

Citizen Participation and Public Petitions Committee
Wednesday 12 June 2024
11th Meeting, 2024 (Session 6)

PE2089: Stop More National Parks in Scotland.

Introduction

Petitioner Deborah Carmichael on behalf of Lochaber National Park - NO more group

Petition summary Calling on the Scottish Parliament to urge the Scottish Government to:

- Suspend any action to create further National Parks in Scotland.
- Instruct an independent review on the operation of the current National Parks, including assessment of the economic impacts on businesses & industries within the two parks including, but not exclusive to, farming, forestry, crofting and angling.
- Conduct a consultation with representatives of rural businesses & Community Councils in order to help to frame the remit of said independent review.

Webpage <https://petitions.parliament.scot/petitions/PE2089>

1. This is a new petition that was lodged on 12 March 2024.
2. The petition summary is included in **Annexe A**.
3. A SPICe briefing has been prepared to inform the Committee's consideration of the petition and can be found at **Annexe B**.
4. Every petition can collect signatures while it remains under consideration. At the time of writing, 2,212 signatures have been received on this petition.
5. The Committee seeks views from the Scottish Government on all new petitions before they are formally considered.
6. The Committee has received written submissions from the Cabinet Secretary for Rural Affairs, Land Reform and Islands, and the Petitioner, which are included at **Annexe C** of this paper.
7. Members may wish to note that [Mark Ruskell MSP submitted a written question on new National Parks which was answered by the Cabinet Secretary for Rural Affairs, Land Reform and Islands on 16 May 2024](#).

Action

8. The Committee is invited to consider what action it wishes to take on this petition.

**Clerks to the Committee
June 2024**

Annexe A: Summary of petition

PE2089: Stop More National Parks in Scotland.

Petitioner

Deborah Carmichael on behalf of Lochaber National Park - NO more group

Date Lodged

12 March 2024

Petition summary

Calling on the Scottish Parliament to urge the Scottish Government to:

- Suspend any action to create further National Parks in Scotland.
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Background information

Using the two existing National Parks (NPs) in Scotland as examples:

Over 10 years each new NP will cost the Scottish taxpayer £130m. Inappropriate use of money when public finances are weak. The new NP, will be bureaucratic, employing 100+ people, with a paid board of approximately 20, mostly unelected, directors.

The NP will not help with the major issues that already exist in rural Scotland, i.e. roads, medical services, schools needing urgent investment. In areas such as Skye & Lochaber, Small & Western Isles, there is already over-tourism in the summer period and poor road & ferry networks. A NP will only make this problem worse. The Scottish Government requires the local communities to be keen to have a new National Park in their region. It is felt locally that fewer than 10% of local people near Lochaber are engaged. At public meetings, radio phone ins, the response to press articles, & social media engagement the vast majority of people are not in favour of another National Park in Scotland.

Annexe B: SPICe briefing on petition PE2089



The petitioner is calling on the Scottish Parliament to urge the Scottish Government to:

- Suspend any action to create further National Parks in Scotland.
- Instruct an independent review on the operation of the current National Parks, including assessment of the economic impacts on businesses & industries within the two parks including, but not exclusive to, farming, forestry, crofting and angling.
- Conduct a consultation with representatives of rural businesses & Community Councils in order to help to frame the remit of said independent review.

Background – proposals and process for designating a new National Park in Scotland

- The Scottish Government has [committed to designating a new National Park in this Parliamentary term](#). In May 2022, the Scottish Government [consulted on a draft nominations and appraisal framework](#) which sought views amongst other things on the role that National Parks can play in restoring nature, tackling climate change, promoting sustainable land use and supporting public and community wellbeing. Following this, NatureScot was asked to provide detailed advice to the Scottish Government following a stakeholder engagement process. This was provided in February 2023.
- The [Strategic Environmental Assessment \(SEA\) on The Future of National Parks in Scotland was published in September 2023](#) and states that “These consultations have shown that many people want to see new National Parks in Scotland. They also highlighted the important leadership role of National Parks in tackling the interlinked crises of climate change and biodiversity loss, whilst also welcoming visitors and supporting local communities and businesses”.
- Formal nominations were invited on 12 October 2023 with a deadline of 29 February 2024. The Scottish Government [announced that five nominations were made and will be appraised](#) – for the Scottish Borders, Galloway, Lochaber, Loch Awe and Tay Forest.
- The [Scottish Government has set out the process for approval of a new National Park](#). It states:

“any new National Park should be designated in response to local community demand. It should also support progressive development, address the climate emergency in the way we use our land and improve public and community wellbeing”.

“Nominations for new National Parks will be appraised in spring 2024. If at least one nomination is selected to become a new National Park, a statutory process will then begin. A reporter will be appointed to lead an investigation and consultation on the National Park proposal and to produce a report. This report will be published and laid before Parliament.”

- The Scottish Government [Appraisal Framework Guidance](#) sets out further detail. For example, it sets out strategic aims for new National Parks which include contributing to green skills and jobs, nature restoration, nature-friendly farming and climate action. Assessment criteria are set out across a range of areas. In relation to tourism pressures for example, one of the assessment criteria is that “Proposals clearly demonstrate potential of a National Park designation to support sustainable tourism that contributes to net zero, nature positive society, improves community wellbeing and delivers shared prosperity”.

Background – existing National Parks and underpinning legislation

- There are two National Parks in Scotland; Lomond & The Trossachs National Park was established in 2002 and Cairngorms National Park was established in 2003. A [brief history of their creation can be found on the NatureScot website](#). Scottish Natural Heritage (now known as NatureScot) [provided advice on the creation of these two National Parks and how they should operate in 1999](#) following a review, including a brief review of international experience.
- The statutory aims of National Parks in Scotland are set out in [section 1 of the National Parks \(Scotland\) Act 2000](#) and are:
 - (a) to conserve and enhance the natural and cultural heritage of the area,
 - (b) to promote sustainable use of the natural resources of the area,
 - (c) to promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public, and
 - (d) to promote sustainable economic and social development of the area’s communities.

Section 9(6) of the 2000 Act states that, if it appears to the National Park authority that there is a conflict between the National Park aims, the authority must give greater weight to the first aim (to conserve and enhance the natural and cultural heritage of the area).

- The [NatureScot website sets out detailed information on the governance and powers of National Parks](#). Each National Park has a National Park authority, which are executive non-departmental public bodies (NDPBs) reporting to Scottish Ministers, and are responsible for writing a national park partnership

plan. They have powers to further the Park's aims through for example: entering into management agreements, making bylaws and management rules, providing grants, advice and assistance, buying and managing land, making access arrangements and providing information, education and ranger services. Loch Lomond and The Trossachs National Park Authority is also responsible for deciding all [planning applications](#) in the National Park area. The [planning system](#) in the Cairngorms National Park is managed by the Cairngorms National Park Authority and the five local authorities which operate in the National Park, with the Park Authority 'calling in' and deciding those applications which are big or important to the National Park.

- The 2023 Scottish Government consultation [on Scotland's Strategic Framework for Biodiversity](#) included proposals to amend the above 2000 Act to "strengthen the leadership role of National Parks in tackling the interlinked crises of climate and biodiversity". Detailed proposals are set out in the consultation (pp78-88).
- NatureScot [has a webpage on 'The Value of National Parks in Scotland' which includes information about impacts of National Parks across a range of areas. It states:](#)

"Our National Parks support thriving local economies, manage millions of visitors and protect the natural environment for the benefit of current and future generations. They play a significant role in generating and leveraging investment, creating new employment opportunities and bringing communities together to address local priorities".

Stakeholder views on a new National Park

- The Scottish Campaign for National Parks is a Scottish charity campaigning for the designation of new National Parks (including specific campaigns for new National Parks in the Scottish Borders and in Galloway). It has published a number of reports including a 2013 review of the potential benefits of new National Parks (updated in 2018), and more recently, reports looking in more detail at proposals in specific areas e.g. in 2019 the charity published a commissioned report on [the potential socioeconomic impacts of a new National Park for Galloway](#).
- The National Farmers Union Scotland (NFUS) [published a blog in October 2023 raising concerns about a new National Park](#), noting mixed views from its Members, and called on a new National Park to "prioritise agriculture and food production". More recently, [in February 2024 NFUS set out its opposition to a new National Park based on a consultation with its Members](#), stating concerns that a new National Park could "increase bureaucracy and stifle growth, innovation and development", increase access-related issues, reduce housing availability for the local population and prioritise tourism and visitor access over farming.
- The Lochaber submission was coordinated by [the Lochaber National Park Working Group \(LNPWG\)](#) and [the full submission can be found online](#). The submission sets out how a new National Park in the area could support rural communities and sustainable tourism and align with national goals such as net

zero. The bid has also [faced local opposition from the campaign group Lochaber National Park – No more](#) (the petitioner) with [some media reports describing the nomination process as having been a divisive issue](#) for rural communities.

- Other nominations have generated some local debate with groups and bodies taking a range of positions. [In the Scottish Borders, councillors voted in December 2023 not to support the nomination](#). East Ayrshire councillors [voted in February 2024 in support of the creation of a National Park in Galloway](#) citing the potential opportunities for neighbouring communities and community development.

Scottish Parliament action

- The creation of a new National Park [was discussed briefly with stakeholders in the Net Zero and Transport \(NZET\) Committee on 9 January 2024](#) as part of a broader evidence session on the Scottish Biodiversity Strategy and draft Delivery Plan.

Alexa Morrison, Senior Researcher

16 April 2024

The purpose of this briefing is to provide a brief overview of issues raised by the petition. SPICe research specialists are not able to discuss the content of petition briefings with petitioners or other members of the public. However, if you have any comments on any petition briefing you can email us at spice@parliament.scot

Every effort is made to ensure that the information contained in petition briefings is correct at the time of publication. Readers should be aware that these briefings are not necessarily updated or otherwise amended to reflect subsequent changes.

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Annexe C: Written submissions

Cabinet Secretary for Rural Affairs, Land Reform and Islands submission, 22 May 2024

PE2089/A: Stop More National Parks in Scotland

Dear Jackson Carlaw MSP (Convenor),

Please see below the Scottish Government's response to the petition:

PE2089: Stop More National Parks in Scotland

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Scottish Government response to the petition

In May 2023 the Scottish Government invited expressions of interest in new National Parks and we received a positive response from communities and organisations across Scotland. In October 2023 the Scottish Government invited communities to explore, develop and submit nominations for their area to be considered for designation as Scotland's next National Park. This followed a number of public consultations on new National Parks and on the criteria for new National Parks that was set out in our published appraisal framework: [New National Parks: nominations guidance and appraisal framework - gov.scot \(www.gov.scot\)](https://www.gov.scot/publications/new-national-parks-nominations-guidance-and-appraisal-framework/pages/1-to-4.aspx).

Five nominations were received by 29 February 2024 from Galloway, Lochaber, Loch Awe, Scottish Borders and Tay Forest.

The appraisal of these nominations is underway and the nominations are being assessed against the six published criteria in the appraisal framework: outstanding national importance; size, character and coherence; meeting the special needs of the area; strategic contribution; visitor management and tourism; and local support.

Nominating groups were asked to set out the rationale for a new National Park in their area and to demonstrate and provide evidence of how their nomination meets each of the criteria. In terms of the local support criterion, nominations were required to set out who has been involved with the development of the nomination and to demonstrate the level of local support for the proposal. They were also asked to explain how they have engaged with local communities and interest groups in the development of the proposal. This includes residents, community bodies, landowners and managers, businesses, third sector organisations, public bodies and relevant local authorities. The guidance also requires nominations to include details

of any concerns and opposition from stakeholders and affected communities. We recognise that within some communities there are concerns about the impact a new Park could have in their area.

The appraisal process is expected to conclude shortly and a report is to be provided to Ministers in the Summer.

Once an area or areas have been identified by Ministers, the statutory process for designating a new National Park will commence. This includes a formal 'reporter' process which will involve extensive, further engagement working with communities and businesses in the proposed area(s), including a formal 12 week consultation on the proposal. There would also be a further 12 week consultation of any draft designation order before being considered by Parliament.

With regard to the economic, social and environmental value of National Parks, evidence shows that our existing National Parks support thriving local economies, help to manage millions of visitors and protect the natural environment for the benefit of current and future generations. Our parks play a significant role in generating and leveraging investment, creating new employment opportunities and bringing communities together to address local priorities.

For example, the Cairngorms 2030 programme supports 25 projects across Cairngorms National Park. The total value of the programme is £42.3 million, including over £10m funding from the National Lottery Heritage Fund. These projects deliver benefits for rural communities and businesses across a range of areas including health and wellbeing, nature restoration, Net Zero and sustainable transport.

In Loch Lomond & the Trossachs National Park, the Park Authority plays an important role in the experience of millions of visitors to the National Park each year through its investment in visitor sites and hubs, support for outdoor learning, investment in digital technologies, ranger services and investment in the Park's recreational facilities and path network. Nearly £450 million was generated in the local economy in 2022 through visitor and tourism businesses.

An overview of the performance of the existing two National Park Authorities in Scotland is provided annually through their published Annual Report and Accounts. These are available here for 2022-23:

[Microsoft Word - 231218 Final Accounts 2022-23 \(Cairngorms.co.uk\)](https://www.cairngorms.co.uk/231218-Final-Accounts-2022-23)

[LLTNPA-Annual-Report-and-Accounts-2022-23.pdf \(lochlomond-trossachs.org\)](https://www.lochlomond-trossachs.org/LLTNPA-Annual-Report-and-Accounts-2022-23.pdf)

MAIRI GOUGEON

Petitioner Submission, 4 June 2024

PE2089/B: Stop More National Parks in Scotland

We are grateful to the committee for the opportunity to put our case against the expansion of national parks in Scotland, and we remain specifically concerned about

the possibility of Lochaber being selected, should the Scottish Government decide to press ahead.

To an extent It is understandable that the Scottish Government should use its initial response to defend its existing policy, but we are disappointed that there is no acknowledgement of the widespread and well-documented problems associated with the existing two national parks, and we remain convinced that an independent review of their operations is essential before any decision is taken to add a third.

That would surely just be common sense, and at least provides an opportunity to improve the current operations.

But we are primarily concerned that the response indicated that the many people in Lochaber firmly opposed to a national park in our area will not have their voices heard and we hope the committee will go some way to addressing our fears.

Our concerns are as follows:

1. The consultation with communities has been inadequate, without a rigorous process for obtaining an accurate assessment of local opinion, and we do not accept there is broad support for a national park in Lochaber.
2. Rather than a national park, the most pressing needs of Lochaber are the provision of adequate road connections and health care. The A82 is need of upgrading and with the current volume of visitors, our transport infrastructure is at breaking point. It would be irresponsible to attract more tourism until this is addressed.
3. The issue which does have widespread support is to replace the Belford Hospital, a £160m project due in 2028 which was put on hold when the Scottish Government paused capital projects at the beginning of 2024. We cannot understand how the Scottish Government can countenance national park running costs of at least £13m a year, what it currently costs the Cairngorms Park while this crucial project remains blocked.
4. Our own consultations with landowners resulted 100 per cent opposition to a national park for Lochaber. If a key requirement for a successful national park bid is support from key stakeholders, there can be none more crucial than those who own the land it will cover.
5. The Scottish Government recently promised its approach to its depopulation strategy would be “Local by default, National by agreement.” In our view, that would be inconsistent with any attempt to impose a national park in Lochaber against demonstrably widespread local opposition.
6. Given the Loch Lomond and Trossachs (LLTNP) and Cairngorm (CNP) parks have been in existence for 21 years, a proper independent review would make sense, and such an analysis would be incomplete without the views of residents. From our many conversations, we know local attitudes are far from positive.
7. Claimed “investments” by CNP are not, in our experience, ones which locals supported. Beavers were introduced against the wishes of local farmers/crofters who

have now established a group to defend their interests. In both the CNP and LLTNP areas, landowners and farmers are increasingly concerned about needless bureaucracy, over-regulation, and a general dismissiveness towards the needs of those who look after the land.

8. The Flamingo Land proposal is the best possible example of local opinion being ignored by a National Park with full control over planning. To date there have been over 94,000 public objections, yet it has LLTNP support, despite its primary aim supposedly being conservation. It is hardly surprising that so many local people are horrified, and it does bring into question the whole purpose of the national park system. We would argue the LLTNP support for Flamingo Land is adequate justification for full parks review on its own.

9. Where local opinion has been canvassed within existing parks, the response has been overwhelmingly negative. In Aviemore and Spey Valley, a community referendum found 92 per cent of respondents (444 votes) said CNP “was not working well”. Only 10 people thought it was.

10. When Perth and Kinross Council recently sought views about a new park, it received just 352 responses out of a population of approximately 68,000, and less than 200 were supportive, many of them living outside the area. But 78 per cent of all land managers who responded were opposed.

11. Under the Bute House Agreement, which included national park expansion, the Scottish Government was clear that ministers would “only designate new national parks in response to local community demand,” yet has repeated its intention to create at least one. With strong likelihood that none of the five bid areas under consideration can demonstrate community demand, this suggests the creation of a new park is already a foregone conclusion and the only remaining decision is which one. Therefore, we have significant concerns about the fairness and openness of the selection process, and this requires further parliamentary scrutiny.

12. Lochaber farmers, fishermen, crofters, and land managers are deeply sceptical about Nature Scot, and as they are to play a crucial role as Reporter there is little confidence that in the national park selection process will be as even-handed as it needs to be.

We hope you can see our concerns are not inconsiderable or without substance and we hope to have the opportunity to discuss them with the committee in person.