

Citizen Participation and Public Petitions Committee
Wednesday 30 October 2024
16th 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. [The Committee previously considered this petition at its meeting on 12 June 2024](#). At that meeting, the Committee agreed to write to the Scottish Government.
2. At its meeting on 11 September 2024, [the Committee considered its work programme and agreed to hear evidence on this petition](#).
3. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition is at **Annexe B**.
4. The Committee has received new written submissions from the Cabinet Secretary for Rural Affairs, Land Reform and Islands, and the Petitioner, which are set out in **Annexe C**.
5. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage](#).
6. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
7. Every petition collects signatures while it remains under consideration. At the time of writing, 3,409 signatures have been received on this petition.

Today's Meeting

8. At today's meeting the Committee will hear evidence from:

- Denise Brownlee, No Galloway National Park campaign group
 - Mhairi Dawson, National Farmers' Union Scotland
 - Nick Kempe, Parkswatch Scotland
 - Ian McKinnon, Lochaber National Park - NO more Campaign
- and then from:

- Rob Lucas, Galloway National Park Association
- John Mayhew, Scottish Campaign for National Parks

9. The Committee intends to hear evidence from NatureScot and the Cabinet Secretary for Rural Affairs, Land Reform and Islands in due course.

**Clerks to the Committee
October 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.
- 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 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: Extract from Official Report of last consideration of PE2089 on 12 June 2024

The Convener: PE2089, which has been much anticipated by members of the committee, has been lodged by Deborah Carmichael on behalf of the Lochaber National Park—NO More group. The petition calls on the Scottish Parliament to urge the Scottish Government to suspend any action to create further national parks in Scotland; to instruct an independent review on the operation of the current national parks, including an assessment of the economic impacts on businesses and industries within the two parks including, but not exclusive to, farming, forestry, crofting and angling; and to conduct a consultation with representatives of rural businesses and community councils in order to help to frame the remit of the said independent review.

In responding to the petition, the Scottish Government noted that the appraisal phase for the new national park has concluded and that a report is due imminently this summer. It adds that it has consulted local communities throughout the process and that further consultation will take place when the new national park process moves on to its reporter phase. It also points to evidence that 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. That includes 25 projects across the Cairngorms national park and the £450 million that was generated in the local economy in 2022 through visitor and tourism businesses in the Loch Lomond and the Trossachs national park.

In response, the petitioner raised concerns that the Scottish Government appears not to have acknowledged the

“widespread and well-documented problems associated with the existing two national parks”,

and reiterates her call for an independent review of national parks to take place before a new park is created, especially given that no review has been conducted in the 21 years since the current national parks were created. The petitioner states that, in the current national park areas, landowners and farmers are increasingly concerned about overregulation and the needs of those who look after the land being dismissed.

Do colleagues have any comments?

Fergus Ewing: I declare that I live in the Cairngorms national park and I used to live in the Loch Lomond and the Trossachs national park. Back in 2006, I supported a petition relating to the creation of a marine national park when it came before the Public Petitions Committee. I have also been working with the petitioners on this issue generally. I just wanted to put that on the record.

The key ask is that before you create new bodies, you should, logically, have an independent review of how the existing bodies are performing. That is a fairly strong argument. That review should be independent and should be conducted after careful

thought has been given to the remit. A number of people should be consulted about that. I make no bones about it. That is logical and desirable, and it should take place.

As far as I can see from my reading of the Scottish Government's response, which is two pages long, there is no response whatever to that argument. I find that quite shocking. I am bound to reflect that this is not the first time that that has happened. The permanent secretary should be asked to have a look at Scottish Government responses before they come to the committee, because they are surely quite insulting. The main thesis that I have outlined is simply not addressed at all.

The only bit that I could find that remotely approached the issue was the last paragraph, which says:

"An overview of the performance of the ... National Park Authorities ... is provided annually through their published Annual Report".

That is their own document. Yes, the annual report is a statement about what has been done during the year, but it is by no means independent, and nor can it ever be professed as such. Therefore, the reply is utterly irrelevant. Irrespective of the fact that I have a clear position on the matter, I think that, as a committee, we should be concerned about receiving irrelevant documents from the Scottish Government instead of reasoned arguments about why it thinks that something is not appropriate.

There are lots of other points that I could make, but I will make just one substantial point. Paragraph 9 of the petitioners' response of 4 June points to a recent online opinion poll that was conducted in Aviemore by the community forum. I think that 444 votes were cast on the basis that the park was not working well, and 10 local residents—a paltry 3 per cent—felt that the park was performing well. I am quite fond of referenda, and I would quite like to get 96 per cent in a referendum. That result shows that the Scottish Government's presentation that all is well in the garden, and that all the good things result from the national park and not from people's hard-working efforts, is just not the case at all. I thought that I would mention that for the sake of balance, because there is none in the Scottish Government's response.

The options for action that I would advocate to committee members are threefold. First, I would like to write to the Scottish Government to draw attention to the remarks that have been made.

The Convener: How strongly would you like that to be worded, Mr Ewing?

Fergus Ewing: I have strong views, but I accept that this is a committee and that other members may have different views.

The Convener: I take your point that the Scottish Government did not really address the issues of the petition in its initial response. I also take your point about drawing attention to the Scottish Government's own homework as evidence of anything. It would be surprising if the Scottish Government came back and said that it did not think that it had been doing a good job or that the whole thing was not a stunning success—that does not tend to be what Government reports on its own homework do. Therefore, there is nothing particularly independent in the character of that.

Should the committee be quite strong in the recommendation that the Scottish Government should respond seriously to the issue that the petitioner has raised and that an independent voice should be appointed to conduct a review of the petition?

Fergus Ewing: Yes. I think that that would be in the Government's interests because, if an independent review was conducted and it came back with a positive outcome, people like me would be bound to act on the basis of evidence. I do not think that that would occur but, if it did, as a result of a genuinely independent review, that would strengthen the Government's position to argue for more national parks.

A complete absence of an independent review seems to represent a gap, and a lack of logic in creating a new body, in particular when it costs a lot of money. People in Lochaber have said that they want the new Belford hospital—they do not want a new national park.

The two suggestions that are before us should be taken up. As you suggested, convener, we should write in strong terms to the Scottish Government to ask whether, after 21 years of national parks, it will arrange for an independent review in the terms that the petitioner has set out.

The second question is one of consent, and how the Scottish Government will verify evidence that is provided to it in new national park proposals, in particular with regard to the levels of local support and community engagement. The petitioner argues that there is strong opposition in Lochaber and elsewhere. The NFU Scotland has come out against further national parks; it is somewhat unusual for the NFU to be so clear, and that is significant. Opinion polls have been taken among farmers in places that were candidates for the creation of new national parks. For example, on Skye, in a meeting of more than 100 farmers and crofters, every single one of them was against a national park.

We should also hear evidence from the petitioners so that they can describe the situation in their own words. Deborah Carmichael and Ian McKinnon are friends of mine; I think that they, along with one other, have a very strong case, and it is right that they be heard. I fear that, whatever we say, the Government seems to be hell-bent on the process, no matter what. We therefore need to give a voice to people whose voice has been ignored thus far, to the extent that, in the response that we have had from the Government, their arguments have been completely ignored.

I am sorry to go on at such length to colleagues—I seek your discretion, convener, because of the obvious interest that I have in the matter.

The Convener: I also note that 78 per cent of land managers in Perth and Kinross were against a national park. At present, the issue that probably has most traction in the minds of many people is that of the Flamingo Land park, which is being proposed within the national park in that area. Something like 94,000 people have objected. People then wonder just exactly what the basis of a national park is. I suppose that it is open to the committee, through our interrogation of other witnesses beyond even the petitioners, to potentially establish an independent assessment of how these matters are progressing.

Are colleagues content to write to the Scottish Government in the first instance, on the basis that Mr Ewing has suggested?

Members *indicated agreement.*

The Convener: We will keep the petition open; I thank the petitioners for raising the issue. We will proceed as I set out in the first instance, and I expect that we might potentially take further evidence on the issue later in the year.

Annexe C: Written submissions

Cabinet Secretary for Rural Affairs, Land Reform and Islands written submission, 21 August 2024

PE2089: Stop More National Parks in Scotland.

Thank you for your letter of 18 June 2024 regarding the Citizen Participation and Public Petitions Committee's consideration of the above petition. I apologise for the delay in responding.

In your letter you have asked two questions: (i) whether we intend to carry out an independent review of existing National Parks including their economic impacts on businesses and industries within the two parks; and (ii) what action has been taken to ensure local consent for National Parks and how the Scottish Government verifies the evidence provided to it, particularly evidence about local support for new National Park proposals.

In response to the first point, there are no current plans for the Scottish Government to conduct an independent review of the two existing National Parks in Scotland. That is because National Parks are accountable to their boards and to the Scottish Government. The Scottish Parliament may also scrutinise the Parks' performance directly as it does with other public sector bodies.

National Park authorities are required to produce a five year National Park Partnership Plan (NPPP) and their Corporate Plans are aligned to these. These Plans, including the aims and objectives within them, are signed off by Ministers. National Parks regularly report to their boards on performance against the aims and objectives within their Plans. National Park authority boards contain a mixture of Ministerially appointed, locally elected and local authority nominated members which adds a level of local accountability.

National Park authorities develop Annual Operating Plans once their yearly budget is known. These set out how Parks will deliver against their Corporate Plans and the NPPP. Delivery is monitored, evaluated and reviewed at regular official-level meetings between the Scottish Government and National Park authority Convenors and Chief Executives. Additionally, Park authorities are required to report on their delivery and performance through their Annual Report and Accounts which are laid before Parliament. As I mentioned in my previous letter, these are publicly available for 2022-23:

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

With regard to the proposal for a new National Park in Galloway I can confirm that, alongside the reporter investigation and public consultation into the proposal that will be undertaken by NatureScot, the Scottish Government is starting work on a series of impact assessments. These will include:

- a Business and Regulatory Impact Assessment (BRIA) to assess the potential costs, benefits and risks that the proposal may have on the public, private, third sector or regulators;
- a Strategic Environment Assessment (SEA) to assess the likely significant environmental effects of the proposal;
- an Equality Impact Assessment (EQIA) to assess the potential impacts of the proposal on the equality groups;
- a Child Rights and Wellbeing Impact Assessment (CRWIA) to assess the potential impacts of the proposal on the rights and wellbeing of children and young people; and
- a Fairer Scotland Duty assessment to assess how the proposal could potentially reduce inequalities of outcome caused by socio-economic disadvantage.

These impact assessments will be evidence-based and their results will help to inform any final decision on whether a new National Park should be designated in Galloway. We will give the reports of each impact assessment careful consideration, alongside the report that NatureScot will provide following its investigation and public consultation. As I said when I announced the proposal, if there is to be a new National Park in Galloway, it must take account of local circumstances and help meet the needs of local communities.

Turning to your second question, NatureScot – as the Reporter - will now conduct an investigation into the proposal which will include extensive stakeholder engagement and public consultation. We want to hear people's views on whether Galloway should become Scotland's next National Park. NatureScot will engage with communities, businesses, public bodies and interested parties including representatives working within the agriculture, forestry and other land-based sectors given their importance within the area.

As we have outlined in the [National Park Proposal](#), the consultation should be participatory, inclusive and equality-focused. It should ensure that people living and working in the area have an opportunity to discuss the issues, consider the content of the proposal including the desirability of a National Park in the area and suggest any alternatives.

Any online consultation tools will of course need to be used with suitable care by the reporter to ensure responses are legitimate and to identify multiple responses by individuals or groups. In addition to online consultation methods, we anticipate the following elements to form part of this engagement and consultation work:

- A consultation paper seeking written responses on key elements of the proposals;
- A summary consultation leaflet seeking views on the key elements of the proposals distributed to all households in the proposed area;

- A series of independently facilitated public meetings and drop-in surgeries;
- Events and surveys for businesses and land management groups;
- Specific initiatives for young people and under-represented groups; and
- An independent evaluation of the effectiveness of the consultation process.

NatureScot will submit their findings to the Scottish Government by 28 April next year and the reporter's report will be laid in Parliament. If we decide to proceed with the National Park proposal – with or without modification – secondary legislation will then need to be developed, consulted on and approved by Parliament in order to designate the proposed new National Park.

I hope that I have addressed the Committee's questions and I apologise again for the delay in responding.

Yours sincerely,

Mairi Gougeon
Cabinet Secretary for Rural Affairs, Land Reform and Islands

Petitioner written submission, 3 September 2024

PE2089/D: Stop More National Parks in Scotland

It is with great disappointment that we note the response to the requests in our petition from Cabinet Secretary Mairi Gougeon, dated 21 August 2024.

We find it very hard to understand her refusal to commit to an independent review and analysis of the existing national parks, and her letter again wholly fails to respond to the central omission from the entire approach of her government to their operation.

Ms Gougeon correctly says there are plans and board members, but these are not independent, and it is our understanding from engagement with some board members that they are all required to support the park. It is also our understanding that in one park there is a series of complaints and disputes between members and the CEO.

Further, several elected members on the "local" element of the board claim they must comply with the CEO's wishes. In other words, they must toe the line. If the locally elected members of the board cannot represent the interests of local people, then any claim that the national parks are democratically accountable is little more than a sham.

Such allegations themselves should be worthy of an independent investigation, but in the 21 years of their existence there has never been an independent analysis and review of how the parks have performed. This is a major failing.

Further, a recent poll by a local community forum asked its members if the Cairngorm National Park had performed well and 92 per cent said No. Only 3 per cent said it had, so surely a curious minister about to launch a third national park would want to find out why there was such overwhelming concern.

We find it extraordinary to read that Ms Gougeon is not provisionally open to independently reviewing the existing national park and opening its performance to public scrutiny, nor polling the residents and businesses in the national park areas to find out how they now feel about their impact.

But it's abundantly clear from surveys conducted by residents, the NFUS, crofting communities and businesses that there is great concern and discontent from within these existing parks. Perhaps Ms Gougeon does not trust these results, so surely the best way to verify their findings or otherwise is to conduct fully independent research.

Now the Scottish Government has decided to press ahead with the proposed Galloway national park, common sense surely dictates that an impartial assessment of the existing two parks should be conducted so residents can reach a considered view in full possession of all the facts?

Unless there is something to hide, surely Galloway's people are entitled to an independent assessment if the current consultation is to be of any genuine value? As it stands, they are being presented with a one-sided government policy and the national parks authorities' self-marked homework. That cannot be right.

It only makes sense if the Scottish Government intends to proceed even if residents in the proposed Galloway park area oppose it, which is surprising from a party which believes the people of Scotland should decide their own fate and future. Surely Gallovidians cannot be excluded from that, unless SNP ministers think they know better than ordinary local people?

It is unclear how exactly NatureScot will assess or determine whether there is or is not sufficient support to proceed with the Galloway park so why not ask the people in a referendum?

We know the Scottish Government wants another national park, but the consultation cannot be skewed to produce a pre-ordained result, and the only way NatureScot can guarantee it too is not biased is by a referendum, or at least by commissioning a demonstrably independent, in-depth survey. For such a far-reaching decision, there can be no suggestion of a stitch-up.

If it is the case that conducting an accurate measurement of opinion in Galloway would be too costly, then the logical course of action is to abandon a plan which otherwise risks dragging the majority into a national park against their will.

In the existing park areas, an independent review of their operations is the least people in those areas deserve, and we would respectfully urge the committee to uphold our petition.