

Mavisbank Policies Landscape Management Plan

Issues and Options Paper

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately. Return to hannah.garrow@scotland.gsi.gov.uk

1. Name/Organisation

Organisation Name

Midlothian Council

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Kinch

Forename

James

2. Postal Address

Corporate Services

Midlothian Council

62a Polton Street

Bonnyrigg

Postcode EH15 IJP

Phone 0131.561.5256

Email

james.kinch@midlothian.gov.uk

3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

It provides good information on how the path system could be developed in accordance with the designed landscape.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

No comment

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

The plan could identify key issues that can be addressed in the short, medium and long term. Issues such as access into the site could engage the Midlothian Access Forum and local community councils.

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

No comment

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

The plan can prioritise areas of high public amenity and areas where this would need to be lower. Access routes would be designed/constructed/restricted accordingly

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

The management plan should prioritise walking and cycling into the site with appropriate signage as a quick win and which links into the Midlothian path network - much of which is currently being signed. Within the site and with immediate effect a small amount of signage should be erected to direct the public along preferred routes. In the longer- term an interpretive plan including appropriate signage and promotion will require to be drawn up that links to marketing plan.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

As above

Question 8: Can you identify any additional funding opportunities for the site?

WREN for signage and improved access

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

No comment

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

No comment

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

No comment

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

No comment

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

No comment

Question 14: Which scenario do you consider represents your preferred

one and why?

No comment

Question 15: Are there any other scenarios which we should consider and what are they?

No comment

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1. Name/Organisation

Organisation Name

Edinburgh Natural History Society

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Crowther

Forename

Neville

2. Postal Address

14, Belwood Rd, Milton Bridge

Penicuik

Midlothian

Postcode EH260QN

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Email
nevillecrowther@aol.com

3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

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Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

The plan should be drawn up by a management committee who should have strong expert representation from local and national (Scottish) nature-conservation bodies, not just SNH.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

The policies have developed into a unique and diverse mosaic of natural and semi natural habitats, with a wide range of plant and animal communities. It would be best if the main area were to be managed as a nature reserve and any eventual reconstruction of the historic designed landscape be limited to the area around the house itself. This might best be achieved if HS were to transfer responsibility for the main part of the policies to a nature conservation body, either governmental or in the voluntary sector.

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

See Q1 and Q2 above

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Water management should be carried out only in so far as needed for the benefit of the site's natural environment.

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

Nature conservation bodies have considerable experience in determining the extent to which access and human pressure can be sustained in natural habitats like these, and so their involvement is important for this purpose

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

For this purpose, better access to the house can be provided by upgrading the path from Kevock Road or more simply by creating a short path from the riverside and alongside the walled garden.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

The site is quite small, the terrain largely steep and boggy, and the habitats will not support too much human pressure. It is therefore not appropriate to promote the site as you might a country park. Interpretation should be confined to the area of the house

Question 8: Can you identify any additional funding opportunities for the site?

No

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

The site is a designated Local Biodiversity Site. Designation as a Local Nature Reserve might provide better protection by means of appropriate management.

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

See Q6 above

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Yes

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

The important issue for ENHS is that nothing should be done to the detriment of the natural environmental features of the site. We are not convinced that the study has gleaned an adequate view of these and recommend a thoroughgoing environmental survey and audit before any decision is taken on these scenarios.

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

No

Question 14: Which scenario do you consider represents your preferred one and why?

Scenario 1 would be the least potentially damaging.

Question 15: Are there any other scenarios which we should consider and what are they?

See our response to previous Questions 1 and 3.

Hannah Garrow,
Historic Scotland,
Room E7,
Longmore House,
Salisbury Place,
Edinburgh,
EH9 1SH

Esk Valley Trust,
c/o Tom Stevenson,
Rackwick,
Roslin Glen,
Midlothian,
EH25 9PX

2nd November, 2010

Dear Ms Garrow,

Mavisbank Policies Landscape Management Plan: Issues and Options Paper

I am pleased to respond to your paper on behalf of the Esk Valley Trust. The ambition of the Trust is to draw attention to the cultural and environmental splendours of the Esk valley and to make them more accessible. A particular goal is to create the Esk Valley Way so that locals and visitors can walk along stretches or the whole of the valley from source to mouth, stopping off to visit gems of specific historical or environmental interest. The policies of Mavisbank are such a gem. We warmly support your plans to improve management and access.

There are a number of points we would make from the point of view of the Esk Valley Trust:

1. We are delighted with your intention to involve the local community in the plans. The Esk Valley Trust and its associate member, the Lasswade and District Civic Society (LDCS), can contribute on such matters as site interpretation and access.
2. We agree with the Environmental Report and with LCDS that we prefer scenarios 1 & 2. With regard to Scenario 3 it seems unwise to remove 19th Century modifications to the landscape in an attempt to recreate the 18th Century landscape, especially when there is uncertainty about its form.
3. We support the actions outlined in your report that are common to both scenarios 1 & 2, namely: opening up the front lawn to link the house with the policies, clearing vistas obstructed by the coniferous patch, replacing former vista trees, surveying and stabilising built structures, clearing rhododendrons, improving the drainage, managing the trees and grazing land, controlling invasive species, managing and strengthening the path network, introducing discrete signage for site interpretation, involving local groups in small-scale management, and carrying out an ecological survey.
4. However, we wonder whether more emphasis could be placed on improving drainage adjacent to the riverside path which is a key Midlothian core path and an essential link in the Esk Valley Way? We know from the geomorphology that the waterlogging on the path has developed in the last 20 years primarily as a result of slumping in the policies. In 1990 it was possible to walk along an intact East Drive in dry shoes before slumping occurred!

5. The idea of increasing access to the policies from the riverside path near Kevock steps and near the walled garden is excellent. The map in Fig. 5 has done more to raise local morale than any other proposal in decades! At present access to the policies from the south gate is disputed and the uncertainty deters people from visiting the policies and creates local tensions. Introducing these access points creates a circular walk. The advantage would be that both access paths would be within the ownership of Historic Scotland and could be signposted to encourage walkers.

6. Finally, in response to your general query, we have very modest funds which we could use to help in specific small-scale initiatives of benefit to the cultural and environmental quality of the Esk Valley.

With best wishes,

Professor Tom Stevenson,

(Chairman, Esk Valley Trust)

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1. Name/Organisation

Organisation Name

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Forename

2. Postal Address

Rackwick			
Roslin Glen			
Roslin			
Midlothian			
Postcode 9PX	EH25	Phone	Email stevenson.roslin@talk21.com

3. Permissions - I am responding as...

Individual	/	Group/Organisation
<input type="checkbox"/>		<input checked="" type="checkbox"/>
<i>Please tick as appropriate</i>		

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

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Please tick as appropriate

Yes

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

Comments

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

Comments

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Comments

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Comments

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

Comments

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Comments

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

Comments

Question 8: Can you identify any additional funding opportunities for the site?

Comments

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

Comments

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

Comments

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Comments

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

Comments

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

Comments

Question 14: Which scenario do you consider represents your preferred one and why?

Comments

Question 15: Are there any other scenarios which we should consider and what are they?

Comments

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1. Name/Organisation

Organisation Name

Friends of Mavisbank

Title Mr Ms Mrs Miss Dr Please tick as appropriate

Surname

Tuke

Forename

Tim

2. Postal Address

15 Stevenson Place

Lasswade

Midlothian

Postcode EH18 1JZ

Phone 0131 654 0827

Email ttuke@springtec.co.uk

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

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Please tick as appropriate Yes No

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Yes, make my response and name available, but not my address

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Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d)

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Involvement of bodies such as SNH, SWT, RSPB, Local civic society.

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Some of the erosion caused by horses on the high drive should be repaired and the drive properly drained. Other water features, particularly the pond/moat and the wetlands towards the eastern end of the site should not be disturbed.

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

The balance should be towards the latter. Pedestrian access should be improved but the site should be very much a place in which to wander without excessive guidance in the form of defined paths or signage. The site should be more akin to a nature reserve. Visitor numbers should not be a measure of success and there should not be considered anything wrong with a fair amount of mud.

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

There should be in the order of four pedestrian access points from the river path, the Kevock entrance and possibly from a car park off the Loanhead-Lasswade road.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

The site should not be overly promoted.; Nature lovers and those seeking a place of peace and tranquility will find their own way there.

Question 8: Can you identify any additional funding opportunities for the site?

No comment

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

Management of horse or other grazing. Proper pedestrian access (eg: kissing gates/styles)

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

No comment

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Generally – yes.

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

Yes

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

They are rather long but otherwise OK

Question 14: Which scenario do you consider represents your preferred one and why?

Scenario 1. Reasons should be apparent from above answers.

Question 15: Are there any other scenarios which we should consider and what are they?

A lighter touch even than that proposed in Scenario 1.

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Organisation Name

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

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2. Postal Address

3. Permissions - I am responding as...

Individual <input checked="" type="checkbox"/>	/	Group/Organisation <input type="checkbox"/>
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Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

By seeking advice from other organisations, local groups and individuals with detailed knowledge of the site.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

The former Mavisbank designed landscape has deteriorated since being in public ownership. The balance between what remains of the historic landscape and the natural environment is best served by the “as found/minimum” option, as presented in Scenario 1.

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

No comment.

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Proper drainage within the site is required to help protect sensitive areas, and prevent surface water reaching the adjacent river-path to allow practical public access from this route.

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site’s attributes in the promotion of access and recreation across the site?

The site should not be promoted heavily for tourism. A low-key approach to public access should be adopted, using existing and proposed footpaths, to preserve the existing environment. There are many other country parks in the area that cater for recreation.

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Public access currently exists from Kevock Road, but could be improved. Practical public access could also be provided by way of the river path along the North Esk, linking with the proposed footpath around the Eastern perimeter of the former walled garden, as shown in Figure 5.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

To preserve the “as found” environment, promotion and interpretation of the site should be kept to a minimum.

Question 8: Can you identify any additional funding opportunities for the site?

Money may be available from local organizations that seek to promote a network of paths in the area.

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

Grazing needs to be better managed with fencing, and by keeping walkers and dogs away from sensitive areas.

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

By providing better paths to view the house as proposed in Figure 5. However, in order to maintain public safety around the House, now a ruin and not in Historic Scotland’s ownership, management of the this area will need to be carefully considered.

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Yes

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

The proposals appear to cover the key issues.

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

No

Question 14: Which scenario do you consider represents your preferred one and why?

Scenario 1 best preserves what little is left of the old designed landscape with protection and promotion of the natural environment.

Question 15: Are there any other scenarios which we should consider and what are they?

No.

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1. Name/Organisation

Organisation Name

Lasswade and District Civic Society

Title Mr x Ms Mrs Miss Dr *Please tick as appropriate*

Surname

sugden

Forename

david

2. Postal Address

Kevockbank House		
Lasswade		
Midlothian		
Postcode EH18 1HX	Phone 01316637605	Email david.sugden@ed.ac.uk

3. Permissions - I am responding as...

Individual	/	Group/Organisation
<input type="checkbox"/>		<input checked="" type="checkbox"/>
<i>Please tick as appropriate</i>		

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Please tick as appropriate

Yes

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

I could not get the boxes to tick. We are happy for this to be public and exchanged within the Scottish Office.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

Comments

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Comments

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Comments

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

Comments

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Comments

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

Comments

Question 8: Can you identify any additional funding opportunities for the site?

Comments

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

Comments

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

Comments

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Comments

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

Comments

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

Comments

Question 14: Which scenario do you consider represents your preferred one and why?

Comments

Question 15: Are there any other scenarios which we should consider and what are they?

Comments

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<input type="text"/>		
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Group/Organisation



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Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

Comments

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

Tricky, because much of the natural history value of the site is a consequence of neglect and/or lack of development.
Answering questions 2, 4 and 5 together. Balance can be achieved by applying different levels of management to different parts of the site. The area closest to (and most visible from) the house should be more comprehensively restored. This would include the avenues of trees, the lochan (surely an inappropriate word for the lowlands!), and the relatively open spaces between them. These areas would have the highest density of visitors, and therefore would need more, and more substantial, paths. More remote areas would have little or no intrusive management, and little or no formal public access. (And I am not saying that just because I happen to live by the most remote part of the site!)

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Local residents organisations (e.g. Lasswade Civic Society) provide practical help in maintaining local sites, including the footpath along the River Esk. Local residents could also lend their time/expertise. (I would gladly help.)

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

See question 2.
Some parts of the land should remain undrained. The benefit to wildlife of this rare habitat is enormous.
Note that the rise in ground water levels may increase the flow of water in some areas, but this is a sloping site, and the ground water cannot rise permanently above the lowest level.
The plan seems to indicate concerns about hypothetical problems of pollution from mines, grazing and unspecified chemicals. Unless specific issues are identified, which would cause pollution of the river that would not occur anyway from other regions of the catchment area, such concerns should not lead to expensive or otherwise unnecessary management.

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

See question 2.

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Access to the site is an important issue. Reopening the North drive would be politically difficult, and it is doubtful whether the drive is suitable for the potential traffic. The entrance from / exit to the A768 in Loanhead is not satisfactory. There is also the issue of where there could be car parking, without it destroying some of the qualities of the site.

I strongly recommend that consideration be given to making the proposed temporary entrance from the A768 permanent. Most or all of the car parking could then be in the present field adjacent to the road. The integrity of the site would be maintained, and a much safer access to the main road would be provided.

There should of course be foot access at other point, linking with the footpaths that are nearby. However, care would have to be taken to ensure that road traffic and parking in Polton Village and Kevock Road were not increased.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

On-site interpretation boards should be unobtrusive. People should be encouraged to discover, not simply be informed. Web-based information that people/groups would access in advance would be valuable.

Promotion of the site raises the issue of visitor numbers. Access, parking, number and scale of internal footpaths etc. all depend on the numbers. I see no attempt to quantify visitor numbers. This surely is important both for planning of the development, and in evaluating cost:benefit.

Question 8: Can you identify any additional funding opportunities for the site?

Comments

Question 9: What additional measures do you think would be useful to

ensure and enhance the protection of the site?

Comments

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

Ensure that the landscape closest to the house has the highest level of treatment and subsequent maintenance.

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

See the comment about visitor numbers in question 7.

Maintenance of the 'open' spaces is an important issue. In recent years grazing has taken care of this, at least in the area towards the house, and it is probably that this is how it was originally. However, there are issues of people/animal interactions. Should large areas be fenced, and therefore inaccessible, or will there be a need for expensive maintenance?

Grazing by sheep, which is suggested, leads to very short grass, and elimination of many wild flowers. Would cattle be more appropriate? There are also some wild roe deer, which should be encouraged, so fencing is an issue that should be considered.

Maintenance costs in general do not seem to be been addressed.

On invasive species, no mention has been made of Himalayan balsam, *Impatiens glandulifera*. This has increased enormously along the River Esk in recent years, and is now spreading rapidly onto the Mavisbank estate. As it spreads by seed, it is potentially a much worse problem in the short term than Japanese knotweed, *Fallopia japonica*. To my knowledge, giant hogweed, *Heracleum mantegazzianum*, is not present, and is relatively easily eradicated.

There is also reference to spread of *Rhododendron*. The plants close to the house are old hybrids, and I have seen little or no evidence of them spreading by seed. That could be checked, but controlling them is unlikely to be a problem in this area.

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

The assessment is long and complicated!

I can confirm that badgers are present on the site, but not whether they are specifically on 'the mound'.

Bats are, of course, present – several species.
One can never absolutely prove a negative, but I believe that great crested newts are absent. Common newts are abundant.

I note that disturbed ground in the mound area is to be sown with ‘wildflower’ mix. That is far too unspecific, and could well introduce species that are not appropriate in the area.

It is stated that ‘earthworks and pipe/culvert works to improve drainage across other areas of the site, including along the East Drive, and across the valley fields’ will be done. See my answer to question 4: draining ‘across the valley fields’ is unnecessary, and damaging to both plant and animal life.

There are references to ‘clearance of scrub’ and planting of hawthorn. I suspect that most of the ‘scrub’ is hawthorn! The reset will largely be bramble – a native of high value to wildlife.

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

Consents are needed for *all* tree work within the Mavisbank Conservation Area.

Question 14: Which scenario do you consider represents your preferred one and why?

Scenario 3 is far too intrusive, and is based on research findings that may well not be accurate. It could destroy what it sets out to protect.
Scenarios 1 and 2 both have their attractions. I prefer 1, as it involves less disturbance of the site, and it would be cheaper, so be more likely to be implemented.

Question 15: Are there any other scenarios which we should consider and what are they?

A combination of 1 and 2, with more action in the most important areas (close to and in front of the house), and less intervention in the more remote areas.

Mavisbank Policies Landscape Management Plan

Issues and Options Paper

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately. Return to hannah.garrow@scotland.gsi.gov.uk

1. Name/Organisation

Organisation Name

(Simpson & Brown on behalf of) The Mavisbank Trust

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Lewis

Forename

Chris

2. Postal Address

Trust Secretary c/o Edinburgh & Lothian Greenspace Trust

109/11 Swanston Road

Edinburgh

Postcode EH10 7DS

Phone 0131 445 4025

Email chris@ELGT.org.uk

3. Permissions - I am responding as...

Individual

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate Yes No

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

(c) The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

Please refer to comments on separate sheet attached

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

Comments

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Comments

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Comments

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

Comments

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Comments

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

Comments

Question 8: Can you identify any additional funding opportunities for the site?

Comments

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

Comments

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

Comments

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Comments

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

Comments

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

Comments

Question 14: Which scenario do you consider represents your preferred one and why?

Comments

Question 15: Are there any other scenarios which we should consider and what are they?

Comments

Mavisbank Policies Landscape Management Plan

Issues and Options Paper

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately. Return to hannah.garrow@scotland.gsi.gov.uk

1. Name/Organisation

Organisation Name

Midlothian Access Forum

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Pope

Forename

John

2. Postal Address

The Monklands

Seafield Road

Bilston

Postcode EH25 9RP

Phone 0131.440.2399

Email:

idkpope@vahoo.co.uk

3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

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Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

The access plan appears to be sufficient albeit detailed drawings will require to be drawn and consulted upon and which the forum would expect to be consulted.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

No need for the Midlothian Access Forum to comment on this issue

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

The Midlothian Access Forum would expect to be a stakeholder in all future access plans

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

No need for the Midlothian Access Forum to comment on this issue

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

A well designed path network that respects the designed landscape in order that the impacts of the environment including natural, landscape and cultural heritage are taken into account.

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Please refer to my attached letter.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

Please refer to my attached letter.

Question 8: Can you identify any additional funding opportunities for the site?

WREN/Forestry Commission/Lottery fund.

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

Please refer to my attached letter

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

Until the house is developed the landscape should accord with one of the original designs but interpretation could help create the link e.g. an illustrated notice-board

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

We would like to see a timetable showing the improved promotion and provision for public access at an early stage.

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

No need for the Midlothian Access Forum to comment on this issue

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

No need for the Midlothian Access Forum to comment on this issue

Question 14: Which scenario do you consider represents your preferred one and why?

Option 2 is the preferred option in the long term but the issue of public access i.e promotion and provision requires immediate attention.

Question 15: Are there any other scenarios which we should consider and what are they?

No need for the Midlothian Access Forum to comment on this issue

Mavisbank Policies Landscape Management Plan

Issues and Options Paper

RESPONDENT INFORMATION FORM

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1. Name/Organisation

Organisation Name

Mark Turnbull Landscape Architect (MTLA)

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Turnbull

Forename

Mark

2. Postal Address

Mark Turnbull

MTLA

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Email mark@mtla.co.uk

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Individual

Group/Organisation

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(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate Yes No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

Please refer to comments on separate sheet attached

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

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Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Please refer to comments on separate sheet attached

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Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

Please refer to comments on separate sheet attached

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

Please refer to comments on separate sheet attached

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

Please refer to comments on separate sheet attached

Question 14: Which scenario do you consider represents your preferred one and why?

Please refer to comments on separate sheet attached

Question 15: Are there any other scenarios which we should consider and what are they?

Please refer to comments on separate sheet attached

Our Ref: PCS /110166/SCW
SG Ref: SEA00518/er

Hannah Garrow
Senior Development Assessment (SEA) Officer
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

4th November 2010

By email: sea.gateway@scotland.gsi.gov.uk

Dear Hannah

Environmental Assessment (Scotland) Act 2005
Mavisbank House Policies Landscape Management Plan – Environmental Report

Thank you for your Environmental Report consultation submitted under the above Act in respect of the Mavisbank house policies landscape management plan. This was received by SEPA via the Scottish Government SEA Gateway on 22nd September 2010.

We have used our scoping consultation response of 18th August 2010 to consider the adequacy of the Environmental Report. Please note, this response is in regard only to the adequacy and accuracy of the Environmental Report and any comments we may have on the Mavisbank house policies landscape management plan itself will be provided separately.

In general we are satisfied with the content of the Environmental Report and we agree with the assessment findings. As anticipated in our screening consultation response, the assessment identified no significant adverse environmental effects for what concerns SEPA's main areas of interest.

We are content with the way climate change adaptation has been considered in the assessment and therefore we have no further comments to add.

As the Mavisbank house policies landscape management plan is finalised, Historic Scotland as Responsible Authority, will require to take account of the findings of the Environmental Report and of views expressed upon it during this consultation period. As soon as reasonably practical after the adoption of the plan, the Responsible Authority should publish a statement setting out how this has occurred. We normally expect this to be in the form of an "SEA Statement" similar to that advocated in the Scottish Government SEA templates and toolkit which is available at www.scotland.gov.uk/Publications/2006/09/13104943/13. A copy of the SEA statement should be sent to the Consultation Authorities via the Scottish Government SEA Gateway on publication.

If you wish to discuss anything in this response please do not hesitate to contact me on 01786 452430 via our SEA Gateway at sea.gateway@sepa.org.uk.

Yours sincerely

Silvia Cagnoni Watt
Senior Policy Officer

Chairman
David Sigsworth

Chief Executive
Dr Campbell Gemmell

SEPA Corporate Office
Erskine Court, Castle Business Park, Stirling
FK9 4TR
tel 01786 457700 fax 01786 446885
www.sepa.org.uk



Scottish Natural Heritage

All of nature for all of Scotland

Hannah Garrow
Senior Development Assessment Officer
Historic Scotland, Room E7
Longmore House
Salisbury Place
Edinburgh
EH9 1SH

27 October 2010
Our ref: CNS/SEA/00518

Dear Ms Garrow

**Environmental Assessment (Scotland) Act 2005
Mavisbank House Policies Landscape Management Plan**

Thank you for the Environmental Report (ER), submitted to the Scottish Government SEA Gateway on 22 September 2010. Our comments below are provided in accordance with the Consultation Authorities Information Note for Responsible Authorities.

Subject to the specific comments set out in the annex to this letter, SNH considers that the ER provides an accurate assessment of the potential significant effects of the Plan. In our response to the screening and scoping reports we made specific comments on the scope and level of detail required in the ER. We are pleased that these comments have substantially been incorporated.

We hope that these points are of value to you. Please note that this response is in the context of the Environmental Assessment (Scotland) Act 2005 and our role as a Consultation Authority.

Should you wish to discuss this response, please do not hesitate to contact me on 0131 316 2633 or by e-mail at janice.winning@snh.gov.uk, or via SNH's SEA Gateway at sea.gateway@snh.gov.uk.

Yours sincerely

Janice Winning
Operations Manager
Forth & Borders

cc James Kinch, Corporate Services, Midlothian Council, 62a Polton Street, Bonnyrigg, Midlothian EH15 1JP



INVESTOR IN PEOPLE

Scottish Natural Heritage, Lothians Area Office, Silvan House, 3rd Floor East, 231 Corstorphine Road, Edinburgh, EH12 7AT
Tel 0131 316 2600 Fax 0131 316 2690 email: janice.winning@snh.gov.uk www.snh.gov.uk

Annex 1

Scottish Natural Heritage (SNH) would like to make the following additional comments on the Environmental Report (ER).

We note that the ER has incorporated many of our comments from the screening and scoping stages, and we are satisfied that the ER has accurately assessed the potential impacts of the plan upon SNH's main areas of interest.

Context

We support the environmental objectives outlined in 2.3 especially;

- *To promote and encourage opportunities for people of all abilities to enjoy access to wildlife and the countryside*
- *To protect and enhance species and habitats*
- *To halt the loss of biodiversity and continue to reverse previous losses through targeted action for species and habitats*
- *To safeguard landscapes*
- *To increase awareness, understanding and enjoyment of the natural and historic environment*
- *To manage access appropriately to avoid damage to archaeological sites or habitats, and disturbance to wildlife, especially breeding birds, by heavy public use of sensitive areas*
- *To be positioned to respond to the predicted effects of climate change*

Promoting the enjoyment of Mavisbank Grounds

Mavisbank is a very valuable amenity asset giving a quality natural heritage experience within easy reach of several settlements without the use of a car. At present this is an underused resource perhaps due to the public being uncertain if they can use the grounds. With regard to enhancing and managing access we support the reference given to linking up with the Core Path network (key issues pg113) There are extant paths within the site and the site sits within a local and core path network including the River Esk paths. We recommend better links (including signage) could be made easily with the local and core path network including the River Esk paths as well as with other amenity areas within The Esk Valley eg Springfield Mill and Roslin to give a longer walk with visitor attractions. Midlothian Council have dedicated access staff that can advice on the integration of this site with the local network.

Landscape & Habitats

We believe the key issues in relation to landscape, biodiversity as well as the attention given to key habitats and species have been correctly identified in pgs 100- 110. Whichever restoration scenario is chosen - we aim to continue to work closely with Historic Scotland during implementation so we can achieve a balanced and phased approach towards restoration and maintain the natural heritage features of interest at Mavisbank House.

Scenarios 1 + 2

We agree that Scenario 1 (as found), and Scenario 2 (low level restoration) are likely to have overall positive impacts upon SNH's main areas of interest, namely access and biodiversity, flora and fauna. Specifically:

- the plan represents a valuable opportunity to improve access to the site, an outcome which would benefit local residents and visitors;
- the plan provides for enhancement of the ancient woodlands;
- the plan aims to tackle invasive non-native species.

Scenario 3

We agree that Scenario 3 (formal landscape restoration) carries the risk of significant negative impacts upon biodiversity, flora and fauna. Specifically and of most concern is the potential negative impact of landscape restoration upon ancient woodland and veteran trees. Potential negative impacts upon notable plant species in the canal and by the River North Esk should also be carefully considered.

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately. Return to hannah.garrow@scotland.gsi.gov.uk

1. Name/Organisation

Organisation Name

Scottish Wildlife Trust Lothians Members Centre (response dated 19-11-2010 with permission from HS for late submission)

Title Mr *Please tick as appropriate*

Surname

[Redacted]		
[Redacted]		
[Redacted]		
[Redacted]		
[Redacted]		
[Redacted]		
[Redacted]		
[Redacted]		
[Redacted]	[Redacted]	[Redacted]

3. Permissions - I am responding as...

Individual	/	Group/Organisation
<input type="checkbox"/>		<input type="checkbox"/>
<i>Please tick as appropriate</i>		

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?
Please tick as appropriate Yes

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Please tick ONE of the following boxes

Yes, make my response, name and address all available

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Are you content for your **response** to be made available?
Please tick as appropriate
 Yes

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We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?
Please tick as appropriate Yes

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

The management plan and this entire consultation needs to be refocussed on the extraordinarily (from our perspective with our long involvement with the site) missing full and relevant references to the key statutory, in the sense of local authority planning law, document, the current Midlothian Local Plan. This is only obliquely referred to and incorrectly. Forgive us for using question 1 to start from here (although you do encourage comments beyond these focussed questions) but all our answers below refer naturally to the Wildlife Site designated and protected in this document and to the long proposed in writing use of precisely these Mavisbank estate policies as an LNR, and to our earlier letters to the statutory planning authority dated 2007 and the associated letter from SNH in support of setting up a formal Local Nature Reserve under local authority statute dated in 2006. Both these letters will be supplied to you (effectively again) as part of this response (or in three weeks time if the remote email system we are using to send this to you promptly does not work properly).

Proper research of this Local Plan and LNR and Wildlife Site and Local Biodiversity Site related documents (the letters were sent to and received by Stephen Orr of Land Use Consultants on 15-03-2010) would reveal

- 1). The Midlothian Local Plan was first finalized in 2006 containing the policy **RP12 REGIONALLY AND LOCALLY IMPORTANT NATURE CONSERVATION SITES** Development will not be permitted where it could adversely affect, either directly or indirectly, the nature conservation interest of any sites, or wildlife corridors, of regional or local conservation importance unless the applicant can show that:
- A. the development has been sited and designed to minimise damage to the value of the site and includes measures that will appropriately compensate for any damage which cannot be avoided; or
- B. the public interest to be gained from the proposed development can be demonstrated to clearly outweigh the nature conservation interest of the site.
- Sites of regional or local importance are:
- a Local Nature Reserve (LNR);
 - any other nature reserve (including SWT, RSPB and Woodland Trust reserves);
 - a Wildlife Site (SWT non-statutory wildlife site);
 - a peatland site identified in the National Peatland Resource Inventory as having valuable nature conservation status;
 - woodland identified in the Inventory of Ancient and Semi-Natural Woodland;
 - a Regionally Important Geological Site;
 - areas of woodland identified in the Forest Habitat Network Strategy as having significant value in terms of promoting biodiversity and genetic exchange; or
 - any site which is proposed for inclusion in the above categories (including Listed Wildlife Sites) or any other locally important designation during the lifetime of the Plan.

And listing Mavisbank estate as Mavisbank Estate 284572 WS in appendix 5.

2). The Midlothian LBAP is dated 2006

3). The SNH LNR support letter is dated also 2006

4). The Midlothian Local Plan local Wildlife Site protection of the site for local nature conservation purposes thus dates from 2006 and the 2004 phase 1 (AND phase 2 i.e. detailed species lists, the document incorrectly refers to it as phase 1 only) SWT survey of the site was carried out to enable reassessment of the site as a full (newer, tougher criteria) Wildlife Site from its older Listed Wildlife Site designation and this designation was communicated to and agreed by the Midlothian council in 2004, along with all the other LWS,WS' and hence were listed in the 2006 onwards Midlothian Local Plan with appropriate planning protection.

5). Under the newer even tougher criteria for a now Midlothian Council led Local Biodiversity Site designation (this is the new Scottish Government Guidance name for all reassessed, on 10 year cycle, local wildlife sites for designating in local plans, similar to AGLV's and their similar guidance for landscape designation) the site was redesignated in 2009, which a management plan appendix here notes exists but does not refer to its explicit protection under current and future Local Plans or in fact place it in any context relevant to this management plan. This LBS site achieved a score of 43 (note the pass score is 15 or so) and in fact the site is due under council process to have its boundary slightly changes (changes not concerning the policies of this proposed management plan) early in 2011 where with newer extra species survey information already available the score may rise to as much as 49 or so i.e. this is a very high quality Local Nature Reserve proposal probably with a much higher score than the sole existing Midlothian LNR at Straiton pond.

By referring oddly but correctly to the external to the site Springfield Mill local wildlife site but without referring to the much more relevant to this management plan Mavisbank estate WS,LBS designated by the current Local plan, the SEA of this plan is significantly invalidated and we cannot understand how this can have taken place from the point of view of the SEA process.

No matter, the purpose of a wider consultation is to amongst other things is to discover such rather large gaps but we do not believe that a Historic Scotland proposed Management plan can ignore the local key local planning policy, the Midlothian Council Local Plan.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

By recognising that this is a competent and 4 year old LNR proposal and that such an LNR designation, (where a normal way to proceed would be for HS to sign a management lease for Midlothian Council to manage the policies site 'owned' by HS and set up a formal legal LNR under statute for Local authorities), would precisely engender the ability to have balance between natural and cultural heritage AND be significantly more likely to attract the clearly missing funding for appropriate management of the policies. A LNR is all about a balance between protecting wildlife but giving appropriate access to people to enjoy that wildlife, interpreting appropriately both the natural heritage aspects and cultural aspects of such a site e.g. the Easter Craiglockhart LNR in the City of Edinburgh where the principle author of this response is the convenor, has many cultural and historical aspects to it alongside the natural heritage ones. LNR designation exposes opportunities for wider funding applications for the management of such sites including from SNH, without

necessarily reducing the possibilities for funding for the purely cultural aspects of such sites.

The Midlothian Local Biodiversity Action plan around pages 50 and 51 explains the importance of natural and semi natural greenspaces such as LNR's and candidate LNR's like Mavisbank to local settlements like those that exist close to Mavisbank. In recent years SNH has been encouraging Local Authorities to designate more LNRs in Scotland. It is clear from SNHs requirements for more emphasis on natural heritage issues in the scoping report and the many references to biodiversity enhancement of proposed management activities and possibly adverse biodiversity effects of some, that HS's consultants tried to consider this issue seriously whilst completely missing the key aspect that this site already had a relatively recent planning designation that safeguards the existing natural heritage of the site whilst leaving open the door for the relevant LNR designation that would help HS in its aims to preserve the remaining historical landscapes in balance with the natural heritage .

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

The LNR process is the ideal way to encourage partners and other local stakeholders to get more involved in the management plan writing, implementation and fundraising for such a site.

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

It would be practical at this stage in the development of the water features on the site to interpret the historical roots of the lochan through LNR interpretation rather than spending considerable sums of money to reverse the natural (and apparently more recently) man made processes.

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

By becoming an LNR management plan with first priority natural heritage protection and enhancement alongside people access and cultural interpretation where appropriate.

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

The pathway into the policies from Kevock Rd. could be improved. The possibility of access from Loanhead should be investigated to benefit public-transport users. There are many new-improved better access points to the site proposed and many of these could be part of an LNR management plan but sometimes as the plan here says these would be designed to steer people away from natural refuge areas and leave some wildlife undisturbed by encouraging natural desire line paths around the site

visiting the key natural heritage and cultural features whilst leaving relatively large areas (and some newly designed and enhanced for wildlife areas) relatively undisturbed.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

Many, within the context of an LNR that puts people and wildlife first whilst being able to interpret the historical landscape setting it is now in.

Question 8: Can you identify any additional funding opportunities for the site?

LNR designation could significantly open as yet untapped resources including explicitly allowing SNH to contribute to the setting up of and enhancements to an LNR.

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

LNR designation would do precisely this. As part of the writing of an LNR management plan for the site many small but significant changes could be made including reviewing the current grazing policy. In particular, horses should be kept to defined areas and away from the scarps, wooded/vegetated areas and all other environmentally sensitive habitats.

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

An improved footpath from Kevock Rd to the House would serve this purpose. Setting up a formal LNR could be the most cost effective way of making such links.

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

See answer to question 1 onwards.

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

No, it is not bad as far as it goes but misses the WS, LBS local plan designation and LNR proposal which are key to the future of the site.

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

See question 12.

Question 14: Which scenario do you consider represents your preferred one and why?

With no LNR designation and no effective planning implementation of the protection given to the natural heritage of the site by the Local Plan, scenario 1 is of course preferred. But with an LNR implemented there are even some aspects of scenario 2 that could be considered within such an LNR framework. It is too late for the site to be cost effectively reengineered back to some as yet unclear 100% historical perspective of scenario 3.

Question 15: Are there any other scenarios which we should consider and what are they?

Working with Midlothian Council to designate a formal LNR including landscape cultural heritage aims that are consistent with the statutory aims of HS and an LNR.

Mavisbank Policies Landscape Management Plan Issues and Options Paper

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately. Return to hannah.garrow@scotland.gsi.gov.uk

1. Name/Organisation

Organisation Name

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Forename

2. Postal Address

Postcode EH18 1 HG	Phone <input type="text" value=""/>	Email <input type="text" value=""/>
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3. Permissions - I am responding as...

Individual

/

Group/Organisation

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available

or

Yes, make my response available, but not my name and address

or

Yes, make my response and name available, but not my address

The name and address of your organisation **will be** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

(c)

Are you content for your **response** to be made available?

Please tick as appropriate Yes No

(d) We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Please tick as appropriate

Yes

No

CONSULTATION QUESTIONS

Question 1: How could the management plan encourage further research to help fill knowledge gaps about the site?

The team implementing the Management Plan should include representatives of independent bodies expert in all aspects of the natural-heritage interest of the site, eg SWT, ENHS,RSFS and should be able to call on advice from other specialist groups (eg the local Bat Group) as required. Local representation is also important.

Question 2: How could the management plan best achieve a balance between the needs of nature conservation and cultural heritage?

The historic designed landscape no longer exists: it has disappeared as a result of decades of (mainly benign) neglect. Nature has taken over. Thus the claim that it 'makes a positive contribution to the communities and environment' It should be acknowledged that nature has to some extent superceded the original planned landscape. The latter is still evident but not in its original state. Apart from the area immediately surrounding the house conservation of the natural regeneration should now be the priority and no major works which may disturb this should be carried out.repeated in the panel outlining each of the three proposed scenarios is really a misrepresentation. It is the unique natural environment and landscape of the site that now provide its value and benefit to the community. For that reason, it would be more logical to devote resource to the protection and enhancement of its existing ecology and biodiversity rather than attempt to reconstruct what has completely disappeared. Certainly no work should be undertaken that might damage these aspects of the site. It is also important to minimise disturbance of the wildlife, and so the site should not be promoted as a destination, but access should simply be improved to link with the House and the wider path network in the area.

Question 3: How could the management plan encourage partners and other stakeholders to get more involved in the conservation of the site?

Historic Scotland should devote its efforts and resources to doing what it can to stabilise the structure of the House and to restoring the area directly surrounding it. Responsibility for the grounds should be transferred to SNH and /or the Local Authority with the aim of designating it a Local Nature Reserve. This would have the added advantage of producing more benefit for less cost than any of the scenarios proposed here. Please refer also to my response to Q1.

Question 4: How can the management plan balance the water management of the site with the needs of natural heritage?

Improving access will require some drainage to facilitate the construction of the necessary footpaths. Otherwise water management (drainage?) should be undertaken only if needed to protect or enhance species or habitats, not for the benefit of visitors. It is important that the lochan and other wetlands should not be disturbed.

Question 5: How can the management plan maintain a balance between sustainable tourism and the protection of the site's attributes in the promotion of access and recreation across the site?

Access should be facilitated, but not promoted. Recreation other than walking should be neither facilitated nor promoted in any part of the site. There are adequate urban and country parks in the area for that purpose. The site should not become a destination in its own right, but should be treated as providing a scenic and tranquil element of the footpath routes along and by and around the North Esk Valley.

Question 6: How could the management plan improve accessibility within the site and connectivity outwith the site?

Access to the House and its curtilage should be facilitated by a path from the riverside path, skirting the walled garden. The pathway into the policies from Kevock Rd. should be improved. The possibility of access from Loanhead should be investigated to benefit public-transport users.

Question 7: What opportunities do you think there are for promotion and interpretation of the site?

Promotion should be avoided and 'interpretation' would best be avoided: interpretation boards tend often to be vandalised or left to deteriorate.

Question 8: Can you identify any additional funding opportunities for the site?

No indication is given of the potential cost of the proposals nor of any existing funding sources to which 'additional funding opportunities' could be aggregated.

Question 9: What additional measures do you think would be useful to ensure and enhance the protection of the site?

The grazing policy should be reviewed. In particular, horses should be kept to defined areas and away from the scarps, wooded/vegetated areas and all other environmentally sensitive habitats.

Question 10: How can we preserve the important link between Mavisbank House (not within the scope of this report) and its policies?

An improved footpath from Kevock Rd to the House would serve this purpose. However, the nature of the link between the House and its policies can be considered logically and fully only in the context of some understanding as to the future of the House. The present study is silent on that front, while stressing the importance of the link. To that extent the consultation is flawed and cannot therefore of itself provide a complete answer.

Question 11: Are you content that all the key issues for the site have been identified? If not, please specify.

No account seems to have been taken of cost or available resource in relation to the proposed scenarios.

Question 12: Do you agree with the findings of the environmental assessment? Have we identified key issues associated with these actions/proposals? If not, please specify.

The study has been carried out from a historic designed landscape standpoint. An equivalent study from a natural heritage standpoint would have come up with quite different scenarios.

It should be noted that the status and biological interest of the site do not seem to have been adequately investigated. For example there is no mention that I can find of the fact that the Mavisbank Estate is given as a Wildlife Site in the list of Designated Sites in Midlothian. Similarly, on surveys, the walk-through survey seems particularly inadequate ...and badly timed. No mention, as far as I can see, is made of the detailed site survey carried out by Neville Crowther of SWT and ENHS.

Furthermore, no attempt seems to have been made to obtain records gathered over many years by local residents such as Prof. Rankine. Collecting a complete database of such information would have to be a first objective of any future management plan.

Question 13: Do you have any comments on the mitigation measures set out in Annex A?

No

Question 14: Which scenario do you consider represents your preferred one and why?

The minimum interference with the site is provided by Scenario 1.

Question 15: Are there any other scenarios which we should consider and what are they?

Please refer to my response to Q3.

It isn't clear that HS have the financial resource to implement even the least of these scenarios. If they have, or hope to have in the future, it would be much more important to devote such funds to sorting out the ownership of the House, stabilising its structure and providing better access to it.

It is wrong to consult on the present proposals in isolation from any consideration of the future of the House.