated AGLVs as so seriously compromised by excessive windfarm development and inappropriate commercial forestry as to make it unsuitable for inclusion in the proposed new SLA definition. It would be helpful if the document were to indicate how the risk of destruction of such sensitive environments would be guarded against in the future and, particularly, how this policy document would seek to do that.</p>	<p>improved through better policy direction.</p> <p>Please see the responses above to Issue 43</p>	<p>State explicitly that there will be no change in the level of protection. Accept introduction of Statement of Importance for each respective SLA.</p>
	Neil Bryce	<p>- In 1962 there were 130,000 hectares in this region which it was intended,</p>	<p>The figures quoted in the representation do not tally with</p>	<p>State explicitly that there will be no change in the level of protection.</p>

	Neil Bryce	<p>should be protected from inappropriate development under AGLV and NSA status. This has subsequently been eroded to the current area of 115,000 ha. The proposed SLA's, while they have altered the balance of protected areas, have also seen this further reduced to 110,000 ha, representing a total loss of 20,000 ha (15%) since the 1960s</p> <ul style="list-style-type: none"> - At some point in the future, some of this hitherto protected land will in all likelihood become susceptible to inappropriate development of some form or another - This loss may be viewed by some as insignificant but with a relatively limited land area the size of the Borders with its' diversity of landscape types, any reduction of protected land should be resisted. here are much greater range of threats of inappropriate development to the scenic assets of the Borders now than there were half a century ago, which suggests that the areas deserving of protection should at least be maintained and most certainly not reduced. <p>- A proviso that repeatedly appears in</p>	<p>those in the LLDR or as held by the Council. It is unclear how the reduction asserted has been established. With regards to the potential for inappropriate development please see the responses under Issue 43.) above</p> <p>It is not possible to know</p>	<p>Accept introduction of Statement of Importance for each respective SLA.</p> <p>No further action.</p>
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	<p>Ian Kelly, Graham and Sibbald for Buccleuch and Northumberland Estates and Hermitage Action Group</p>	<p>the report is that protection may be overruled if there are deemed to be “social and economic benefits of national or local importance” This immediately brings to mind the contentious question of the Lammermuirs, a prime location for wind power, this was an area supposed to be protected by its’ AGLV status, but has become despoiled by wind turbines to the extent that it is now happily described by developers as a “well established wind farm landscape”. It is noted that the remainder of this area has been awarded provisional SLA status, but in the light of previous experience, what is this really worth?</p> <p>- ...the main forces for change considered within the SLA consultation document clearly represent forms of developments that can be located near, but not in an SLA, yet still have effects that impact on the SLA. This is a matter that is often debated at wind farm Public Inquiries and it is considered that it would be appropriate for the Council to specifically address this aspect both in the SLA assessments themselves and in the related planning policy</p>	<p>precisely what development will come forward in the future. The objective of the LLDR study was to undertake an independent study using a robust methodology, in line with national guidance, to produce findings with significant justification behind them. It is considered that this approach will provide the best policy response possible given future uncertainty.</p> <p>Please see the response to Neil Bryce above (under Issue 43.)</p>	<p>No further action.</p>
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	Ray Porter	<p>linkages. This would provide clarity both now and for future proceedings.</p> <p>- ...both this document and NPF2 are disappointingly light in terms of, for instance, what constitutes circumstances in which: “designation of the landscape will not be compromised or any significant adverse effect is outweighed by social or economic benefits of national importance”</p>	Please see the response to Neil Bryce, above Ian Kelly response (under Issue 43.)	No further action
44.) Land as Special v non-special	Chris Litherland	<p>- I am concerned that the methodology outlined in the document appears to display a lack of subtlety in defining a SLA. To take the document at face value, the methodology appears to suggest that some areas are “special” while, by logical extension, the remainder are “ordinary”. In addition to the boundary/line-of-sight issues alluded to above, this approach comes dangerously close to declaring “open season” on areas which are not deemed to have made the grade. It is clearly nonsense to assert that a matter of a few hundred yards makes a difference between special and ordinary when dealing with an area as beautiful as, say, Upper Tweedsdale yet unless a more flexible approach</p>	The object of the LLDR was to identify the “best” of the Borders landscapes and to provide statements of importance to ensure better protection and enhancement of these areas. It is not the case that if an area is not designated an SLA that it is “open season”. The Council will presume against developments with an adverse impact on the landscape whether in an SLA designation or not.	No further action

	Ray Porter	<p>can be found, that is precisely what this document appears to do. I am concerned that this lack of flexibility may be exploited by developers and planners in justifying development with a high level of environmental impact on the basis that "SBC do not regard this area as warranting special status".</p> <ul style="list-style-type: none"> - Particularly concerned that by giving certain areas the special status of SLA, by definition other areas are deemed not to be 'not special'... 	Please see the response to Issue 44.)	No further action
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Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Methodology</p> <p>45.) Study Methodology 1</p>	<p>Mr Robert Maguire OBE FRSA</p>	<p>Executive Summary</p> <ul style="list-style-type: none"> - The poor extent of protected landscapes in the Scottish Borders was recognised in Policy EP2, which noted that the Council had the intention of designating <i>additional areas</i>, and also by strong implication in the report (2007) on the Local Plan of Reporters R Hickman and R Bowden. The review however proposes some 4% <i>less</i> protected area. - The consultants claim the authority of <i>Guidance on Local Landscape Designations</i> published by Historic Scotland and Scottish Natural 	<p>Following the re-evaluation of the scoring and subsequent refinements it is the case that the proposed SLAs now exceed the land area of the existing AGLVs by some 23,600 ha. It should also be remembered that the figure for the AGLVs includes the two Borders National Scenic Areas, which are not included in the SLA figure. It is therefore the case that the figure for land area protected by designation (SLAs & NSAs) in the Borders has increased to 167,013 ha (a 38.8% increase on the previous proposal).</p> <p>It can be argued that the LLDR goes beyond what is called for in the Policy. This is because through the application of the independent study and robust methodology a suite of proposed Special Landscape Areas have been produced that represent the highest quality of the range of Borders landscape types.</p> <p>SNH were present on the Steering Group for the production of the SPG and the subsequent update following the consultation period. SNH state in</p>	<p>No further action but please note that this report proposes a number of additions to the proposed SLAs</p> <p>No further action.</p>

		<p>Heritage for the methodology they have developed for the task. There is however crucial deviation from that very detailed guidance.</p> <p>- A) <i>Guidance</i> states that the involvement of stakeholders – to include community organisations and the wider public – <i>from the beginning</i> is ‘<i>critical to success</i>’. No community or public consultation has taken place until the present 12- week period <i>after the Final Report was submitted</i>. This was however laid down in SBC’s <i>Project Brief</i> which at the same time stipulated that <i>Guidance</i> was to be followed.</p>	<p>their representation that they “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”.</p> <p><i>The detailed comments are considered below:</i></p> <p>The project brief (9 October 2009) states that “Public consultation on the designation of SLAs will be carried out by the Council as part of the Development Plan/Supplementary Planning Guidance processes. This will provide the main consultation with stakeholders and will include a range of communication methods to seek views on valued landscapes from members of the public”.</p> <p>It was considered that by employing the Consultants to undertake an independent study using a defensible methodology the findings would be as robust as possible, to do this an arms-length approach had to be maintained. Having said this it was the case that a Steering group, made up of relevant Council and SNH staff helped advise the Consultants.</p>	<p>No further action</p>
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		<p>- B) <i>Guidance</i> quotes the European Landscape Convention in defining a landscape as an area 'as perceived by people'. For purposes of evaluation, however, the whole area</p>	<p>Having stated this, the Council has stuck to the consultation set out in the Project Brief. The LLDR formed part of a Draft Local Landscape Designations SPG and both documents were subject to a 12 week consultation period running from August to November 2011, a standard period for Supplementary Planning Guidance produced by the Council.</p> <p>As a part of this consultation over 200 potential respondents were contacted and the LLDR was also placed on-line and in Council Contact Centres. As a result over 120 individual responses were received from a variety of local authorities, campaign groups, developers and individuals. These representations have been analysed by the Consultants and where additional value has been raised revisions have been proposed. These revisions are recommended for approval at the Council's Planning and Building Standards Committee.</p> <p>It is correct to say that the basis for the study is based on the Scottish Borders Landscape Character Assessment (1998). The <i>Guidance</i> (SNH/HS), as noted, states that the process "should</p>	<p>No further action</p>
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		<p>of the Borders was cut into the units which had been delineated for a previous landscape report concerned with description of character of different types of terrain, units which - though valid for their original purpose – bore no relationship whatever to landscapes ‘as perceived by people’. This was despite explicit warning in <i>Guidance</i> that ‘characterisation’ and ‘designation’ are not to be confused.</p> <ul style="list-style-type: none"> - One example of this faulty methodology is that a valley floor is evaluated quite separately from its enclosing hills, separate ‘scores’ being given to each in a desk exercise. Although later there is an attempt in limited fieldwork to relate the one to the other if the scores merit it, the process is artificial and inadequate, and results in landscapes of popularly acknowledged value being omitted. - Another result is that ‘broad’ landscapes, such as that famously to be seen from Carter Bar, are totally excluded from consideration by the piecemeal nature of the methodology. The Project Brief draws attention to the inclusion of aspects of the Borders Landscapes concerned with culture, 	<p>begin with the landscape character and historic land use reports prepared for each local authority area”, but should go beyond this”. The LLDR is designed to do just this. The methodology allows key landscape relationships to be identified to ensure that the wider landscape is given consideration. Again it should be noted that SNH have stated their support (p94 above)</p> <p>It is acknowledged that any selected boundary is to some extent arbitrary, and will exclude some areas which are visible from a certain point. A landscape “as perceived by people” is not intended to be synonymous with a viewshed, i.e. the total area that can be seen from a single viewpoint. The SLA approach is also not designed to protect viewsheds, either from within valleys or from hilltops.</p> <p>Carter Bar is dealt with at Issue 1.)</p> <p>Cultural Qualities formed one of the criteria that were evaluated. One of the benefits the consultation period has brought has been the significant amount of additional information that has come from respondents regarding cultural</p>	<p>No further action</p>
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		<p>history and ‘spiritual associations’; these typically relate to broad tracts of land which are recognised by the people living in them as possessing such a cultural unity.</p> <p><u>Summary of Main Points</u></p> <ul style="list-style-type: none"> - <i>Guidance on Local Landscape Designations 2005 (HS/SNH)</i> is a very comprehensive document, but does not prescribe a fixed methodology, leaving it to Local Authorities to develop their own, appropriate to the particular requirements of their areas. The extent to which, and the manner by which, the consultants developed an appropriate methodology must be gauged by the departures and omissions from the guidance given... - Two points arise (<i>from phase 1 of the methodology</i>) <ol style="list-style-type: none"> 1. Phase 1 is entirely desk based. At the end, fieldwork is planned but no working visits to the Borders landscapes are said to form part of the process throughout this stage. 2. Paragraph 3.2 makes no mention of the stakeholder workshop, the 	<p>importance of respective Borders’ landscapes.</p> <p>It is agreed that the <i>Guidance</i> (SNH and HS) does not prescribe a fixed methodology and leaves it to Local Authorities to develop their own. However in this case, to ensure as robust findings as possible, independent Consultants were contracted to develop a methodology.</p> <p>Please see the response on consultation under Executive Summary at Issue 45.)</p>	<p>No further action</p> <p>No further action.</p>
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		<p>only item appearing in bold type in Figure 3.1</p> <p>Since the claim is made that the method and approach are based on <i>Guidance (HS/SNH)</i> – paragraph 4-4 in that document is of the utmost relevance, since it states: <i>“The involvement of stakeholders in each phase of the designation process is critical to its success...Particular care should be taken to identify the key stakeholders, including both local communities and the wider public. It may also be necessary to devise strategies which allow for each of the stakeholders to be meaningfully involved without jeopardising the rigour of the selection process...”</i></p> <ul style="list-style-type: none"> - During Phase 1, no consultations took place with community organisations (eg Community Councils) or the wider public, ‘critical to success’ of the designation process. - SBC’s <i>Project Brief</i> sets out (at para 7.2) only one public consultation period, of 12 weeks, at the point where the whole process is already a <i>fait accompli</i>. It is during this 12-week period – to which no prior notice was 	<p>It is incorrect to state that “the whole process is already a <i>fait accompli</i>”; instead the Consultation period was designed to present the Draft SPG of which the LLDR was a part. As stated, the Consultants have since analysed the consultation representations and, where additional value was found, have suggested revisions.</p> <p>The Council attempted to notify as many people as possible; correspondence was sent to over 200</p>	<p>No further action.</p>
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		<ul style="list-style-type: none"> - <i>Diagrams are provided to illustrate the difference between a landscape as 'as perceived by people' and a landscape character area</i> - From this it will be evident that a landscape considered as an entity, 'as perceived by people', is far more than the sum of its parts. It does therefore seem illogical to start the search for 'special landscapes' by dividing up the Borders region into the 76 relatively small pieces referred to...(which) are in fact none other than the Landscape Character Areas taken from <i>The Borders Landscape Assessment</i>, but in several cases divided up further. - Thus for instance, a valley landscape, as people perceive it and know it, with its dynamic visual changes as traversed, its historical associations and cultural connections with the world beyond, is treated as composed quite separately (and in different places in the report) of a valley floor and then of hills – not as bounding hills but hill groupings, broad upland tracts. These separate pieces have their quite proper origin in <i>The Borders Landscape Assessment</i> arising from criteria such as geology, soil cover, vegetation 		
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		<p>types and land use, but each is subjected in the Review to a desk-top process to 'evaluate' – quantitatively – its rating in a range of <i>qualities</i>, a process for which it is disabled by the lack of its true context in a total landscape</p> <ul style="list-style-type: none"> - (the process the Council asked for in the Project Brief and the Task/Work Stage and Comment columns on) is contrary to the <i>Guidance (HS/SNH)</i> in that stakeholder consultation, not discussion with the Steering Group, is crucial to success in these early stages...(in doing this) crucial – information to be gained by consultation with 'the wider public' in carefully-organised meetings, where the consultants would have learned about landscapes which are seen as <i>special</i> by people, landscapes which accord with the third of the criteria laid out with great clarity at para 7.4 in SBC's <i>Project Brief</i>: "Landscapes which are valued by the public, instil community identity and provide a strong sense of place" - It is to be noted that the first fieldwork in the entire exercise comes at the start of this Phase and consists, not of preparation "to inform decisions on the character and qualities of their 		
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		<p>landscapes which local people agree to be particularly important”, but, apparently, in checking-out the desk work. Discussions with the Steering Group (which did not include community representatives) led to some revised (quantitative) evaluations of the LCAs. What followed was a well intentioned manipulation of the LCA mosaic, to put together groupings of the higher scores and weeding-out bits of LCAs which seemed less interesting – a procedure which, founded on a misunderstanding of the true nature of the total task from the beginning, could not have produced other than the astonishing, almost unbelievable result with which the Borders communities are faced</p> <p>- Also to be noted is that no public consultation forms part of Phase 2.</p>	<p>Please see the response under Executive Summary at Issue 45.)</p>	<p>No further action.</p>
<p>46.) Study Methodology 2</p>	<p>Professor Gordon Hughes</p>	<p>- The fundamental fault in the methodology is the use of the quantitative ‘scores’ from this piece-by-piece examination to put together blocks of pieces which have attained more than an arbitrarily chosen score, in order to define ‘areas of</p>	<p>It is acknowledged that any selected boundary is to some extent arbitrary, and will exclude some areas which are visible from a certain point. A landscape “as perceived by people” is not intended to be synonymous with a viewshed, i.e. the total area that can be seen from a</p>	<p>No further action.</p>

		<p>search' for Special Landscape Areas...The results in the boundaries of Special Landscape Areas, 'robust' as they may be as requested in the Project Brief...are also often in the middle of valleys, dividing 'a landscape as perceived by people' into a protected zone and an unprotected one – a result which seems pointless by the very terms of the exercise.</p> <p>- Broad landscapes are denied consideration by the methodology. Yet the Borders Hills (which of course includes their valleys) are generally recognised as being a landscape 'entity' and of special character. <i>Guidance (HS/SNH)</i> quotes NPPG 14 Natural Heritage which refers to Border Hills and <i>Natural Heritage Futures: Border Hills (SNH)</i> also references them.</p>	<p>single viewpoint. The SLA approach is also not designed to protect viewsheds, either from within valleys or from hilltops.</p> <p>It should be noted that SNH were present on the Steering Group and their representation states they "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".</p> <p>In addition Land Use Consultants have wide experience in undertaking landscape designation reviews with projects completed in Fife, Edinburgh and Northumberland.</p> <p>The <i>Guidance (SNH/HS 2005)</i> states that the process "should begin with the landscape character and historic land use reports prepared for each local authority area", but should go beyond this". The LLDR is designed to do just this. The methodology allows key landscape relationships to be identified to ensure that the wider landscape is given consideration. NPPG 12 Natural Heritage was replaced by Scottish Planning Policy (2010). The LLDR</p>	<p>No further action</p>
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		<p><u>Summary of Main Points</u></p> <ul style="list-style-type: none"> - The analysis rests entirely upon identifying and scoring a number of landscape characteristics for the different landscape units covered by the study using what is technically known as an ordinal approach. These scores are then weighted and an overall aggregate mark is constructed. This aggregate mark is then used to select a subset of landscapes for inclusion in the designated landscape zones... in technical terms purely ordinal information has been converted to a cardinal score that is supposed to represent the relative merits of each landscape unit. 	<p>approach is considered to be consistent with Scottish Planning Policy which states: "The natural and cultural components of the landscape should be considered together, and opportunities for enhancement or restoration of degraded landscapes, particularly those affecting communities, should be promoted through the development plan where relevant". Again it is worth mentioning that SNH were on the steering group and approved of the methodology</p> <p>The aggregation of 'ordinal' scores gives an indication as to how well a landscape performs against the defined criteria. The total 'score' is not intended to have any inherent 'meaning', but allows a comparison of relative merit of different landscapes against the criteria.</p>	<p>No further action.</p>
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		<ul style="list-style-type: none"> - Conversion from ordinal to cardinal scores is one of the most difficult areas in psychology and social science, though there are statistical techniques available which are designed to extract information from multiple ordinal measurements. It is apparent that the authors of the report are not familiar with either a) the appropriate statistical methods or b) the potential difficulties in moving from ordinal to cardinal systems of scoring. - The report fails to take account of the relationships between the landscape characteristics that are measured. As an illustration, two of these characteristics are “typicality” and “rarity”. Reasonably interpreted, these are merely opposite ends of a single scale: something which is typical of landscapes in the Borders cannot be rare and vice versa. Hence, the average of the two items – again, if consistently applied on a scale of 1 to 5 for each – must be close to 3. Either a) the averages are close to 3 in which case the items add nothing to separating different landscape, or b) this is not the case, which tells us, that the classification 	<p>It is not intended that “Typicality” and “Rarity” be interpreted as “opposites”. An example of a landscape which scores highly against both criteria is the Eildon Hills, which are both an unusual landscape feature, and also highly representative of the Scottish Borders. To avoid any confusion the “Typicality” criterion has been renamed “Representativeness”</p>	<p>Accept renaming of the “Typicality” criterion to “Representativeness”</p>
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		<p>of the characteristics cannot have been applied consistently.</p> <ul style="list-style-type: none"> - It is fundamental that any method of classification should be validated by testing a) whether the results match those generated by other methods, b) whether they are robust to variability in the data, c) whether the results can be replicated by other investigators, and d) whether any differences between the overall scores translate to something that has a clear basis in reality. There is no evidence that the authors of the report have followed even the most elementary steps required to validate the usefulness of their methodology. - It is, literally, absurd to analyse river valleys as though they have no relationship to the neighbouring uplands, but that is exactly what the study does. Indeed, the most notable change in the landscape designations which is proposed is the separation of uplands on either side of the Upper Tweed from the river valley itself. Uplands to the east are included in the proposed Tweedsmuir Uplands SLA but not those to the west. The maps are not sufficiently 	<p>LUC have wide experience in carrying out landscape designation reviews; their methodology has been developed to evaluate the subjective issue of landscape quality in, as far as possible, an objective way. It is considered that a similar study carried out by experienced landscape architects would generate similar results</p> <p>Please see the response to Issue 29.) regarding changes to the extent of the Proposed Tweedsmuir Uplands SLA</p>	<p>No further action</p> <p>Accept changes to the proposed Tweedsmuir Uplands SLA; extension of the boundary westward to the authority boundary and land to the north west at Broughton Heights.</p>
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		<p>detailed to identify which parts of the river valley are included. This runs counter to any reasonable interpretation of the importance or protecting the integrity of landscapes.</p> <ul style="list-style-type: none"> - In the western part of the area examined the study shows a marked bias against protection of river valleys. Yet, on the ground it is hard to see how the Upper Tweed, Lyne Water, Manor Water, Biggar Water, Eddleston Water can reasonably be distinguished from the Upper Ettrick or the Upper Yarrow when the nature of the links between the valleys and the neighbouring uplands are taken in account. The problem of this study is precisely that it fails to do this in an adequate and convincing manner. - There are references in the study to zones of visual influence but no serious attempt has been made to develop and apply an approach which takes account of this information. 	<p>Subdivision of landscape according to character is an appropriate approach endorsed by published SNH guidance. The LCUs were adopted from the Borders landscape character assessment with the approval of the steering group. The LLDR methodology recognises that LCUs are not entirely independent, and allows key landscape relationships to be identified to ensure that the wider landscape is given consideration.</p> <p>The SLA approach relies on defining discrete areas of landscape which can be mapped and offered protection by planning policies. The visual envelope of any landscape is likely to be extensive and irregular, and the SLA approach is not designed to give formal recognition to these. It is inevitable that development outside an SLA may have effects on views from within the SLA, however it is considered that Local Plan</p>	<p>No further action.</p> <p>No further action.</p>
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		<ul style="list-style-type: none"> - ...lack of clarity about the goals of any landscape assessment or designation permeates the whole investigation. If the consultants had thought more carefully, they might have used standard statistical techniques to identify which landscape units score high on characteristics associated with separate dimensions of landscape value and come up with a quite different short list based on one or both criteria. 	<p>policy EP2 Areas of Great Landscape Value protects against any adverse impacts occurring.</p> <p>It is considered that the goals of the LLDR are clear and that the methodology is robust and gives justifiable findings. The fact that SNH were present on the Steering Group and have expressed their support for the methodology (p103/104 above) gives credence to this position.</p>	No further action.
47.) Critique of the methodology	Ray Porter	<ul style="list-style-type: none"> - Do not see any critique of the proposed methodology, nor justification for its use. It would be helpful if competing methodologies were described and their relative merits evaluated. What is international best practice and has it been applied here? Have other Local Authorities determined that more than 50% of their landscape character units should be designated as SLAs? Has the chosen methodology been used elsewhere, 	<p>The methodology is based on SNH <i>Guidance on Local Landscape Designations</i>, which is the starting point for any local landscape designations study. Similar approaches have been used elsewhere in Scotland. We are unaware of international approaches. It is incorrect to assume that 50% of LCUs have been designated as SLAs. The 50% cut-off has not been applied in order to determine SLAs, only to field work</p>	No further action.

		<p>and is it the most popular methodology used today? If not, why not?</p> <ul style="list-style-type: none"> - note the statement under 'methodology and approach' that: <i>"Local Plan developments were used to identify key areas of future change in order that these proposals can be taken into account in the assessment process."</i> I am confused by this statement and concerned. Surely, a landscape is "special" regardless of any future change or development? This would suggest otherwise and that the SLAs have been influenced by proposed future change. 	<p>Issues 43.) and 44.) (p94-109) are two respective critiques of the methodology as submitted by two respondents with experienced backgrounds in landscape assessment.</p> <p>The statement refers to the exclusion of settlements and the allocations located within them.</p>	<p>No further action.</p>
48.) Subjectivity of criteria	Ray Porter	<ul style="list-style-type: none"> - Many of the landscape quality and character criteria used are subjective in nature – for example, the habitat value, scenic qualities, views, condition, and rarity. In my personal opinion, I do not agree with a number of the assessments in the document and I suggest that this would be true of many people. This is to be expected, as they are individual's assessments against subjective 	<p>Landscape is a subjective matter. The LLDR seeks to look at landscape in an objective way as possible, following an approach based on established SNH guidance and using expert independent opinion in the form of the Consultants. While there may be disagreement about individual evaluation findings, overall it is considered that the LLDR is a robust basis for defining cSLAs. The SNH Guidance provides a much more</p>	<p>No further action.</p>

		criteria. I do not believe that this subjectivity has subsequently been recognised in the way that the criteria have been used in assessing the relative merits of the landscape character units.	objective means of identifying SLA than was the case for AGLVs where no justification exists.	
49.) Approach of East Lothian Council	Chris Litherland	- I understand that East Lothian Council has proposed adopting an approach which considers, inter alia, the height of structure appropriate within the context of the landscape. This appears to represent a more flexible policy design which goes some way to addressing the problem of a potentially crude “sheep and goats approach” which may result from the proposal which is presented for discussion here.	It is assumed that the document referred to is the <i>‘East Lothian Supplementary Landscape Capacity Study for Smaller Wind Turbines’</i> . This document has entirely different aims to that of the Draft Local Landscape Designations SPG. The purpose of designating SLAs is to protect the most special areas of landscape in the Borders and not to state where certain developments can and cannot take place. The Council does have a Wind Energy SPG (which was produced in May 2011) and is in the process of producing a Technical Advice Note in relation to smaller turbines in Berwickshire.	No further action.
50.) Selection of area of search	Infinis/SKM	- Despite this, Infinis has concerns about the application of this approach in regard to the identification of the Area of Search. - Infinis is of the belief that... ‘third’ test offers a generous selection criteria.	Other lower-scoring areas were included... This is not a departure from the methodology, which states <i>“Where there is a lack of obvious boundaries, it has occasionally been necessary to move outwards and to include areas of</i>	No further action.

		<p>The wording above clearly infers that this will produce a list which can then be reduced through examination, distilling the list down to those that are deemed worthy of designation. Given the generosity of this starting point, it would appear unnecessary to then subsequently add to this list</p>	<p><i>lower merit, rather than to move inwards and reduce the area of higher merit landscape included within the cSLA, particularly where this has an impact on the integrity of the area in question”</i></p>	
	Ray Porter	<ul style="list-style-type: none"> - Given the wealth of landscape beauty and variety in the Borders, I would argue that far greater than 50% of it is special. 	<p>The term ‘Special Landscape Area’ is recommended by SNH, and does not imply that other areas are ‘not special’. Other areas are covered by criteria based policies which include consideration of landscape character</p>	No further action.
	John Muir Trust	<ul style="list-style-type: none"> - It appears that the thresholds at each step of the scoring system were too sensitive and over selective, with only 50% of LCUs subject to detailed field work, and only the highest scoring 1/3 of those being examined in greater detail. The latter threshold was in the accompanying consultant’s report as “an arbitrary cut-off”, therefore it cannot be assumed that the 1/3 selected for further consideration was necessarily the right proportion or balance of sites - Furthermore, the weighted score of 50 points set as the threshold for inclusion as a potential SLA has 	<p>50% of higher-scoring LCUs were selected for detailed survey in the field. The remaining 50% were visited in order to check the desk based assessment, and where the desk-based assessment was found to be inaccurate, a detailed field survey was carried out. In this way, somewhat more than 50% of LCUs were surveyed in detail. The aim of the study was to identify a representative sample of the ‘best’ landscapes of the Borders, and it is considered reasonable therefore to focus on the higher-scoring areas. It was never the intention to designate 50% of the Borders, and 50% therefore</p>	No further action.

	<p>Terence O'Rourke for Wind Energy</p>	<p>clearly resulted in the exclusion of a number of important areas, particularly those currently covered by local designation as AGLV.</p> <p>- Paragraph 3.6 - field survey states, that "The highest scoring 50% of Landscape Character Units were carried forward in the process as an initial area of search for proposed Special Landscape Areas". Should this read as the highest scoring third were evaluated (being those that scored 50 points or more) as per Local Landscape Review Annex 1 page 53 paragraphs 7.24 & 7.25. Paragraph 3.7 again should this read highest scoring third not 50%.</p>	<p>presents a safety margin, including all areas likely to be considered for a designation.</p> <p>This is a mistake, it should read as suggested.</p>	<p>Accept correction to refer to refer to the highest scoring third</p>
	<p>Ian Kelly, Graham & Sibbald (for Buccleuch and Northumberland Estates and Heritage Action Group)</p>	<p>- From a planning policy perspective...the broader areas of search appear to be more reflective of the extent of the landscape that should be protected- although the absence of any proposed designated areas in the south west of the Council area is surprising. Looking at the text on pages 10-13 of the consultation, some of the reasons for rejecting areas seem very weak.</p>	<p>It would not have been appropriate to simply use the area of search because it is based on pre-defined LCUs from the Borders Landscape Character Assessment and not on landscape quality. As the Consultants note in para 3.25 (p14 of the LLDR) 'significant variations in landscape quality can occur across LCUs'.</p> <p>This issue was tackled through application of qualitative analysis- identifying which parts of the area of search performed well against the</p>	<p>Accept updated Appendix to the LLDR</p>

	<p>Mark Steele (on behalf of Graham & Sibbald for Buccleuch and Northumberland Estates and Heritage Action Group)</p>	<p>- ...it is apparent from the qualitative analysis from each LCU...that they are in fact comparative assessments which simply determine the relative merits of different parts of each LCU. Therefore the terminology used to describe the assessment should be amended in the adopted SPG</p>	<p>criteria and which parts contributed to important composite landscapes. In addition to fit with SNH/HS national guidance, practical criteria were applied, this examined:</p> <ul style="list-style-type: none"> - identity and coherence - suitable size - other policy/strategy considerations; and - boundary features <p>This work ensured the proposed SLAs were based on recognisable landscape units with a logical theme or focus and that they were an appropriate size to allow practical policy to be applied to them.</p> <p>The revision of the proposed SLAs will require the appendix to the LLDR to update pages 10-13.</p> <p>This stage of the evaluation was designed to identify sub-divisions within LCUs, and relationships between LCUs. It is considered that the wording in the SPG is appropriate to describe this stage (p9 Draft SPG).</p>	<p>No further action</p>
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	Ray Porter	<ul style="list-style-type: none"> - The document states that <i>“the initial set of cSLAs was revised based on feedback from the steering group including...the inclusion of certain areas.”</i> Beyond the areas excluded as they are already within a NSA, what other areas were excluded or included? What was the basis of such inclusion or exclusion, and how did these criteria fit with those used for the primary study to select cSLAs? Such tinkering is of concern, as is the lack of detail explaining how and why it was done 	The feedback included discussion on the overall area to be designated. The exclusion of NSAs was agreed, along with amendments to remaining areas in order that they would remain ‘coherent’. The exclusion of settlements was also discussed at this stage. Several boundaries were critiqued by the steering group. All steering group comments were reviewed in light of the stated methodology, and applied accordingly.	No further action
51.) Division of valley floor and upland hills	Ettrick & Yarrow Community Council;	<ul style="list-style-type: none"> - Question the methodology used by the Consultants: by dividing the valley floor from the upland hills, the two have become separate in the evaluation of quality - No upland river valley floor can be separated from the hills to each side. No upland valley floor can ever be seen without the hill tops which bound it and from which the river flows. The guidance notes from SNH/HS...state that the landscape means an area ‘perceived by people’, we would suggest that must mean from ridge to ridge. - Believe that the methodology chosen has produced a microscoping analysis 	Please see the response to Mr Robert Maguire OBE FRSA (Issue 45) and Professor Gordon Hughes (Issue 46)	No further action.

	Lilliesleaf, Ashkirk and Midlem CC	<p>of our valleys and one which cannot possibly convey the actual landscape character.</p> <ul style="list-style-type: none"> - Ask that upland river valleys be seen as one complete landscape, united by topography and also by their culture and history. - The views from the higher ground have often been ignored...this is particularly true of the views from places which are not main roads. It is the landscape seen from minor roads and footpaths especially on the high places which are the most spectacular. These are largely ignored by the review which makes it seem to be a desktop computer based study which ignores the human factors which makes so many of us glad to live here 	<p>Please see the response to Mr Robert Maguire OBE FRSA (Issue 45) and Professor Gordon Hughes (Issue 46). In addition, Views from high ground are not ignored (see SBC schedule of 'iconic viewpoints'), but the focus is on identifying recognised key views which can be assessed in a more objective way. The object of the LLDR is to identify landscapes requiring protection, not views as such.</p>	No further action.
52.) Application of Buffer	Southern Upland Partnership; Community Council of the	<ul style="list-style-type: none"> - Maps show a buffer zone around the Borders but give no indication of what landscape designations are found in this buffer. It would seem important to ensure that the Borders proposals fitted with the designations accepted by our neighbours. - ...the analysis fails to give adequate consideration to the overall setting of 	<p>As a result of the consultation representations, particularly concerning detail in those from SNH and neighbouring local authorities, cross boundary issues have influenced the appendix to the LLDR. Para 6.8 and Figure 6.1 of the LLDR show the wider context surrounding the Borders area</p>	Include updated Para 6.8 and Figure 6.1

	Royal Burgh of Peebles and District	the SBC area within the larger region of Southern and Central Scotland. A consequence of this is that there is little recognition of significant features and designations in the adjacent regions outside the 5km buffer zone, and attenuation of significance along the landward borders of the area.		
53.) Consultation	Southern Upland Partnership; Scottish Renewables	<ul style="list-style-type: none"> - One would have expected local communities to have been engaged in determining the boundaries of landscape units and what makes them work. However, as far as we are aware, it is only at this stage that local opinion appears to have been sought. We would suggest that some effort is put into actively engaging key communities in discussion. This would help ensure that the selected “special” areas have both public support and understanding. - While there does appear to be some commitment to consultation it seems that this is not backed up with the right level of transparency. The Local Landscape Designation guidance states that during very early consultation it is recommended that the Local Authority should seek wider public views through meetings, surveys and other contacts. However 	<p>The project brief (9 October 2009) states that “Public consultation on the designation of SLAs will be carried out by the Council as part of the Development Plan/Supplementary Planning Guidance processes. This will provide the main consultation with stakeholders and will include a range of communication methods to seek views on valued landscapes from members of the public”.</p> <p>It was considered that by employing the Consultants to undertake an independent study using a defensible methodology the findings would be as robust as possible, to do this an arms-length approach had to be maintained. Having said this it was the case that a Steering group, made up of relevant Council and SNH staff helped advise the Consultants.</p>	No further action.

	Ogilvie Jackson	<p>the commencement of the 12 week consultation period, the due consultative processes have fallen far short of the guidance recommendations. These were deemed to be “critical to the success of the appraisal”</p> <ul style="list-style-type: none"> - ...we were never consulted and strongly object to it (the Draft SPG)... It would appear that the largest landowners in the valleys have been consulted and one of them seems to have been almost excluded from the document...very strange. This document seems to have been sneaked in “under the radar” - I am somewhat concerned...in the way that the review has been handled by both SBC and the local Community Council as I, as a Land Owner I have not be notified or advised of this proposed review. - Personally, this review will inflict more restrictions to my farming practices, to which there are already too numerous to mention. 	<p>As stated at Issue 53, the Council attempted to contact as many potential respondents as possible. However we also hope for word of mouth to reach those whom we do not reach. For example, in the case of farmers/landowners we would hope that the NFU would pass details to their members.</p>	No further action
	William Renwick	<ul style="list-style-type: none"> - In response to Scottish Borders Council consultation on its proposed local landscape designation I wish to lodge my formal objection to the 	<p>Please see the response to Ogilvie Jackson at Issue 53.)</p>	No further action

	Daphne Jackson	<p>designation proposed for our land at Craigdouglas, Yarrow.</p> <ul style="list-style-type: none"> - I am somewhat concerned to say the least in the way that the review has been handled by both Scottish Borders Council and the Local Community Council as I, as a Land Owner have not been notified or advised of this proposed review. - ...I wish to object to proposed changes to the Landscape Designation for the Ettrick & Yarrow Valleys on the grounds that correct & required public consultation has not taken place - Apart from the local community council & I understand a large estate, no effort has been made by SBC to inform residents, businesses & farmers/landowners of the consultation taking place. This shows a complete lack of respect for the population of the two valleys. I personally feel very disappointed with the approach that SBC have take especially the refusal to extend the deadline & to hold public meetings requested by Ettrick & Yarrow Community Council. How can residents make informed decisions without the information required? I 	<p>Please see the response at the start of Issue 53.)</p> <p>In addition it should be noted that a consultation representation was received from Ettrick and Yarrow Community Council on October 10 2011. In addition to this a meeting with the Community Council was arranged for 4 October 2011, however EYCC sent their apologies. Requests for additional maps were also met.</p> <p>It is therefore considered that the Council's dealings with the EYCC on this matter were open and transparent.</p>	<p>No further action.</p> <p>No further action.</p>
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		<p>accept that the proposal was available on the council website but without publicity how does the public know to access it? Due to very poor broadband speeds in parts of our valleys it is not an easy task to access anything on line, besides the fact that some residents do not use computers. Surely information could have been placed in the local press, letters sent to residents & public meetings held with information available.</p> <ul style="list-style-type: none"> - The lack of consultation seems to be very short-sighted, how does SBC expect to progress this without following recommended procedures? I fear it has jeopardised any chance of agreement with the people who may be most affected 		
54.) Lack of graduation in identifying SLAs	Ray Porter	<ul style="list-style-type: none"> - The lack of graduation or subtlety in defining an SLA is of great concern. It discredits the methodology. How can a line be drawn separating SLAs from non-SLAs? How can a metre make the difference between an area being special or not special? Clearly, this is nonsense. More subtlety of definition is required...there should be a greater range of different landscape designations (say 10?). - Why not start with the whole of the 	<p>These approaches are not supported by national policy or by SNH/HS guidance, which sets out a two-tier system of National Scenic Areas and (local) Special Landscape Areas"</p> <p>The risk of employing graduated Special Landscape Areas or designating the whole of the Borders a Special Landscape Area is that the level of protection would likely become diluted. Instead it is considered better</p>	Accept approach taken in the revised Local Landscape Designations Review.

	Neil Bryce	<p>Scottish Borders being classed as special?</p> <ul style="list-style-type: none"> - Alternatively...the methodology should seek to assign numeric scores to all landscape character units across the Scottish Borders, based upon well-defined evaluation criteria. Using an agreed distribution, landscape character units could be assigned to particular bands of SLA... - There appear to be certain areas that are at odds with this directive i.e. which do not take sufficient account of the wider scenery in paras 3-3 and 3-4, "Aspects of landscape character and selecting locally important designations" the criteria taking account of Typicality, Rarity, Uniqueness, Enjoyment, Naturalness and Scenic aspects have been noticeably narrowed down in many cases. This has resulted in somewhat arbitrary demarcation lines such as watercourses, roads and contours...which do not take sufficient account of the wider scenery. 	<p>protection is offered by employing a defensible methodology to define a robust set of Special Landscape Areas.</p> <p>The criteria are drawn from the HS and SNH Guidance (2005), as set out in the LLDR report. It is not considered that they have been applied in a narrow way. It is acknowledged that any selected boundary is to some extent arbitrary. However the cSLA boundaries are drawn based on recommendations set out in the Guidance, and on the findings of the LLDR study.</p>	No further action
55.) Socio-economics	Scottish Renewables; EDF ER	<ul style="list-style-type: none"> - We are concerned that the criteria applied gives no consideration to the long term benefits of renewables developments and the positive effect 	The economic benefits of renewable energy are not a landscape matter and were therefore not considered.	No further action.

	Greenpower	<p>they can have on the local economy, along with contributing to reducing the impact of climate change</p> <ul style="list-style-type: none"> - How much consideration has been given to the current land use in these proposed LLDs, such that they may affect the potential for landowners to diversify their businesses? Along with a landscape review to propose these landscape designations, there should be a corresponding economic review to assess the potential economic/business impact the proposals may have. 	The economic benefits of renewable energy are not a landscape matter and were therefore not considered.	No further action.
56.) Scoring and weighting	John Muir Trust	<ul style="list-style-type: none"> - ...Scores can help to inform the decision-making process, but they should not be relied upon in isolation and offer no substitute for well-informed judgement. We feel that in these proposals too much emphasis has been put on the scores to the detriment of areas that the well informed would have included. 	<p>The scoring system is an attempt to form an objective view on the Borders landscapes. Whilst some application of judgement is necessary, it must be backed by clear methodology, in order to avoid subjective decisions and to enable a transparent process.</p> <p>In addition, where consultation representations provided additional information the Consultants have examined these and made appropriate changes</p>	No further action
	John Muir Trust	<ul style="list-style-type: none"> - ...the Wildness criterion should have been triple weighted as well as those 	The weighting of criteria was introduced to emphasise those qualities which	No further action

	<p>Friends of the Pentlands</p>	<p>However, this leaves the majority of the criteria un-weighted. The arbitrary decision on how to weight these (or whether to weight them) raises some questions as to how the weighting is linked back to local or national policy. A good example of this is <i>Tourism</i>, which is a component of the ‘Wealthier and Fairer’ objective as one of the Scottish Government’s ‘Key sectors of the Scottish Economy’. However the consultants chose not to apply a multiplier to <i>Tourism</i> but instead applied one to <i>Settlement Setting</i>... the methodology for linking weighting to national policy is absent- and therefore flawed, because the Tourism Key Sector report has not been taken into account yet a multiplier was applied to a non-strategic criterion such as <i>Settlement Setting</i>.</p> <ul style="list-style-type: none"> - There is a similar argument for Enjoyment - Doubtless ‘scoring’ is an approved methodology, although it can hardly be precise or objective. Furthermore, the addition of weighting inevitably makes the methodology more subjective. We would urge Scottish Borders Councillors to regard the ‘scoring’ methodology as helpful 	<p>weighting was carefully tested and agreed with the Steering Group</p> <p>As a part of the revised LLDR, the Consultants re-examined scoring in the light of consultation representations, this is detailed in the updated SPG and in the respective sections of this document.</p> <p>The Consultants undertook an independent exercise to rank each of the LCUs and this is considered to be a robust and objective approach to take in deciding upon defensible SLAs. In applying practical criteria to the results of the scoring, a degree of logic was applied, for example through selection</p>	<p>No further action</p>
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	<p>Malcolm & Sandra McGregor</p>	<p>guidance but to apply a generous dose of common sense when considering recommendations based on that methodology</p> <ul style="list-style-type: none"> - converting qualitative data into quantitative data is fraught with danger and once done, aggregating the numeric values obtained can lead to misleading and confusing results...if a ranking of a habitat is given a 'score' of 4, compared to another landscape area being given a ranking 'score' of 2, one cannot conclude that the former habitat is 'twice as good' as the later. You can only conclude that one of the habitats, from the observer's viewpoint, is better than the other. - Trying to aggregate is problematic also: if one considers UF36 for example, the phase 1 score is 3, (= High) and the Designation score is 0,(= not sure/ no habitat?) yet a 'combined' score of 2 is concluded and this is converted back to a 'habitat value rank' of 'Medium'. It is very difficult to draw a meaningful conclusion here. 	<p>of coherent areas and appropriate boundaries.</p> <p>The aggregation of 'ordinal' scores gives an indication as to how well a landscape performs against the defined criteria. The total 'score' is not intended to have any inherent 'meaning', but allows a comparison of relative merit of different landscapes against the criteria</p>	<p>No further action.</p>
	<p>Graham & Sibbald</p>	<ul style="list-style-type: none"> - ...it would be helpful to know, within the SPG rather than in technical appendices, how these criteria were 	<p>It is considered that the relevant information is contained within the Appendix to the SPG, the Local</p>	<p>Please reference the Appendix to the SPG, the Local Landscape</p>

		<p>weighted. It would also be helpful to know, within the SPG, how the criteria integrate in the assessment- for example, typicality and rareness are opposites but intactness and wildness are completely separate attributes. Also it is clear from the assessment of forces for change elsewhere in Scotland, that wildness and wild land characteristics are becoming even scarcer and thus more precious in a planning policy sense. It should be made clear, in the SPG, how wild land characteristics feature in the SLAs.</p> <p>- ...the cultural landscape, especially the historic cultural landscape, often does not secure the degree of designation/planning policy protection that it should have...therefore, it falls to documents such as this SLA consultation to address this key aspect of landscape. The outcome, in the form of the suggested SLAs, would tend to suggest that either insufficient weight has been given to this aspect or that the search for large contiguous areas for designation has not then resulted in the identification of key "settings" as potential SLAs. The outcome is that importance and identifiable cultural heritage</p>	<p>Landscape Designations Review.</p> <p>Typicality and Rarity are not intended to be interpreted as 'opposites'. An example of a landscape which scores highly against both criteria is the Eildon Hills, which are both an unusual landscape feature, and also highly representative of the Scottish Borders. However to avoid confusion the "Typicality" criterion has been renamed "Representativeness"</p> <p>Many important cultural heritage assets are included in SLAs (e.g Floors Castle, Traquair House etc). In addition Policy BE1 Listed Buildings and Policy BE2 Archaeological Sites and Ancient Monuments protect the setting and status of designated buildings and sites in the Borders.</p> <p>Hermitage Castle is dealt with at Issue 32</p>	<p>Designations Review</p> <p>Accept the criteria chosen as a part of the methodology of the Local Landscape Designations Review. Accept the renaming of "Typicality" to "Representativeness"</p> <p>No further action</p>
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	<p>Manor, Lyne & Stobo Upper Tweed Community Councils</p> <p>Mark Steele (on</p>	<p>landscapes, such as that around Hermitage Castle, are not designated as proposed SLAs. They are, as a result, not provided with the designation basis for planning policy protection. It is submitted that this aspect of the SLA assessment needs to be repeated with a view to identifying key cultural heritage landscapes for designation and protection through the land use planning system.</p> <ul style="list-style-type: none"> - There is no evidence in the Review document that ‘the profound links between this cultural heritage and the natural heritage’ have been considered. The broader landscape is excluded by the myopic nature of the methodology - ...weighting by “Settlement Setting” and “Views” is inappropriate i.e. it is only worth saving if it can be seen <p>- LLDR paragraph 7.20 explains that</p>	<p>The criteria for weighting were selected to emphasise those qualities which were considered by SBC to be most indicative of landscapes meriting protection, this was carefully tested with the Steering Group. The Council does not consider it is a case of “saving” landscapes; rather it is giving additional protection to the “best” examples of Borders landscapes.</p> <p>The criteria for weighting were selected</p>	<p>No further action</p> <p>No further action</p>
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<p>behalf of Graham & Sibbald for Buccleuch and Northumberland Estates and Hermitage Action Group)</p> <p>Archie Hunter</p>	<p>the weighting system was introduced <i>'In order to reflect the importance of those criteria which are most influential in the perception of 'special landscapes'...</i>' However the application of a triple weighting to the 'settlement setting' criterion distorts the scoring at the expense of the Scottish Borders more remote and in many cases <i>'special landscapes'</i>. Therefore either this criterion should not be weighted or the 'wildness' criterion should be given a triple-weighting to produce a balanced assessment.</p> <p>- ...such a scoring system can only be subjective. These subjective scores for some of the criteria were then given a further weighting...a very dubious approach in statistical methodology. How were these figures arrived at? Why was tourism, a very important part of our economy, given no weighting at all?</p>	<p>to emphasise those qualities which were considered by SBC to be most indicative of landscapes meriting protection, this was carefully tested with the Steering Group. The Project Brief (p4 2009) noted that there was a perception that upland areas dominated the existing AGLVs and that any work should review the coverage of AGLVs. Triple weighting of the wildness criterion was considered however it was felt the results skewed the findings in favour of upland areas. This was not considered to be representative of the coverage of 'special' Borders landscapes.</p> <p>The scoring system is an attempt to form an objective view on the Borders landscapes. Whilst some application of judgement is necessary, it must be backed by clear methodology, in order to avoid subjective decisions and to enable a transparent process.</p> <p>In addition, where consultation representations provided additional information the Consultants have examined these and made appropriate changes</p> <p>The weighting of criteria was introduced to emphasise those qualities which</p>	<p>No further action</p>
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			were considered by SBC to be most indicative of landscapes meriting protection. The weighting was carefully tested and agreed with SBC and SNH. Following the Consultation period and in agreement with SNH the wildness rankings were re-examined using SNH's relative wildness data, this resulted in scoring changes in some areas, as detailed in the updated SPG.	
57.) Rater Bias	Malcolm and Sandra McGregor	- ...it is basically an 'Observational' study and as such is highly susceptible to 'observer' or 'rater' bias. It is clear in the field study survey of the Scottish Borders more than one LUC surveyor was operating. The potential bias in observer ratings can to some extent be controlled providing LUC have carried out an 'Inter-rater reliability Study' to ensure there is a high correlation coefficient between the ratings team. Was this done?	No "inter-rater reliability study" has been carried out. However, the Consultants team which carried out the desk study and field work comprised landscape architects with experience of landscape character and assessment work on a large scale. Results were reviewed across the team to ensure consistency	No further action
58.) Use of Borders Landscape Assessment	Jacobs for SSE Renewables,	- It is notable that the Draft Guidance has used the 1998 Borders Landscape Assessment as a basis and has not sought to modify boundaries to reflect changes in the landscape over time, thus there is a risk that such changes may not have been fully taken into account.	The desk-based evaluation work was checked in the field and it is therefore considered to be up to date.	No further action

Issue	Respondent	Summary of Representations to Issue	Response	Recommendation
<p>Impact on SLA of development outwith boundaries</p> <p>59.) Lack of Contiguity and adjacent development</p>	<p>Ray Porter & John Muir Trust; Manor, Lyne & Stobo CC & Upper Tweed CC Philip Mason</p>	<ul style="list-style-type: none"> - ...the system of weighting landscape units in isolation is subjective and does not take due account of the impact on adjacent areas. - I feel that the terms of reference for the Consultation Document have failed to take account of the potential for adverse large scale development impacts. Landscapes and views that meet the criteria for SLA protection in the Review are liable to be seriously damaged if inadequate consideration is given to the potential for development in sensitive adjacent areas. 	<p>Policy EP2 Areas of Great Landscape Value states “Where development proposals impact on an Area of Great Landscape Value”. It is envisaged that this wording would remain in an updated Policy EP2. Each planning application is dealt with on its own merits and whether there was an adverse impact on the SLA or not would be a decision to be taken in determination of the application.</p>	<p>No further action.</p>

	<p>Peebles</p> <p>Graham & Sibbald; Mr Robert Maguire OBE FRSA</p>	<p>a reasonable argument for revisiting the basis of designation, these earlier exercises were not undertaken in a vacuum and without evidence, and it would be quite wrong to dismiss such designation on this basis. Indeed quite the opposite – rather, there is a need to question whether sufficient argumentation has been presented to exclude previously included areas, and to ask the question “is something being missed?”</p> <p>- ...it is clear that, in using the words “adding additional areas” the Local Plan envisaged that the review would deliver a much more extensive set of protected areas. Fundamentally that is not the outcome of the SLA review process as it currently stands.</p>	<p>Following the re-evaluation of the scoring and subsequent refinements it is the case that the proposed SLAs now exceed the land area of the existing AGLVs by some 23,600 ha. It should also be remembered that the figure for the AGLVs includes the two Borders National Scenic Areas, which are not included in the SLA figure. It is therefore the case that the figure for land area protected by designation (SLAs & NSAs) in the Borders has increased to 167,013 ha (a 38.8% increase on the previous proposal).</p>	<p>Accept the findings of the revised SPG and Appendix Local Landscape Designations Review</p>
61.) Conflict of interest	<p>Ray Porter; Dr Duncan Davidson; Manor Lyne &</p>	<p>- ...concerned by the choice of Land Use Consultants to undertake the study. It counts many wind energy developers among its clients</p>	<p>The Consultants agreed not to take on any work in the Borders whilst completing this exercise.</p>	<p>No further action</p>

	Stobo CC; Upper Tweed CC			
62.) Hearing or Inquiry	Graham & Sibbald	- ...further consideration of the proposed designations should be informed by a...hearing or Inquiry at which evidence can be taken. It is submitted that such an approach could usefully be combined with a Hearing/Inquiry in connection with the Council's Wind Energy SPG	A Hearing/Inquiry is not considered necessary for Supplementary Planning Guidance. It is the case that landscape and wind energy are matters that may arise at a prospective Local Development Plan inquiry.	No further action.
63.) St Abb's Head	Ray Porter	- Why is St Abbs Head not a National Scenic Area? This place is truly unique and special -	Designation of National Scenic Areas is a matter for the Government/SNH	No further action
64.) Walking and SLAs	John Henderson for Walking Support	- The areas where I feel walkers are particularly interested in seeing an SLA designation established are as follows:- ➤ Tweedsmuir Uplands- impacting the Southern Upland Way/Sir Walter Scott Way ➤ Tweed Valley (with extension to South)- impacting the Southern Upland Way/Sir Walter Scott Way ➤ Tweed, Ettrick and Yarrow – Impacting the Southern Upland Way/Sir Walter Scott Way &	The Tweedsmuir Uplands cSLA impacts on both these paths A possible extension to the Tweed Valley cSLA is covered at Issue 18.) (Minchmoor Summit) The Tweed, Ettrick and Yarrow Confluences SLA impacts upon the respective paths	It is not considered that any further action is necessary for the points made. Accept westward extension of the Proposed Tweedsmuir SLA to incorporate the Minchmoor summit and land to the south to A708.

		<p>Borders Abbeys Way</p> <ul style="list-style-type: none"> ➤ Eildon and Leaderfoot – Impacting the Southern Upland Way/ Sir Walter Scott Way and Herring Way ➤ Tweed Lowlands – Impacting the St Cuthbert’s Way and Borders Abbeys Way ➤ Teviot Valleys – Impacting the St Cuthbert’s Way and Borders Abbey Way ➤ Lammermuir Hills – Impacting the Southern Upland Way/Sir Walter Scott Way and Herring Way ➤ Berwickshire Coast – Impacting the Southern Upland Way/ Sir Walter Scott Way and new Berwickshire Coastal Path (Nortrail) ➤ Cheviot Foothills – Impacting the St Cuthbert’s Way, Pennine Way and Dere Street/Roman Heritage Way 	<p>This is an NSA and is no longer part of a local landscape designation</p> <p>The Tweed Lowlands cSLA impacts upon both of these paths.</p> <p>The St Cuthbert’s Way cuts through the north east corner of the Teviot Valleys SLA, whereas the Borders Abbey Way crosses the entire breadth of the Teviot Valleys cSLA</p> <p>The Southern Upland Way/Sir Walter Scott Way form the southern boundary of the Lammermuir Hills cSLA</p> <p>The two paths skirt the north western edge of the Berwickshire Coast</p> <p>St Cuthbert’s Way and Dere Street are impacted by the Cheviot Foothills cSLA. This is also the case for views from the Pennine Way</p>	
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