

Citizen Participation and Public Petitions Committee
Wednesday 27 November 2024
18th 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. Three oral evidence panels have taken place so far as part of the Committee's consideration of this petition:

- [On 30 October 2024 the Committee heard from Denise Brownlee, No Galloway National Park campaign group, Mhairi Dawson, National Farmers' Union Scotland, Nick Kempe, Parkswatch Scotland, and Ian McKinnon, Lochaber National Park - NO More Campaign.](#)
- [On 30 October 2024, the Committee also heard from Rob Lucas, Galloway National Park Association and John Mayhew, Scottish Campaign for National Parks.](#)
- [On 13 November, the Committee heard from Peter Rawcliffe, Head of People and Places, NatureScot and Eileen Stuart, Deputy Director of Nature and Climate Change, NatureScot.](#)

2. The petition summary is included in **Annexe A** and the Official Report of the Committee's last consideration of this petition on 13 November is at **Annexe B**.

3. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage.](#)

4. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
5. Every petition collects signatures while it remains under consideration. At the time of writing, 3,484 signatures have been received on this petition.
6. At today's meeting the Committee will hear evidence from:
 - Mairi Gougeon, Cabinet Secretary for Rural Affairs, Land Reform and Islands
 - Brittany Brown, Policy Lead – New National Parks, Scottish Government
 - Lisa McCann, Head of Biodiversity, Scottish Government

Action

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

**Clerks to the Committee
November 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 13 November 2024

The Convener: Agenda item 2 is consideration of continued petitions. Following the evidence session at our previous meeting, we will start with PE2089, which 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 of the operation of the current national parks, including an assessment of the economic impacts on businesses and industries in 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 to help frame the remit of said independent review.

At our meeting on 30 October, which I referred to a moment ago, we heard from two groups. First, we heard from Denise Brownlee from the No Galloway National Park campaign group, Mhairi Dawson from National Farmers Union Scotland, Nick Kempe from Parkswatch Scotland and Ian McKinnon from the Lochaber National Park—NO More campaign. We then heard from Rob Lucas from the Galloway National Park Association and John Mayhew from the Scottish Campaign for National Parks.

Today, we will take evidence from Pete Rawcliffe, head of people and places, and Eileen Stuart, deputy director of nature and climate change, NatureScot. I give a very warm welcome to you both.

Mr Rawcliffe, I am genuinely intrigued to know what the head of people and places actually means. I understand the people bit, but I am trying to understand the places bit. Could you explain what your title means?

Pete Rawcliffe (NatureScot): I am in charge of NatureScot's national team dealing with the people side of our remit that relates not to human resources but to our engagement with nature, including national nature reserves and national parks.

The Convener: What about the places bit of your title?

Pete Rawcliffe: It is about nature and people coming together in a place, so place making is a really important part of the connection to nature.

The Convener: Thank you. That explains it for those following along who might have been wondering what it meant, as we were.

We will move straight to questions, as we have done on the other occasions. Please feel free to add anything that you want to say, and there will be an opportunity later for you to mention anything that you feel that we have not touched on.

I invite Maurice Golden to lead on the initial theme of our questioning.

Maurice Golden (North East Scotland) (Con): Thank you, convener, and I welcome the witnesses to the meeting.

I will start at the beginning. When the existing national parks were assessed, what sort of evidence was sought or research conducted to inform whether a new park should be put in place?

Eileen Stuart (NatureScot): The existing national parks have been in operation for a number of years, as you know. There are national park plans, the parks report regularly to their boards, and they have their own targets, monitoring and assessment. The national parks have a strong record in delivery, and, obviously, we have worked with them on a number of projects to restore nature, tackle climate change and support communities and economic development.

There is quite an established body of evidence on the impact of the national parks, and that is what lay behind the proposal to develop a new one. In 2022, we carried out a consultation in which we surveyed more than 1,000 representative individuals across Scotland, and 89 per cent of responders were supportive of a new national park. A weighty body of evidence and public support was gathered, and that obviously helped inform the Government's thinking about whether national parks were effective and were addressing the climate and nature emergency and whether there should be more of them in Scotland.

Maurice Golden: Thanks for that. With onshore wind projects, for example, we have found that Scotland is broadly supportive of them until they are close by. It might be quite interesting to consider that same element in any further research on national parks.

Obviously, the consultation period is just starting, but I am interested in the vision for Galloway national park, in particular, and in how communities can assess whether they want it for their area. Is the vision very similar to those of the existing national parks, or is it slightly different?

Eileen Stuart: That is still to be determined—it is what the consultation will explore. The proposal that was assessed by the Scottish Government, which formed the basis for this particular proposal, came from a lot of work that was done by the Galloway National Park Association and the Galloway and Southern Ayrshire Biosphere. They worked together on what was quite an inspiring bid, which was supported by the local authorities and a range of parties that they engaged with.

The bid presented a vibrant, forward-thinking and progressive view of what a national park in Galloway could do; it was about working together with landholders, farmers and foresters to co-ordinate work at a regional scale and to identify opportunities for woodland and peatland restoration. It presented a number of quite positive things, including a view of how visitors could be managed and the area promoted, and how things could be co-ordinated at scale. That is something that a national park can bring to an area; it is able to work across boundaries with local authorities and other public bodies, and it can work in a co-ordinated way on, say, managing visitors across different sites and bringing together individuals to present farming approaches and to do things collectively and collaboratively.

The basis of what we are consulting on has come from the exploratory work that was done by the people on the ground who presented the application, but I will invite

Pete Rawcliffe to add a little bit of flavour, as he has seen a lot of that being developed, too.

Pete Rawcliffe: The vision is set out in the consultation, and the case for the national park is part of that consultation. When we provide advice to ministers, we take the consultation messages and use them to shape that advice and provide a clear vision that ministers can think about when deciding whether to proceed with designation.

Maurice Golden: I am slightly confused. Is the consultation about various iterations of the Galloway national park, including its geography and the infrastructure that it might house, or is the consultation about whether the park should or should not go ahead?

Eileen Stuart: It is absolutely about both those things. The Government has asked us to develop a proposal for what a new national park could do and then to consult on whether there is strength of opinion on the proposal going ahead. We have to do the former and present the case for what a national park could do in practice.

That is illustrated in the consultation document. We have tried to present the consultation as being very open, so there are options for a park of a number of different sizes and scales, but there is definitely also an option not to have a national park. There could be other alternatives, too. We have asked people for their views on whether there should be a national park and whether there are other effective ways of addressing the challenges in the area.

The consultation is as open as we can make it. However, there must be a proposal to consult on, so we have to present a picture of what a national park can do, based on the evidence that we have from Scotland's existing national parks.

I hope that that answers your question.

Maurice Golden: I think so, but it leads me on to what is quite a concerning aspect of this issue. How can communities make an assessment of whether they want something when that thing is not defined? For some people, it would be beneficial if the Loch Lomond and the Trossachs national park did not have the Loch Lomond Shores centre, while others might want something of that scale, because of the economic benefits. By the time that you have layered on proposals on climate change and biodiversity, there might be a number of quite compelling but competing visions for what the Galloway national park would do.

Did you consider doing the consultation in two parts, first, by gaining views, and, secondly, by showcasing those views to communities so that they could decide what might be delivered as a result? Does that make sense?

Eileen Stuart: I think that it does. We undertook extensive engagement and had more than 60 meetings with a range of different stakeholder groups, local authorities and community councils, and the response from those meetings was that people wanted to see some detail and some flesh on the bones so that they could think about what they did or did not like. That is what we have tried to present. We have tried to put enough flesh on the bones so that people can decide whether they would

support having a national park and can see how it would affect their interests or how it might respond to the things that they are passionate about.

Our feeling was that many people, clearly, have still not made up their minds. The consultation has been layered in that way so that people can make their overall views clear, but they can also say, “I like this, but I don’t like that,” or can tell us that they would support a national park only if it were a certain size or had certain powers. The consultation is structured to give us that depth of information so that we can present really good feedback to the Scottish Government and give advice about what we are hearing from communities of interest, local communities and wider stakeholders.

There are lots of elements to the consultation. There are events where we can pick up the quality insight that I hope will help us present a really clear and informed picture to ministers.

Pete Rawcliffe might want to add more.

Pete Rawcliffe: It is worth emphasising that this is an iterative process that can be stopped at any stage. It begins with quite a simple ministerial proposal that does not contain much detail beyond naming an area, and it ends with the Scottish Parliament either approving or rejecting a designation order setting out the detail of the park, its powers, its governance and its prescription for the area.

There are at least three stages of consultation between those two points. This is the first formal consultation stage; we will then advise ministers on what people have told us; and they will or will not proceed on that basis. If they decide to do so, they will develop a draft designation order, which is similarly subject to formal consultation, and will include a draft boundary and a detailed set of arrangements for its powers and governance. After that, there will be parliamentary scrutiny of the designation order as it proceeds through the Parliament, which will involve committee discussions and evidence-taking sessions, as I presume it did last time.

There are lots of opportunities to engage in that iterative process. The legislation was based on the fact that national parks could not be imposed. In other words, we cannot prescribe a blueprint for all proposed national parks; there has to be a lot of bottom-up feedback in the process.

I appreciate that that causes quite a lot of confusion about the process and what is being asked, but we are trying to be inclusive. Our advice to ministers is only advice—no decision has been made on whether to designate the park. Ministers will take that step in the light of our advice in the spring.

Maurice Golden: I have a final question. NatureScot’s website says that

“farmers and crofters do not face any additional bureaucracy within National Parks”

and that they can receive additional support. However, NFU Scotland has said that the majority of its members feel that

“existing national parks have failed to make a positive contribution to farming and crofting.”

What is your response to those concerns?

Eileen Stuart: We are mindful that farmers have expressed strong views, and we continue to engage with them. At the committee's evidence session on 30 October, Mhairi Dawson said that we have had good, open engagement with the NFUS. We continue to meet regional representatives, and we have reached out to the chair of the NFUS to ask what else we could do, because we want to ensure that farmers' views are represented and that we hear from farmers in the existing parks. The regenerative farming network is bringing together farmers from the national parks in the Cairngorms and in Northumberland for an event at the beginning of December in Creebridge.

It is important for farmers to take the time to explore what might happen, to listen to farmers elsewhere and to think through the positives as well as the potential negatives. We hear both sides of the story. The NFUS did a survey a short while ago and collected about 1,900 responses. I understand that 300 of the respondents were based in the Galloway area. We want to hear the views of farmers in Galloway and ensure that they have an opportunity to listen to farmers elsewhere and think through the issues, so that they understand the opportunities as well as the potential downsides of a national park.

We have heard about and seen opportunities, such as the farming networks in the Cairngorms and in the Loch Lomond and the Trossachs national park. They are working together by sharing information and talking about how they can make their farms more resilient and more resistant to climate change, and about how they can invest in work to support peatland restoration and woodland generation. The networks are having a positive impact, and farmers want to engage with them. They are also working with the park authorities.

There is a mixed picture, and we want to ensure that all views are properly represented and that people have the opportunity to explore and learn about the issues. We will reflect those views in our consultation report. The discussion is ongoing. As people see the detail in the consultation survey and have opportunities to discuss and explore the issues further, their views might evolve. We will feed back whatever representations are made to us as fully and as frankly as we can.

Maurice Golden: I repeat that the NFUS has said that

“existing national parks have failed to make a positive contribution to farming and crofting.”

What is different about the proposed Galloway national park that will change that, or will farmers and crofters in Galloway make the same assessment?

Eileen Stuart: We do not know what the proposed national park in Galloway would look like, because elements of it are still to be decided. It is for farmers in Galloway to express what they want. A national park would have some scope to do things such as grant powers and bring people together.

Any national park in Galloway would be tailored to the circumstances. Obviously, the farming situation in Galloway is very different from that in the existing national parks.

There is a dairy industry and a different sort of make-up; there are hill farms, as well. We are working with those farmers to discuss what a national park is and what opportunities it can provide for them and to ask what their concerns are. We will see whether their views evolve once that is explored in a bit more detail.

Pete Rawcliffe has been involved in a lot of the discussion with farmers and NFUS representatives, so he might want to add to that.

Pete Rawcliffe: I think that it has been a good discussion. We have welcomed the opportunity to talk to NFUS colleagues and other farming networks throughout Galloway.

In the consultation paper, we have looked at some of the drawbacks as well as the advantages of national parks. Most of the regulation of farming in national parks is the same as farming regulation in any part of Scotland, and it is mainly done by the Scottish Government. Funding is provided directly through the Scottish Government; the parks have no control over that. There are differences in aspects of planning, which have impacts on some farmers but not on others.

Farmers have to make up their minds on the proposal. In responding to our 2022 consultation, the NFUS reiterated that its position was no, but it noted that some of its members had said that they benefited from living and farming in existing national parks and that some could foresee opportunities from the creation of new ones.

The discussion that we are having is not about getting a yes or a no at the moment, and we do not expect to get a yes or a no until we get the NFUS response and the farming response to the consultation.

The Convener: Thank you. David Torrance will lead on the second theme, which is the drivers for designating more national parks and alternative approaches.

David Torrance (Kirkcaldy) (SNP): Good morning. The key drivers for more national parks are supporting economic growth, addressing the climate emergency and improving public services and community wellbeing. In the evidence that we took two weeks ago, people who are against the new national park in Galloway said that they did not think that the park would have any economic levers or that there would be benefits to public services. They thought that it would be detrimental to the area. Are there examples of the existing national parks supporting economic growth, addressing the climate emergency and improving public services and wellbeing?

Eileen Stuart: There is evidence from the national parks. The Cairngorms national park has done quite a lot of work with local businesses. Something like 100 businesses now use the national park brand in their promotion, and they are finding that to be beneficial. We know that the parks have been very successful in supporting visitors and tourism and in doing so in a sustainable way that reduces the impact on vulnerable sites and on communities that face problems with visitor management. There are lots of strong examples of positive action under way.

However, it is important to understand that national parks cannot do everything. They have a focus on local communities, and their strengths lie in supporting nature and climate change measures and in supporting the sustainable use of natural

resources by local communities. Areas around, for example, health and transport are not within their remit, so we must be clear—as, I hope, the consultation is—that national parks are not a panacea for all the issues that local communities have, although there are things that they can do and do well. Their convening power and the promotion and strength of the brand can be harnessed and can be quite effective for business communities.

Perhaps Pete Rawcliffe would like to add to that or explore it further.

Pete Rawcliffe: Some of the work that we are doing as part of our reporting work, along with South of Scotland Enterprise and VisitScotland, will tease out the economic impact of the proposal. In addition, the Scottish Government is undertaking preparatory work on a business and regulatory impact assessment, which will be needed alongside any decision to designate. We will collect data and evidence that is available in the Galloway region as part of the work that we, as the reporter, are doing and that the Scottish Government will be doing as part of the formal process of designation, if the proposal proceeds.

David Torrance: In evidence to the committee two weeks ago, Nick Kempe said that, under the national parks, administration, the planning system, forestry grants and agricultural grants are “exactly the same”. Is it time that we had an independent review into national parks to see whether there is anything that we could change, either for the proposed new national parks or in the existing ones?

Eileen Stuart: Sorry—for clarification, do you mean to enable people in national parks to access grants in a different way?

David Torrance: Yes, or just to change the whole planning system or the system for agricultural and forestry grants. The position is the same in every national park. Can we do something different?

Eileen Stuart: That is a good question. It is for the Government to consider the regulatory platform that exists. The regulatory and grant systems operate across the whole of Scotland, and national parks provide advice to support the guidance and enable people to access the systems more effectively. They have often provided advisory support, and they offer a way of bringing people together so that there is shared learning and, sometimes, so that applications can be made collaboratively on a larger scale.

In Loch Lomond and the Trossachs national park, there is the Great Trossachs Forest project, which operates at a landscape scale, with multiple owners coming together. The national park has been able to facilitate that approach so that, in joining together, the whole is better than the sum of its parts. In general, that is what the national parks are able to do.

The national park plans present a vision, which means that, when proposals go through the system of grants, they are already built on a clear vision and articulation of what the benefits are. That enables them to be supported with a more streamlined approach, and with a greater likelihood of success, because they are built on that fundamental vision.

David Torrance: With regard to the need for change and an independent review, should national parks have more powers to be able to enforce different things in the areas that they represent?

Pete Rawcliffe: We have asked that question quite a few times over many years. There are a lot of existing powers in the Scottish Government and in public bodies, and there has never been a convincing case for the national parks to have more powers to stop things, although I guess that some would say that that is required.

The interesting thing is that national parks have sort of been under review since 2022. NatureScot consulted and provided advice to the Government, and the Government then consulted on changes to the National Parks (Scotland) Act 2000—we will probably get on to that topic in a moment. Our advice to ministers at that time, in 2023, was that the park aims are delivered through a collective approach by the Scottish Government and that that is all brought together in the park plan. It is almost about beefing up or strengthening the park authority's ability to convene and ensuring that Government policies and local policies in the area are better aligned, rather than providing new powers per se.

David Torrance: My final question is about the management and the boards of national parks. We heard evidence that the boards should be a much broader church and should take in a lot of different areas. The boards are currently very limited in terms of the people on them. What would you say to that?

Eileen Stuart: The existing approach to identifying who the board members should be is set out in the national parks legislation. The legislation sets out that a majority have to be locally based. There is scope for local authorities to identify individuals with either a local representative role or a specialist interest, so there are opportunities in the existing system to focus on geographical representation, themes of interest or expertise. There are also Government appointees, and the Government can identify particular specialisms that it thinks would be appropriate for any national park to ensure that board members have the full range of skills.

The existing national park boards are quite large and have a wide range of expertise, including a lot of local knowledge and lived experience, so they reflect the broad range of interests that need to be represented in order to guide the national park plan and address the on-going decision making and implementation that are involved.

I think that there is scope in the existing system to ensure that the right people are around the table. That is certainly the experience as we have heard it to date.

The Convener: A little earlier, I heard you say—as others, possibly Nick Kempe, have said—that there are alternative or complementary mechanisms to the designation of a national park that might achieve a similar outcome. Can you give examples of alternative or complementary ways forward that might deliver those results?

Eileen Stuart: That is set out a little bit in the consultation document. It has been a topic of interest, and we have discussed it at the events that we have attended. The Biosphere already exists and covers a large area; it encompasses the largest area

that has been consulted on. It has been working effectively and has funding support, and it identifies opportunities and does some of the work that a national park would do. It has some challenges, in that its funding is not secure—it has to bid for funding—and it does not have the same legislative structure as national parks, so it does not command the same degree of power or influence.

There are also bodies such as South of Scotland Enterprise, which is working very effectively to address the range of social and economic issues that affect the Galloway area. Those are two examples of existing groups that could do some of the activity that a national park could do.

We are certainly open to hearing people's views on whether some form of organisation, whether it is those existing bodies or something in addition, or some beefed-up way of supporting those organisations would be an alternative that should be supported.

The Convener: The advantage of the national park designation is the authority that comes with the structure of a national park. Is that, in essence, the case?

Eileen Stuart: Yes, that is right. The national parks have a formal and statutory role, secure funding and the powers that are ultimately determined to be appropriate, so they bring with them a status, a role and a profile that the existing bodies do not currently have. However, that aspect could be explored and expanded.

The Convener: Marie McNair will ask questions on our third theme, which is the NatureScot reporter process, including local engagement.

Marie McNair (Clydebank and Milngavie) (SNP): Good morning. It is great to see the witnesses this morning, and I thank them for their time.

The Scottish Government has said that any

“new National Parks should be designated in response to local community demand.”

What is your approach to assessing local demand for the Galloway proposal? Obviously, that would cover diverse interests and the rural areas there.

Eileen Stuart: Pete Rawcliffe has been heavily involved in that work, so I will pass over to him.

Pete Rawcliffe: The consultation is now live. The reporting work is in three phases. We have done the pre-consultation work, in which we spread information and talked to a lot of people and communities, as well as stakeholder groups, across the area. We are now in the formal consultation phase, and we are trying to make the consultation as accessible as possible to a range of people in different communities across the area.

There is an online survey—both a long version and a short version. With a consultancy, we have organised a programme of open public meetings across the area, and we are continuing to meet stakeholders such as the NFUS and its members during the consultation period. We are also trying to do as much bespoke

work as we can with young people and other groups that tend not to take part in formal consultations. We are doing a lot.

We are also producing a leaflet—we are still reviewing how we do it better this time round. We distributed an information leaflet to households in the area via Royal Mail, but that coverage was a bit patchy, as we learned from some of the feedback that we got. We are planning to do something similar with the consultation leaflet, which will go out in the second half of November.

We are trying to reach as many people as possible. There might be up to 60,000 people in the area, so it is a big ask to reach as many as possible, but we think that the measures that we have put in place will guarantee a good response to the consultation and allow us to come to a view about community interest in, and desire for, the park.

Marie McNair: That is not without its challenges because of the geographical area that you have to cover.

Do you feel empowered by the Scottish Government to conclude that there is insufficient local demand? I am interested in your thoughts on that.

Eileen Stuart: Absolutely. The consultation is live and we have had 100 responses already, so it is drawing people in, which is great. Many people will reserve judgment until they have been involved in some of the discussions, so we expect engagement to build up over the consultation period. As you know, that period has been extended at the request of local MSPs in particular and in response to the feedback that we got.

The consultation is designed to be open. There will be a full and thorough analysis of the responses, which will be presented to the Government and be available for scrutiny. The Scottish Government will have access to all the material and all the responses. We are asking people to identify where they come from and to make their responses available so that we can put as much information in the public domain as possible. We want the consultation to be as transparent as possible, and we will fully and accurately follow up on, analyse and respond to what we receive.

The consultation is still open and, if the response clearly tells us that local support does not exist, that is what we will present to the Government.

Marie McNair: What were the main concerns that communities and sectors raised in the pre-consultation phase? We heard earlier about the concerns that farmers expressed. Will you expand on other responses?

Pete Rawcliffe: We have had a lot of really useful insight. The consultation paper lists about 20 things that have come up, so I will summarise them. Many of them have to do with concerns about tourism in the area and the impact that the associated traffic, transport and pollution might have on not only land managers but communities. People have asked whether the infrastructure is sufficient to cope with that.

Another stream has been about the impact on house prices. There are concerns that the park would make the issues worse in the area rather than better.

There has also been a stream about concerns that the proposal is top down, bureaucratic and imposed and that the park would be run by the Scottish Government rather than a national park authority. Lack of understanding of the process has been a concern in the responses, and the A75 has featured in a lot of the discussions.

Marie McNair: Were there any surprises in that? Obviously, that list includes a lot that you would expect, but did anything pop out as unexpected?

Pete Rawcliffe: One concern that we have heard and are following up is about the impact on healthcare facilities. There are two aspects. One is about housing for healthcare staff and one is about staff being able to do the job and travel around the area. We will pick that up with NHS Dumfries and Galloway and think about the implications of those issues and whether they are significant.

That concern did not feature in the designation of the first two national parks, but that was quite a long time ago. That is the nature of the process that we are undertaking. We are listening, responding to what people tell us and trying to take those issues forward in the consultation as part of our advice.

The Convener: Foysol Choudhury will take us on to the next section, which is on the forthcoming legislation.

Foysol Choudhury (Lothian) (Lab): Good morning. The Scottish Government proposes to make changes to the national parks legislation in a bill that is due to be introduced later this parliamentary year. Does the fact that that process is running alongside your investigation create any challenges—for example, in enabling you to tell the community what a Galloway national park might look like?

Pete Rawcliffe: The Scottish Government has made it clear that we are reporting under the current legislation, not the future legislation. That is the basis of the consultation that is proceeding. If the Government introduces changes to the National Parks (Scotland) Act 2000 as part of the natural environment bill, we will communicate that. That will complicate the communication around the messages, but we can see the opportunity that is presented by the bill to make some of the changes that have been discussed for a number of years. We understand that that is going ahead.

The Government will consider our advice alongside changes to the national parks legislation come the spring, so there will be time to think about whether the changes will have implications. At this stage, we do not know what the changes will be, so it is a hypothetical question until those changes come out into the public domain.

Foysol Choudhury: Are you worried that something might come as a surprise?

Pete Rawcliffe: No, I am not worried about that. I have other things to worry about.

Eileen Stuart: As Pete illustrated earlier, there are more stages in the process to come before the designation order is consulted on, at which point we would expect

any changes to the national parks legislation to be identified. At that stage, the consultation will evolve. If there are new powers that may affect the new proposal, they will be embedded in the further consultation, so there will be time for people to consider what is definitely on the table if things emerge from the parliamentary process.

Foyso! Choudhury: The committee has heard some views that national parks lack the power to do things differently and that the model should be strengthened before new designations are made. What are your views on that? Will the legislative proposals make a significant difference to how national parks operate?

Eileen Stuart: I would say that the proposals are an evolution, not a revolution. They are a refinement, or a means of clarifying some of the governance arrangements and the ways in which public bodies work together. They would strengthen the ability of a national park to work and to be more effective in its convening role in bringing people together and identifying the powers and the boards that will represent the Government's priorities.

As I said, the proposals are an evolution, not a radical change. In our view, they will not fundamentally change the way in which national parks are established, the work that they do or how they operate. I do not think that the proposals will make much difference to what the national parks will look like, and they are certainly not sufficient to pause the process and wait and see how things evolve. We will follow the process and see what emerges.

The Convener: One theme of the petition is the instruction of an independent review. The Scottish Government was unenthusiastic, but there was a general feeling in the committee that, after 20 years, it would not seem unreasonable to have an independent review. Some of the witnesses from whom we heard last week addressed the issue of a consultation process on two fronts. First, NatureScot has a vested interest in the outcome of the consultation, so it is therefore not truly independent in its analysis of what emerges.

Secondly, regarding the consultation itself, although people will come forward and contribute, it will elicit only the information that comes from those people who choose to participate in it, which is not necessarily always the complete picture. The merits of an independent review would be that somebody would be charged with proactively going out and asking questions, whether or not the issues that they asked about had been volunteered by a body of people, an individual or whoever, as a consequence of a consultation.

I am interested to know your perspective on the petition's ask that a review be held that would look at aspects such as farming, forestry, crofting and angling, which would give Parliament and the wider public a holistic view of the success of the development of national parks and enable them to see to what extent the existing national parks have evolved from the original conception. What is your view on that aspect of the petition?

Eileen Stuart: We are aware that that is a key part of the petition. Ultimately, it is for the Scottish Government to decide whether to undertake such a review.

There is certainly an open and transparent process for the existing national parks. There is a national park plan, parks report on their performance and they have boards to hold them to account and determine whether they are effective. As in other areas of Government, there is built-in monitoring and review, and there are opportunities for Government to reflect and give future guidance.

The new national park was proposed because the Government thinks that such parks are effective and that having an additional national park would therefore be of benefit. We must remember that the genesis of this comes from the nature and climate emergencies. We have the 29th United Nations climate change conference of the parties—COP29—at the moment, and we had COP26 in Glasgow just a few years ago, as I am sure you all remember.

Scotland has been a leader, and the Government aspires to continue to be ambitious in supporting action to address climate change and biodiversity loss. National parks are geared up to do that, as they operate at landscape scale and take action that directly addresses those two threats. That is the basis on which the Government has put forward the proposal for a new national park. It seems that the case is there and that is what the Government is working on. It is for ministers to determine whether there will be a subsequent review.

Regarding our role and our ability to be independent, we have carried out the reporter role for the two existing national parks. It is quite a complex role, which is not just about being able to run a consultation. It is necessary to have the expertise of people who understand landscape, culture and nature and can put all that together to create maps and proposals. There is quite a lot of analysis of geographical information and a lot of work behind the scenes. It is difficult to see how that could be done by commissioning an external consultant to come in and lead that work.

We have brought in extra expertise and have used independent consultancy agencies to do the engagement, so that we can ensure that it is done by experts in the field and by people who are at arm's length from the consultation process and can feed into it.

It is probably worth members knowing that there will be an independent analysis of our consultation to ensure that it has been inclusive and open and has been structured to reach out to as wide and representative a group as possible. There are lots of checks and balances in place that mean that we can be pretty confident that the consultation will be run well. I would say that, wouldn't I? However, we have the expertise and the capacity, and we are willing to respond to any new ideas that come forward.

The Convener: To pick up on that point, what will be the process that generates the independent analysis of the consultation?

Eileen Stuart: Pete, do you want to talk to that?

Pete Rawcliffe: Just as we did in relation to the Cairngorms and Loch Lomond, we will commission an independent body, which will probably be a university. That is

what we did in the case of the Cairngorms. We will ask someone to check our homework.

The Convener: Will you get an academic, arm's-length organisation to take a look and analyse that?

Pete Rawcliffe: It will be at arm's length from us. We might have to pay someone to do that.

The Convener: I have a final question, which relates to the evidence that we heard last week. There was some comment that although the new national park might be called Galloway national park, it runs into South Ayrshire and other territory, too. There was a feeling that, because that is a much more populated area where there are established concerns, it is quite distinct from the Cairngorms or wherever else. In addition, there was a concern that the thinking would be that a similar arrangement would be developed, which would really not work for that area, because it would interfere and potentially undermine quite a bit of what was there.

I think that you said earlier that the consultation is about developing a proposal that will meet those challenges. Eileen, will you confirm for the record that that is your view?

Eileen Stuart: Yes, we are very aware that the geography, the population and the issues in Galloway are quite different. Depending on where the boundary ends up being, that would affect the population density and pattern, which would obviously change things. The land management pattern, which we have talked about, of wind farms and farming communities is different, too, and that needs to be reflected.

On the population, the different nature of settlements and the different issues that come with those, we have had a lot of engagement with the local authorities—Dumfries and Galloway local authority officials, in particular, but also South Ayrshire and North Ayrshire councils. We are using the expertise and knowledge in those local authorities to guide us on what the issues are and what a national park might need to do to address them. We are doing our best to reflect what we are hearing and the different circumstances and situations that exist in the Galloway area that is being explored.

The Convener: Thank you. As there are no further questions from the committee, is there anything further that you want to add to the narrative that we have perhaps not touched on this morning?

Eileen Stuart: I think that we have covered things very well. It is really good to get your proposals, thoughts and questions, because those will help us to understand what concerns are emerging. We are very happy with the discussion, and we would be more than happy to come back or to explore any of these things in more detail as the process evolves.

The Convener: Thank you for that and for the evidence that you have given us this morning, which has helped to build up our profile of the issue.

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We will continue our consideration of the petition at our next meeting on 27 November, when we will hear from the Cabinet Secretary for Rural Affairs, Land Reform and Islands.

Are members content to reflect on the evidence that we have heard in our private session later?

Members *indicated agreement.*

The Convener: In that case, I suspend the meeting to allow the witnesses and others leave.