

Transport & Environment Committee

10am, Tuesday, 27 October 2015

Pentland Hills Regional Park Boundary Bill – Response to Calls for Evidence

Item number	7.3
Report number	
Executive/routine	
Wards	All

Executive summary

The City of Edinburgh Council has been invited to provide evidence in relation to the Pentland Hills Regional Park Boundary Bill. Written responses have been submitted by the Convener to the Scottish Parliament's Finance Committee and the Pentland Hills Regional Park Boundary Bill Committee. The Transport & Environment Committee is invited to ratify these.

The responses are consistent with the Council's earlier consultation response on the proposed private members Bill ratified by Committee on 3 June 2014. These responses broadly welcome the proposal to expand the Regional Park in principle, but make it clear that any additional funding proposals would need to be carefully considered in the context of budgetary pressures, and that a further detailed feasibility study including detailed assessment of proposed funding governance and operational arrangements is required before a full assessment of the likely impact of the Bill can be made.

Links

Coalition pledges	P42, P45, P48
Council outcomes	CO10, CO17, CO19, CO20
Single Outcome Agreement	SO2, SO3, SO4

Pentland Hills Regional Park Boundary Bill – Response to Calls for Evidence

Recommendations

- 1.1 It is recommended that Committee ratifies the written responses to the calls for evidence to the Scottish Parliament's Finance Committee and the Pentland Hills Regional Park Boundary Bill Committee made by the Convener on behalf of the Council (Appendices 1 and 2).

Background

- 2.1 At a meeting of the Pentland Hills Regional Park Consultative Forum held on 30 August 2013, Christine Grahame MSP presented the idea of expanding the Boundary of the Pentland Hills Regional Park to include additional areas in West Lothian, South Lanarkshire and Scottish Borders.
- 2.2 At the Pentland Hills Regional Park Consultative Forum meeting on 28 February 2014, Christine Grahame MSP formally launched a proposal for a Bill to extend the boundary and initiated a consultation exercise ending on the 23 May 2014.
- 2.3 The City of Edinburgh's Council's consultation response was ratified by the Transport and Environment Committee on 3 June 2014 (Appendix 3).
- 2.4 In May 2015, the Pentland Hills Regional Park Boundary Bill was introduced, supported by explanatory notes and Financial Memorandum.
- 2.5 The Pentland Hills Regional Park Boundary Bill Committee was established to guide the progress of the Bill and an evidence session will be held at the Scottish Parliament on Thursday 29 October 2015. The City of Edinburgh Council has been invited to attend and provide oral evidence and a written paper in support of its position. Further written evidence was submitted by deadline of 20 October 2015 (Appendix 1). The Regional Park Manager will attend the session to support the Committee's consideration of evidence.
- 2.6 Additionally, the financial implications of the Bill will be considered by the Scottish Parliament's Finance Committee. The City of Edinburgh Council was invited to submit written evidence by the deadline of 16 October 2015. The response is attached in Appendix 2.

Main report

Evidence to the Pentland Hills Regional Park Boundary Bill Committee

3.1 The main points of the Council's written submission in support of the call for oral evidence to the PHRP Boundary Bill Committee (Appendix 1) are summarised below.

- There are potential benefits to extending the Regional Park Boundary.
- Extension would bring with it the need for capital investment in visitor facilities and ongoing revenue funding to service and maintain the Park.
- New funding, governance and operational arrangements would be required. These have not been identified at this stage.
- Further detailed feasibility work is required in order to properly assess the likely success and financial impact of the proposal.

Evidence to the Scottish Parliament's Finance Committee

3.2 The main points of the Council's written submission in response to the Scottish Parliament's Finance Committee's call for evidence (Appendix 2) are summarised below.

- As the lead authority for the existing Regional Park, City of Edinburgh Council has participated fully in the informal consultation exercise leading up to the introduction of the Bill.
- Without a further detailed feasibility study and a proposed governance and operating model, the likely additional capital and revenue costs that might arise cannot be properly assessed at this time.
- Local authority budgets are currently under intense pressure and it is welcomed that this is recognised in the Financial Memorandum supporting the Bill.
- Additional funding and resources would be required from the Scottish Government for the initial feasibility work, the establishment, and the ongoing management of an extended Regional Park.

Measures of success

4.1 Written submission has been made to both the Pentland Hills Regional Park Boundary Bill Committee (Appendix 1) and to the Scottish Parliament's Finance Committee (Appendix 2).

Financial impact

5.1 It is not clear at this stage how the Council might be asked to contribute to an extended Regional Park. Any future request for funding would be given consideration against the prevailing position of significant budgetary pressures. It is considered that additional funding from the Scottish Government would be

required to establish and operate an extended Regional Park. There is no other direct financial impact at this time.

Risk, policy, compliance and governance impact

- 6.1 The existing Pentland Hills Regional Park is a statutory designation made under the Countryside (Scotland) Act 1981. Funding, governance and management services are provided according to a Joint Minute of Agreement between the City of Edinburgh Council, Midlothian Council and West Lothian Councils. Planning policy relating to the Regional Park is contained within local authority local plans. The work of the Regional Park is guided by the current Pentland Hills Regional Park Plan.
- 6.2 The contents of this report have no significant impact on risk, policy or governance of the existing Regional Park at this time. However, should the boundary be extended, new governance arrangements would need to be established through negotiation between all five local authorities involved. This would necessitate a fundamental review of the existing governance arrangements for the Regional Park.

Equalities impact

- 7.1 The contents and recommendations of this report do not detract from the delivery of the general public sector equality duties. The work of the existing Regional Park does not infringe upon the 10 areas of rights and makes a positive contribution to 'age' (facilities, information and resources are provided to help people of all ages learn about and enjoy the Regional Park) and 'disability' (access infrastructure and other amenities are designed to be accessible to people of all abilities). A similar approach should be adopted for the management of an extended Regional Park.

Sustainability impact

- 8.1 The Pentland Hills Regional Park supports sustainability objectives by: 1) providing a managed resource for non-motorised recreation and physical activity; 2) acting as a carbon sink through the protection and enhancement of woodland, wetland and moorland; 3) enhancing the biodiversity of Edinburgh and the Lothians; 4) protecting the landscape and environmental quality of the Pentland Hills; and 5) supporting sustainable economic development of the rural economy. An expanded Regional Park has the potential to extend these sustainability benefits over a wider area.

Consultation and engagement

- 9.1 The Pentland Hills Regional Park is governed by a Joint Committee comprising elected members from all three partner local authorities: the City of Edinburgh Council, Midlothian Council, and West Lothian Council.
- 9.2 The Regional Park is advised by a Consultative Forum comprising of a wide range of interests including: farmers and land owners; recreational users; community councils; wildlife interests; Friends and other voluntary groups; sporting interests; public agencies; and national governing bodies. The Forum acts as the primary consultative mechanism for Regional Park matters.
- 9.3 A detailed consultation on the proposed boundary extension was carried out by Christine Grahame MSP prior to the introduction of the Bill.
- 9.4 Consultation and engagement on Regional Park matters is largely devolved to the Joint Committee and Consultative Forum. Their expressed views have been taken into account when compiling the attached responses.

Background reading/external references

Further background information about the existing Regional Park is available at www.pentlandhills.org

Review of the Regional Park Boundary – Report to the Pentland Hills Regional Park Joint Committee 27 September 2013.

Proposal for a Bill to Extend the Pentland Hills Regional Park Boundary - Report to the Pentland Hills Regional Park Joint Committee 28 March 2014.

'Proposal for a Bill to extend the Pentland Hills Regional Park Boundary – consultation response' – Report to the Transport & Environment Committee, 3 June 2014

Proposal for a Bill to Extend the Pentland Hills Regional Park Boundary - Report to the Pentland Hills Regional Park Joint Committee 24 October 2014

A Proposal for a Bill to extend the Boundary of the Pentland Hills Regional Park - http://www.scottish.parliament.uk/S4_MembersBills/Final_PHRP_Consultation.pdf

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Links

Coalition pledges [P42](#), [P45](#), [P48](#)

Council outcomes [CO5](#), [CO10](#), [CO15](#), [CO17](#), [CO18](#), [CO19](#), [C021](#), [C022](#)

Single Outcome Agreement [SO2](#), [SO3](#), [SO4](#)

Appendices

Appendix 1: Written Submission in Support of Oral Evidence to the Pentland Hills Regional Park Boundary Bill Committee

Appendix 2: Written evidence to the Scottish Parliament's Finance Committee.

Appendix 3: Response to in 'A proposal for a Bill to extend the boundary of the Pentland Hills Regional Park'

Appendix 1

Written Submission in Support of Oral Evidence to the Pentland Hills Regional Park Boundary Bill Committee

The City of Edinburgh Council

Pentland Hills Regional Park Boundary Bill

Written Submission in Support of Oral Evidence to the Pentland Hills Regional Park Boundary Bill Committee

1. The City of Edinburgh Council (CEC) welcomes the opportunity to provide evidence to the Pentland Hills Regional Park Boundary Bill Committee.
2. CEC is the lead authority for the existing Pentland Hills Regional Park and co-ordinates the management of the park on behalf of the three existing local authority partners: CEC; Midlothian Council; and West Lothian Council. The comments which follow are provided from the perspective of CEC only and do not necessarily represent the view of other partners.
3. Comments are set out under the questions asked in the previous call for written evidence .

Q1 What would be the benefits and disadvantages for you as a consequence of the boundary being extended?

4. The potential benefits of a boundary extension to CEC are:
 - recognition of the entire Pentland Hills range as an important part of the landscape setting for Edinburgh;
 - enhancement of recreational opportunities at a local and regional level; and
 - integration of recreation with primary land uses across a wider area.
5. As the lead authority for the existing Regional Park, CEC already has an interest in the management of the Pentland Hills beyond its local authority boundary. This is because it is agreed by all the partners involved that a holistic approach to management of the park is beneficial. This interest does not currently extend to the parts of West Lothian, South Lanarkshire and Borders that are indicated in the proposed extension. However CEC recognises that expansion of the Regional Park would be consistent with the current aims of the park, and could potentially provide opportunities for people from Edinburgh to have improved access to a wider area for recreation.

6. The main disadvantage for CEC is that extension presents a risk of dilution of resources available to provide visitor management services in the areas closest to Edinburgh and the Lothians.
7. The degree to which a boundary extension presents benefits or disadvantages may largely depend on the funding, governance and operational arrangements established to support a larger Regional Park.

Q2 Where will the funding required by local authorities to support the extension of the boundary be found?

8. Expansion of the Regional Park into the southern part of the hill range will necessarily bring with it demand for capital investment in car parking, signage, path surfacing and other visitor facilities. There will also be a requirement for ongoing revenue funding in order to allow the park to be serviced and maintained.
9. Whilst it is possible to imagine that a variety of funding sources could be engaged in order to achieve capital works on the ground, it is unclear where revenue funding might come from, other than from the local authorities. The pressure on the Council's revenue budgets is intense and likely to intensify further. It is not clear how CEC might be asked to contribute to services in an expanded Regional Park.
10. In advance of further detailed feasibility work identifying proposed funding, governance and operational arrangements and proposed levels of service, it is difficult at this stage to assess the level of funding that might be requested from CEC and to identify if, and from where such funding might be found. CEC is of the view that additional funding would be required from the Scottish Government for both a detailed feasibility study and for the ongoing operational management of an extended Regional Park. Without such funding being in place, CEC would be unable to support the Bill.

Q3 Would existing governance arrangements need to change to support the boundary extension; if so, in what way?

11. The existing governance arrangements are specific to the existing Regional Park and are based on a Joint Minute of Agreement (MOA) between the existing local authority partners. The MOA establishes the decision making, consultative and funding arrangements for the existing park and does not provide a basis for current partners to operate beyond the existing boundary. New governance arrangements would be required.
12. Researching, evaluating and negotiating a new governance structure for an extended regional park will require a significant amount of work. It would be important that this work is adequately resourced either as part of further feasibility studies, or later in the event of the extension going ahead as proposed

in the Bill. CEC would currently be unable to fund or resource this work acting in its capacity as lead authority for existing Regional Park.

Q4 What are your views on where the boundary should be located?

13. CEC does not have a strong view. It should be determined in partnership with South Lanarkshire Council and Scottish Borders Council and their local stakeholders. In the absence of such an exercise taking place, the proposed default to a southern boundary, aligning with the 'A' road network would appear to be a reasonable initial position.

Q5 Are there any equalities issues arising from the proposed Bill.

14. CEC does not currently foresee any significant equalities impact arising from the Bill. However, it may be important to recognise that the Pentland Hills is a landscape within which people work and live. While recreation can provide economic opportunities, it is important that the Regional Park is able to assist with proactive visitor management and conflict resolution where required. If recreational enjoyment of a larger area of the Pentland Hills is to be actively promoted, then it will be important that an appropriate level of management resource is provided to minimise adverse impacts on land management activities.

Further General Comments

15. In principle, CEC supports the idea of extending the Regional Park to include the entire hill range.
16. It is not clear at this stage however, whether there is a reasonable likelihood that appropriate funding, governance and operational arrangements could be negotiated between the five local authority partners involved. It is difficult therefore to assess both the future resource requirements from CEC and the likelihood of an extended regional park being successful in practice. Given that CEC is currently under severe budgetary pressure it is unlikely that CEC would be able to provide additional resource for an extended regional park.
17. CEC supports the concept of Regional Parks, and since its designation in 1987, the existing Pentland Hills Regional Park has demonstrated the benefits of active management in providing opportunities for responsible public enjoyment of the hills. Boundary extension could extend these benefits over a wider area, but only if visitor management services are properly resourced in the medium to longer term.
18. Further detailed assessment of funding, governance and operational arrangements is required in advance of a boundary extension. This represents a significant piece of work which CEC is not in a position to undertake at this time.

19. In summary, while there are potential benefits of an extension, CEC considers that additional funding from the Scottish Government is essential for the establishment and ongoing operation of an extended Regional Park. Without this being in place, CEC would be unable to support the Bill.

END

Appendix 2

Written Evidence to the Scottish Parliament's Finance Committee

The City of Edinburgh Council

Pentland Hills Regional Park Boundary Bill

Written Evidence to the Scottish Parliament's Finance Committee

1. The City of Edinburgh Council (CEC) welcomes the opportunity to respond to the call for evidence in relation to the financial implications of the Pentland Hills Regional Park Boundary Bill. Responses to the questions asked are set out below.

Q1 Did you take part in any consultation exercise preceding the Bill and if so, did you comment on the financial assumptions made?

2. In its capacity as the lead authority for the existing Pentland Hills Regional Park (PHRP), the City of Edinburgh Council administers both the PHRP Joint Committee and the PHRP Consultative Forum. During the lead up to the introduction of the Bill, Christine Graham MSP addressed both the Joint Committee and the Consultative Forum on several occasions. CEC participated in the discussions arising along with other existing local authority partners and stakeholders.
3. CEC submitted a written response to the 12 week consultation on the draft proposal held between the 26th February and 23rd May 2014.
4. CEC was represented at a meeting hosted by Christine Grahame MSP on 12th December 2014 to further engage with stakeholders about matters relating to funding and governance.
5. In responding to the financial implications of the proposed Bill, CEC commented in response to the 12 week consultation exercise. These comments can be summarised as:
 - Expansion will bring demand for capital investment in paths and related visitor facilities.
 - There will be a requirement for revenue funding to service and maintain the park.
 - There may be sources of funding for capital works but it is unclear where revenue funding might come from if not from local authorities.
 - There is intense pressure on CEC's revenue budgets and this is likely to intensify further.
 - It is not clear from the proposal how CEC might be asked to contribute to services in an expanded Regional Park.

- CEC would give due consideration to any funding request in the context outlined above.
- A feasibility study should be carried out and be funded by Scottish Natural Heritage or the Scottish Government to explore the main issues further.

Q2 If applicable, do you believe your comments on the financial assumptions have been accurately reflected in the FM?

6. Without further detailed feasibility study and proposed operating model, it is difficult to assess with confidence the additional capital and revenue costs that might arise. While there may be a 'do nothing' option whereby the boundary would be extended without the provision of additional services, visitors and land managers are likely to have a reasonable expectation that Regional Park designation is supported with additional services. Based on the approach taken within the existing Regional Park, as a minimum these services are likely to include:
 - Provision, management and maintenance of access points (including car parks and visitor centres where appropriate).
 - Way marking, signage and interpretation.
 - Maintenance and improvements to paths.
 - Staff input for advising visitors, liaising with land managers and delivering projects.
7. It is recognised that to some extent, elements of these services are already being provided by local authorities in the area covered by the proposed extension. However, it is not clear at this stage how these might integrate with an overall co-ordinated approach to the management of a larger Regional Park. While the Financial Memorandum (FM) does set out some indicative initial and ongoing costs, in the absence of a detailed proposed operating model which sets out the intended level of service, these may only be regarded as speculative and the position remains that it is difficult for CEC to assess the likely financial impact of the proposal.
8. It is welcomed that the FM acknowledges the financial pressures on local authorities at this time.
9. As set out in the earlier consultation response, CEC would consider requests for funding within the context of overall funding pressures, but would need to do so on the basis of initial feasibility work setting out a proposed operating and funding model linked to a proposed level of service for an expanded Regional Park. It is considered therefore that the FM does not fully reflect CEC's earlier comments in relation to the requirement for such work.

Q3 Did you have sufficient time to contribute to the consultation exercise

10. Yes

Q4 If the Bill has any financial implications for your organisation, do you believe that they have been accurately reflected in the FM ?

11. With reference to paragraphs 6-9 above, in the absence of a detailed funding and operating proposal for a larger Regional Park, it is difficult for CEC to accurately assess the financial implications at this stage.

Q5 Do you consider that the estimated costs and savings set out in the FM are reasonable and accurate?

One-Off Costs

12. The estimated one off cost of £20,000 in relation to preparation of an alternative boundary appears to be a reasonable estimate. However CEC as the lead authority for the existing Regional Park would be unable to undertake or fund this work alone. Should it be considered necessary to define an alternative boundary, the management and funding of such an exercise would need to be agreed between local authority partners.
13. The estimated one-off costs of updating and providing information and promotional material are considered to be lower than might be anticipated in practice. The following would need to be redesigned and replaced: website content as required; car park and access point information boards and interpretative panels; the visitor guide; and leaflets for walking, cycling, horse riding and access by public transport. A realistic estimated cost for redesign and replacement of existing materials is circa £15,000. In addition to this would be costs associated with providing additional materials to cover the extended area of the Regional Park. This is difficult to assess in advance of further detailed planning of the likely requirements.
14. In advance of further detailed planning and assessment it is not possible at this stage to estimate accurately the likely costs of additional parking provision. The number of access points, their current usage and any known issues (such as inconsiderate parking at more popular access points) would need to be assessed across the extended area as a whole. The scope for improving access points will depend on a range of factors including land ownership, physical layout and likely demand. It is not considered that as set out in the FM, one small additional car park would be a reasonable assessment of the likely requirement at this time. Again further detailed work would be needed to provide a reasonably accurate assessment.

Overall running costs

15. The additional staff resource required to operate an expanded Regional Park would depend largely on the funding, governance and operational arrangements agreed between the five local authority partners. It is the case however that the existing staff resource available to manage the exiting Regional Park could not cover a larger area without an unacceptable reduction in service within the existing area. Additional staff resource would need to be provided. The number and roles of these staff, and the structure within which they operate would need further detailed planning and negotiation between local authority partners and as such are difficult to estimate at this stage.
16. Managing the paths and access infrastructure is a key role for a Regional Park and it is a reasonable expectation that there would an incremental improvement in the quality and maintenance of paths across an expanded park as a whole. Revenue budgets for path maintenance are limited and like all local authority budgets are under pressure and this is likely to continue. New ways of delivering path improvements may have to be found. CEC, along with existing local authority partners is assessing the scope to work with existing local and specialist trusts to deliver new investment in the paths system within the existing PHRP. Such work may involve elements of volunteering and training in support of ongoing path maintenance. If successful, this approach might be rolled out to cover the wider Pentland Hills range.

Q6 If applicable, are you content that your organisation can meet any financial costs that it might incur as a result of the Bill? If not, how do you think these costs should be met?

17. At this time, CEC is unable to commit additional budget to meet one-off or additional ongoing costs arising from the Bill. CEC would however engage positively in future discussions about funding, governance and operational arrangements for an expanded Regional Park and consider requests for funding within the prevailing budgetary context. CEC is not content at this stage however that it could necessarily meet the financial costs arising from the Bill. Further detailed feasibility work including negotiation of acceptable funding and governance models would assist with assessing the likely costs and whether these are likely to be met.
18. CEC is of the view that additional funding is required from the Scottish Government for both a detailed feasibility study and for the ongoing operational management of an extended Regional Park. Without such funding being in place, CEC would be unable to support the Bill.

Q7 Does the FM accurately reflect the margins of uncertainty associated with the Bill's estimated costs and with the timescales over which they would be expected to arise.

19. The likely costs depend largely on the aims, objectives and aspirations of an extended Regional Park. They depend also on the governance and operating model adopted. It is considered that in the absence of detailed feasibility and preparatory work in advance, that there remains significant uncertainty about the estimated costs and associated timescales.

Q8 Do you believe that the FM reasonably captures any costs associated with the Bill? If not, what other costs might be incurred and by whom?

20. The FM does not fully account for the senior officer input and associated administrative tasks that will be required to discuss, negotiate and ultimately agree a new funding, governance and operational regime for an expanded Regional Park. This could be significant. CEC as the lead authority for the existing Regional Park will not be a position to meet these costs alone.

Q9 Do you believe that there may be future costs associated with the Bill, for example through subordinate legislation? If so, is it possible to quantify these costs?

21. The future costs are to some extent discretionary in the sense that there will be no duty of local authorities to provide additional services with an extended boundary. However it is reasonable to expect that an extended park boundary will be supported by additional service. The extent of these additional costs cannot be accurately assessed in advance of further detailed preliminary work.

End

Appendix 3:

Consultation Response to 'A proposal for a Bill to extend the boundary of the Pentland Hills Regional Park' (Ratified by Committee on 3rd June 2014).

	Proposed CEC response
<p>1. Do you support the aim of the proposed Bill to extend the boundary to include the entire Pentland Hills range?</p> <p>Please indicate “yes/no/undecided” and explain the reasons for your response.</p>	<p>Yes, in principle, and conditionally. CEC recognises the importance of the Pentland Hills as part of the capital skyline and as an ingredient in the essential landscape character and setting for Edinburgh, as a recreational opportunity for its citizens to engage in healthy outdoor pursuits, and as a reservoir of biodiversity. The Regional Park has successfully promoted these valuable qualities whilst mediating between the primary land-uses of the hills – farming, water catchments and military training – and other uses.</p> <p>As lead authority for the Regional Park, CEC has an interest in the management of the Pentland Hills beyond its authority boundary, because it is agreed by all the partners involved that a holistic approach to management of the park is beneficial. Whilst currently this interest does not extend to the parts of West Lothian, South Lanarkshire and Borders that are indicated in the proposed expansion plans, CEC recognises that expansion of the Regional Park to cover the whole Pentland Hills range would be consistent with the current aims of the park, and could potentially provide opportunities for Edinburgh people to have access to a wider area for recreation.</p> <p>However it must be recognised at the outset that CEC is under severe budgetary pressure, and whilst expansion of the Regional Park might be a desirable medium to long-term ambition, in the short term any request for additional funding would require to be considered in the</p>

	<p>context of the Council's service priorities, and it is unlikely that substantial additional funding could be made available in the immediate future.</p>
<p>2. Where should the southernmost boundary be located? Please explain the reasons for your response.</p>	<p>CEC does not have a strong view. CEC's view is that this should be determined in partnership with South Lanarkshire Council and Scottish Borders Council and their local stakeholders.</p>
<p>3. Should the western boundary be expanded to include the area around Balerno? Please explain the reasons for your answer.</p>	<p>In considering extension to the Currie-Balerno ridge, there are a number of issues to consider from both the operational point of view and that of planning policy. It is currently proposed in Edinburgh's Local Development Plan that the Special Landscape Area designation be extended to cover the lower slopes of the Pentland Hills, currently outside the Regional Park boundary, which would give this land further protection. From the recreational point of view, bringing the Water of Leith valley into the Regional Park might provide gains in terms of accessibility, both for local communities and for the wider Edinburgh population using the Water of Leith corridor as a green transport route in and out of the city. However, it is possible for these gains to be made without Regional Park designation, were resources to become available. Similarly, enhanced protection for the landscape can be achieved via planning policy, irrespective of whether it has been included within the Regional Park or not.</p> <p>It seems unlikely that incorporation of a major settlement into the Regional Park, such as Balerno, would be either feasible or desirable, and it is likely that some landowners may wish to resist extension over their greenfield land. The statutory framework for the Regional Park</p>

	<p>was not created with the substantial settlements in mind, and it is not obvious at this stage what the benefits of including Balerno within the boundary would be.</p>
<p>4. Do you agree that legislation is a necessary and appropriate means of addressing the issues identified?</p>	<p>The Bill would be a proper and appropriate way to examine the issues surrounding the expansion proposal and their implications.</p>
<p>5. What (if any) would be the main practical advantages of the legislation proposed? What (if any) would be the disadvantages?</p>	<p>The advantages from CEC's point of view are that a bill would provide the statutory process which is required for the proposal to be implemented, and once enacted this would give the respective Councils a clear basis on which to proceed.</p>
<p>6. What is your assessment of the likely financial/resource implications (if any) of the proposed Bill to you or your organization? What (if any) other significant financial implications are likely to arise?</p>	<p>Expansion of the Regional Park into the southern part of the range will necessarily bring with it demand for capital investment in car parking, signage, path surfacing and perhaps other visitor facilities. There will also be a requirement for revenue funding in order to allow the park to be serviced and maintained.</p> <p>Whilst it is possible to imagine that a variety of funding sources could be engaged in order to achieve capital works on the ground, it is unclear where revenue funding might come from, other than from the local authorities. CEC can only speak for itself, but the pressure on the Council's revenue budgets is intense and likely to intensify further. It is not clear from the proposal how CEC might be asked to contribute to services in an expanded Regional Park, but any funding request would be given due consideration in the context outlined above.</p>
<p>7. Is the proposed Bill likely to have any substantial positive or negative implications for equality? If it is likely to have a substantial negative implication,</p>	<p>CEC does not currently foresee any significant equalities impact insofar as the proposal is</p>

how might this be minimised or avoided?	described.
8. Do you have any other comments on or suggestions relevant to the proposal?	<p>Whilst noting that expansion of the Regional Park within its own authority area is unlikely to be an early priority, CEC looks forward to further dialogue on the expansion proposals in due course. In order to advance the proposal beyond the concept stage a feasibility study needs to be carried out to explore the main issues further. CEC would currently be unable to fund this study, and notes that the Regional Park Joint Committee has already called for such a study to be funded by Scottish Natural Heritage or the Scottish Government.</p>