

Citizen Participation and Public Petitions Committee
Wednesday 22 January 2025
1st Meeting, 2025 (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 last considered this petition at its meeting on 27 November 2024.](#) At that meeting, the Committee heard evidence from the Cabinet Secretary for Rural Affairs, Land Reform and Islands, and Scottish Government officials.
2. 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**.
3. The Committee has received new written submissions from the National Farmers' Union Scotland, and Finlay Carson MSP, which are set out in **Annexe C**.
4. [Written submissions received prior to the Committee's last consideration can be found on the petition's webpage.](#)
5. [Further background information about this petition can be found in the SPICe briefing](#) for this petition.
6. [The Scottish Government gave its initial response to the petition on 22 May 2024.](#)
7. Every petition collects signatures while it remains under consideration. At the time of writing, 3,692 signatures have been received on this petition.

Action

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

Clerks to the Committee
January 2025

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 27 November 2024

The Convener: Agenda item 2 is consideration of continued petitions. Our first petition is PE2089, lodged by Deborah Carmichael on behalf of 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, instruct an independent review on the operation of the current national parks, including 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 said independent review.

At our previous meetings, we heard from a variety of organisations in favour of and opposed to the creation of a new national park. We have also heard from NatureScot, which is currently undertaking its role as reporter for the consultation on the proposed new national park.

Today, we are joined by Mairi Gougeon, who is the Cabinet Secretary for Rural Affairs, Land Reform and the Islands, Brittany Brown, who is policy lead for new national parks, and Lisa McCann, who is head of biodiversity, at the Scottish Government. Good morning and welcome to you.

I invite the cabinet secretary to say a few words—this is an exception—and then we will move to questions.

The Cabinet Secretary for Rural Affairs, Land Reform and Islands (Mairi Gougeon): Thank you very much, convener, and thank you to the committee members, too. I appreciate the opportunity to speak to you this morning.

I know that members of the committee are aware that the Scottish Government has introduced a proposal to designate a new national park, the proposed location for which is in the south-west of Scotland.

I believe that national parks play an important role in stimulating economic growth and supporting their local communities, as well as tackling the climate and nature crises that we face. The public opinion surveys that we have carried out show strong support for new national parks and there was cross-party support for them when we had the debate about them in the Parliament.

Earlier this year, following the appraisal of the five nominations that we received against a set of published criteria, we decided to formally take forward the proposal from Galloway to the next stage of the process. NatureScot was appointed as a reporter to investigate that proposal and to lead a statutory public consultation on it. That consultation started on 7 November and will continue for 14 weeks. We extended the consultation period by two weeks to take account of the festive period.

As well as the consultation surveys, NatureScot is organising a wide range of consultation events across the area that will be facilitated by an independent organisation and reported on by facilitators. Additionally, a series of drop-in surgeries

and some separate consultation meetings and activities for businesses, young people and equality groups will take place.

As I have made clear, we are keen that everyone with an interest engages in that consultation and makes their views known. I also want to be clear that nothing has been decided—it is very much still a proposal and everyone's views will be listened to and taken into account before any further decisions are taken.

NatureScot will report on the findings of the consultation and those findings will then inform and shape the advice that it provides to the Scottish Government. Then, we will consider that advice and the consultation outcome carefully before we look to take any further decisions. I realise that there is significant public interest in the proposal and that there is both support for and opposition to it. That is why I am grateful to the committee for its consideration of the petition.

I am happy to take any questions that members might have.

The Convener: We do not have a national park in Eastwood, so I do not come to this with any particular axe to grind. I always say that what motivates us here is not any party-political position, but is the petition—our responsibility is to try to articulate and take forward the interests of the petitioner as best we can.

I will kick off. We already have two national parks, so what was it that caused the Government to say, “We will now develop another national park?” What was the motivating factor at that point?

Mairi Gougeon: As you mentioned, we have the Cairngorms national park and the Loch Lomond and the Trossachs national park, and it is over 20 years since those parks were created. As I outlined in my opening remarks, national parks bring a number of different benefits in relation to the economy and what they can do for communities in an area, as well as for climate and nature. National parks are recognised for those reasons and for the landscapes that are in those areas. I should say that I have a fraction of a national park in my constituency, just towards the very edge, although it does not cover any massive population centres by any means.

I know that there have been calls, for a long time, on the Government to establish a new national park. When I was first appointed as a minister in 2018, I met campaign groups—largely from Galloway and the Borders—that were keen to see a national park developed in their areas. That is why we eventually came to where we are now and why we have reached this stage in the process.

Those campaigns have been on-going for a long time and consultations, surveys and engagement work were also undertaken during that period. A new national park became a programme for government commitment, and in 2022, we debated that in the Scottish Parliament, where there was cross-party support to continue with the proposal and agreement that a new national park should be created. Ultimately, that has led us to the point that we have reached today.

The Convener: What has puzzled us and is the nub of the evidence that we have heard to date is the distinction between a consultation and an independent review. Twenty years after the creation of national parks, it seems quite a sensible

proposition to have a proper independent review that measures their success against the benchmarks that were originally established, considers the lessons that might have been learned from that, and how those lessons might inform how any future national park might be developed.

There is a degree of suspicion about the consultation route because NatureScot, which is leading the consultation, is also the instigator of the national park and therefore, the independence of the analysis that it brings to its consultation gives people the sense of it being poacher turned gamekeeper.

Moreover, there were 300 responses to the consultation from an area where 300,000 people could potentially respond. It is difficult to be certain whether a series of consultations or engagement exercises would genuinely articulate the information that would lead to lessons being learned, whereas an independent interrogator that looks at those things and proactively asks questions might be more likely to elicit that.

We have been puzzled because, it does not seem unreasonable to look independently—as we would in any ordinary circumstance—at what the success of a national policy such as a national park has been before, two decades on, we start on the third one. Based on the evidence that we have heard from others so far, the Government has seemed quite intractable. What has been the Government's objection to using such a review as a point of reference in shaping its approach to the issue?

Mairi Gougeon: There are quite a few points in that, which I will try to address. The Government's decision was not based on consultations alone; there have been several detailed pieces of work. The general consultation found that about 89 per cent of people agreed that there should be a national park.

I appreciate the concerns that there can be around a national park, but that is the fundamental reason why, in respect of the proposal for a park in Galloway, we are asking people whether they want a national park in their area. It is important to get that information directly from people who live in the proposed area to hear what they think about it.

For a number of different reasons, taking forward an independent review is not something that we are considering. National park authorities are accountable to their boards for their performance. Those boards, which are accountable to the Scottish Government, look at the organisations' finances and how they are operating. All of that is open to parliamentary scrutiny, if it is felt that it is required. If we were to identify any issues through those processes, we would be able to look at them.

At no point during the debate in 2022 that I mentioned was there any suggestion, from any party, that there should be an independent review of national parks. In fact, members from every party across the chamber were extolling the virtues of national parks. If anything, some parties were calling for the timescale for establishing a new one to be shortened; others said that we should designate not just one additional park but two, three or four. As was evident from that debate, there was a very strong

feeling that the Scottish Government needed to get on and deliver the new park, because our national parks provide benefits to Scotland.

The work on that is important. I mentioned the various surveys and processes that have been undertaken. It has not been a quick process, by any means, to reach a point at which we could introduce the proposal. We have got to this stage by building on the consultation that was undertaken and, on the back of that, seeking detailed advice from NatureScot. In that context, I do not think that an independent review is necessary.

The Convener: Please feel free to bring in your colleagues whenever it would be appropriate for them to join in.

As members of the Scottish Parliament, we regularly hear of consultation fatigue and suspicion from constituents. It seems that there is a consultation for everything—you have only gone to Marks and Spencer to buy something but you can hardly get home before you are asked to fill out a consultation on what your experience was like when you were buying it. People are exhausted with all of it. There is a growing suspicion in many people's minds—which, as an MSP, you must recognise—that consultations are now just part of the fabric of everything that gets done, and that they are there to serve the interests of the original proposal, rather than genuinely to allow people the opportunity to contribute their own thoughts if they are counter to what has been proposed.

I participated in a consultation, in which I was allowed only 100 characters to express what I thought. I do not suggest that that is happening here, but do you understand why we have had so many responses from people saying that the consultation itself is—potentially, in the minds of some people—a flawed mechanism, particularly when it is being conducted by the people who are promoting the idea in the first place?

Mairi Gougeon: I understand the point that you are making about consultations in general. I know about that from my own portfolio. However, consultations are critical to the decision-making process, and we have a duty to do them. I appreciate your point about consultation fatigue.

In relation to the work that NatureScot is undertaking at the moment, I want to stress something that I mentioned in my opening comments, which is that I am not coming at the consultation from a particular angle and that I genuinely want to hear what people in the south of Scotland think about the proposal. They are the ones who live in the area, so it is important that they want to have the park there.

There are other options in the consultation, too, in which, if a park is not what people want for their area, they can set out what they would like to see instead. The information that will come from the report will be critical. I really want to get the message across that no decision has been made and that we really are listening to what people have to say. I encourage people to take part in the process, which needs to be as open as possible, as can be seen from the number of events that NatureScot is holding as part of the consultation process, and the engagements that it has planned.

On the point about NatureScot being the reporter, it was appointed because it has the expertise in the areas set out in the National Parks (Scotland) Act 2000. NatureScot did the work for the designation of the initial national parks, and it is the most appropriate body to take on this work, as set out in the legislation. It is important to remember that the work that NatureScot is doing, and the reporting process, will be independently evaluated before ministers consider it further.

I hope that as many people as possible will engage in the consultation. It is an open process, and we really want to hear what people think.

David Torrance (Kirkcaldy) (SNP): Good morning to the cabinet secretary and our witnesses.

The committee has heard different views on how national parks impact upon communities and rural livelihoods. Cabinet secretary, what evidence is there that the existing national parks are meeting their statutory purpose to promote sustainable economic and social development in their areas?

Mairi Gougeon: There is quite a lot of evidence available on what national parks deliver for their areas, especially when we look at the economies of those areas. I will focus on tourism in each of the national parks, as an example of one aspect of that. In the Cairngorms national park, nearly 5,500 people are employed in the tourism industry. From the latest figures that we have seen, that generates about £420 million for the region's economy. In the Loch Lomond and the Trossachs national park, I think that the figures show a value to the economy of more than £500 million and that more than 6,000 people are employed in the tourist industry. What national parks can bring to the economy is really important.

However, national parks are not just about tourism; they are also about supporting communities. For example, the Loch Lomond and the Trossachs national park has run some community development projects. It helped to fund and take forward town centre regeneration work in both Callander and Killin and it is also working on various transport projects in its area. So, national parks bring a lot of benefits.

A key programme in the Cairngorms national park that is worth mentioning today is the Cairngorms 2030 programme, which brings together around 70 different organisations. The programme has £40 million of funding attached to it, about £10 million of which has come from the National Lottery Heritage Fund.

Cairngorms 2030 looks to address a number of different issues, such as improving the health and wellbeing of people living in the area. One of the projects that that programme has delivered is an outdoor dementia centre. The programme is also considering what can be done to provide better connectivity, whether that is for walking, wheelchair access or cycling. There are a number of different climate and nature initiatives such as the restoration of peatlands and woodlands and also flood resilience.

I am only touching on some of the projects that show the benefits that national parks provide to local economies.

David Torrance: On the flip side, in the other evidence that we have taken, campaigners have said that national parks are not getting the basics right in things such as access to affordable housing and social housing and the pressure on infrastructure—even in respect of something as simple as litter bins. How does the Government see the involvement of national parks in such issues?

Mairi Gougeon: You mentioned several different issues. Of course, tourism and visitors bring additional pressures, as we saw in particular throughout Covid. The national parks are well equipped to deal with that through their ranger services and also through visitor infrastructure. I know that the Cairngorms national park has been looking at how it can better balance its visitor numbers across the off-peak seasons. It has seen some success in that and has increased the number of visitors in off-peak times by around 18 per cent.

There has also been wider infrastructure investment. Your question touched on housing. National parks cannot fix all the problems in a national park area; it is not their role to do that and they do not have the powers to do that. However, they have a strong part to play when it comes to collaboration and bringing together other bodies to try to address some of the issues that exist in the national park areas.

Each park has to bring forward a partnership plan. For both of the parks, ensuring the delivery of more affordable housing has been identified as a key priority. The amount of affordable housing that has been delivered through those plans in the Loch Lomond and Trossachs national park area is well above what even the Government asks for. We would expect the level of affordable housing to be about 25 per cent in national park areas, but I think that that figure is about 65 per cent in the Loch Lomond and Trossachs national park area.

Through their local development plans, national parks are working with local authorities to ensure that they are addressing such issues where there are known problems. As I said, the national parks cannot fix everything, but they have a strong leadership role to play in trying to address some of those issues.

David Torrance: The Scottish Government says that new national parks are being pursued to help tackle the climate and nature crises. However, the committee has heard different views about the extent to which national parks have the powers to make a big difference in those areas. Can you describe what you see as their role, and can you give some examples of how national parks are tackling those twin crises?

Mairi Gougeon: Absolutely. I will touch on the Cairngorms Connect programme, which is part of the work that the Cairngorms national park is doing. Our national parks can be leaders by working at the landscape scale in trying to make an impact. The Connect programme is the UK's largest habitat restoration project, and it is backed by about £4 million of investment. Sixty members of staff are employed through that work, which concerns how the national park can deliver on planting more woodland and on peatland restoration.

Similar projects are being pursued in the Loch Lomond and the Trossachs park through its future nature programme, and the national park directly provides grants to communities for enhancing biodiversity.

The national parks work with farmers in their areas: there are schemes that work directly with farmers to do everything that we would all want to see—ensuring food production, ensuring that farming works for climate and nature and helping farming businesses to become more resilient. The Cairngorms national park is pursuing a future farming pilot to do exactly that.

Different aspects and elements of funding are available to farms within the national parks that are not available elsewhere. Both national parks have a strong leadership role in tackling the climate and nature crises. I believe that they are taking that action at park level to address the climate and nature crises that we know we are in. The work that I have mentioned is just a fraction of what is going on in both areas.

Maurice Golden (North East Scotland) (Con): The Scottish Government has said that any

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

What level of local buy-in do you consider necessary for a designation in order to progress?

Mairi Gougeon: That is a difficult question to answer, but I would return to the points that I made earlier. We need people to take part in the consultation, and I hope that as many people as possible participate in it, because we really want to hear people’s views. One of the key things that we asked the reporter to ascertain initially was whether people wanted a national park in their area, first and foremost, before then considering other proposals. It is really important that people take part in that process. We would consider that as part of the overall review. No decisions have been taken, however; we want to hear what people in the area think before deciding on any potential next steps.

Maurice Golden: There is a genuine difficulty for local communities in Galloway regarding the difference between the principle and the blueprint—you made a point about that. In Angus, if you were to ask the people of Forfar whether they want a train line from Forfar to Dundee, most of them would say yes. However, when we consider the costs of it, the elevation and the alternatives, people might come to a different point of view.

NatureScot has said:

“We do not know what the proposed national park in Galloway would look like”

How, then, is it possible for local communities to make a decision on whether they want one?

Mairi Gougeon: I appreciate that point, and I appreciate the challenges that exist. That is where the initial engagement that NatureScot undertook was really important, as it informed proposals that are now in the consultation, where a few alternatives have been put forward for people.

I completely understand the frustration in that regard. I have met representatives of various groups and bodies and different stakeholders to discuss the proposals that have been put forward. Those proposals can be completely open to interpretation in some ways, and I understand that criticism that people do not know what they are voting for. At the same time, however, it is good to get the sense that, if people in Galloway want something, it is up to them to build it. It is not necessarily a case—in fact, it is not a case—of replicating the existing two national parks, which are different from each other. A national park in Galloway would be a very different proposition, by its very nature. It is ultimately up to people to design what it could look like.

The consultation that we have put forward provides different options for people to respond to, as well as asking for other ideas as to what a proposal could look like. That could include a different boundary or, if people do not want a national park, suggestions for how else we could work to improve the economy in the south of Scotland, in addition to addressing various other issues.

There is definitely now more information in the consultation, and there are different options for people to address and consider when they are responding to it.

Maurice Golden: Thank you for that. From the evidence that we have received, it appears that part of the issue is that there are no discernible benefits relating specifically to a national park. That applies even to some of the aspects that you have mentioned, such as dementia centres—Kirrie Connections, for example, is not in a national park area. There are also bike trails all over Scotland that are not the direct result of a national park. What, in your view, are the benefits that can be gleaned only via a national park?

Mairi Gougeon: I am probably going over some of the points that I have made previously. You are absolutely right—I have visited Kirrie Connections and I know that it is a fantastic centre, and we did not need a national park for that to happen.

However, where national parks have had a leadership role in being able to work at a landscape scale, that has been really important. For some of the projects that I have touched on today, such as Cairngorms Connect or the Cairngorms 2030 programme, it is about all the extra funding that they have been able to lever in on the back of that.

We can see, in the Cairngorms 2030 programme, the collaboration between 70 different organisations in the area. The ability to bring all those organisations together to work to improve the overall connectivity of the area, as well as general health and wellbeing and—as I said—the peatland and woodland on a wider scale, is really important. It would not have been the case if the parks had not been in existence or had not been able to work on that scale or with that level of investment. That is where I see the additionality that parks can bring.

Maurice Golden: Would you envisage a Galloway national park as having some of the facets that the other national parks have, such as Aviemore and Loch Lomond Shores?

Mairi Gougeon: If a national park were to proceed in Galloway, I think that it would be a very different proposition. There are a number of industries that are key to Galloway, such as farming and forestry. Given the importance of those sectors to the area, a park would have to represent that, so, again, it would be a very different proposition.

It is not for me to set out here today what a park should look like and what it has to cover. Ultimately, it is for the people to decide whether they want a national park, and what the shape of that should be and what it should look like.

Maurice Golden: NFU Scotland has raised concerns about existing national parks, and we have so far been unable to get any evidence to assuage those concerns. Is there anything that you could provide to NFUS in that respect today?

Mairi Gougeon: I am aware of those concerns—again, I have met with various stakeholders in relation to the proposals for a new national park.

There are differences in some areas. For example, agricultural policy inside and outside the national parks is different. To come back to one of my previous responses, I talked about the ability of farms in the park areas to access new programmes and, potentially, other avenues of funding, which is important.

There are some differences in relation to permitted development rights—for example, the size of sheds that people could have within and outwith a park area. I understand that there are some concerns about that. However, in general, the overall policy is not different inside and outside the park. The funding mechanisms are exactly the same in that regard.

Again, I am in discussions with stakeholders and I am trying to listen to and address those concerns as far as possible. I recognise that farming is key to Galloway—I have visited a number of farmers in the area, and that is what the area is about. The dairy industry there is critical, and we would not want that to change.

It all comes back to the fact that people need to be able to have their say in the consultation process and make their views known about what they want to see.

Fergus Ewing (Inverness and Nairn) (SNP): Good morning, cabinet secretary.

I am perhaps unique in at least one sense, in that I have been a resident in both national parks, and I have represented a large chunk of Cairngorms national park since it was established in 2003, and before that, the Cairngorm Partnership.

In their submission of 3 September, the petitioners said:

“a recent poll by a local community forum”—

the Aviemore and Spey valley community issues forum—

“asked its members if the Cairngorm National Park had performed well and 92 per cent said”

that it had not. A paltry 3 per cent said that it had. That is a North Korean-type majority.

The petitioners go on to make the point that

“surely a curious minister about to launch a third national park would want to find out why there was such overwhelming concern.”

What would the cabinet secretary say to them?

Mairi Gougeon: If there are particular issues, I want to dig more into them to find out what is behind them and what the concerns of the people who responded to that poll are. I do not have the details of the poll, know how it was undertaken or know whether any particular views were expressed in it.

What is important is the work that park authorities undertake in developing their priorities and how they move forward. I believe that the Cairngorms National Park Authority is undertaking work across the park area to survey residents and gauge the opinions of people who live in the area as to whether the national park has a positive impact. That will be an important piece of work and I am keen to see the results of it.

Fergus Ewing: Mr Golden asked about how support in Galloway would be gauged. Indeed, I asked Francesca Osowska and Peter Rawcliffe that in a conference call that I had with them a few weeks back. Perhaps that is for later on, because NatureScot is going to meetings in Galloway and people are asking what the boundaries would be, what the national park authority’s powers would be, who would be on the board and what the authority would do but there are no answers to any of those questions. It is a bit of a pig in a poke at the moment.

If the idea of a new national park is taken forward, surely the only real way to measure opinion would be to ask the people who are resident within its proposed boundaries in a local referendum. I thought that our party was in favour of referenda.

Mairi Gougeon: We are in the middle of the consultation process at the moment. It is important that we see that through. I am more in favour of that process because we ask people whether they want a national park within their area but we also get wider, qualitative information out of that.

I understand what you say about the boundaries, but boundaries are proposed in the consultation to get people thinking about what a park could look like. However, it is also open to people to suggest what they would like to see in their area otherwise. Therefore, to pose the question in a binary way would not be helpful. It is important to be able to conduct the consultation in the way that NatureScot is doing so that we get the quality of information that it is getting and pick up a wide variety of opinion in considering all those matters.

Fergus Ewing: Are you ruling out a local referendum, cabinet secretary?

Mairi Gougeon: Yes.

Fergus Ewing: In his evidence, Ian McKinnon—I should say that I have known him for 20 years—said:

“If we cannot provide the basics of litter collection, toilets and parking—and we are not doing that in our existing national parks—we should not be considering creating another one in the future.”

Is he not right?

Mairi Gougeon: I read that evidence. I come back to some of the points that I have made. The national park authorities are in a better place to address some of those issues.

I cannot speak to individual instances of what Mr McKinnon experienced, but let us look at some of the investment. The Cairngorms National Park Authority is able to invest in visitor management and is doing that. Both national park authorities employ seasonal and full-time rangers to manage some of those pressures. The Cairngorms National Park Authority has invested £200,000 to deliver infrastructure improvements. That relates to the infrastructure that you are talking about, including public toilets and motor home waste facilities, as well as wider investments. The Loch Lomond and Trossachs National Park Authority has done exactly the same to manage those pressures.

That is not to say that there are no problems, but the parks are in a good place to address some of those issues and are investing in trying to do that.

Fergus Ewing: As a resident and representative of a large part of the Cairngorms national park, I beg to differ about that, and tend to agree with the 92 per cent of my constituents who said that the park is not performing well. I say that with some sadness, because it is not what one would wish.

However, to go back—and this is the last area that I want to address, convener—the beef of the petition is in point two, in which the petitioners call on the Scottish Government to

“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.”

The parks have been in existence for 21 years. There has been no independent analysis of their performance. Yes, there are reports, and there are board members. However—and the petitioners make this point—board members are not allowed to express public criticism of the national park. One wonders what the point of board members is if they are gagged in that way—and I know that they are, because I know many of them and have watched that in operation, sadly.

The central point is, why are we creating another body, when there has been no proper, thorough and entirely independent analysis of how the two existing bodies have functioned over 21 years? When I say “independent analysis”, I do not mean, as Peter Rawcliffe suggested in his evidence to the committee, that some university should be appointed to carry out an independent review of the work that NatureScot does. I wonder which university will be picked for that and whether it will be one that will produce answers that are congenial to NatureScot, which, plainly, wants another national park and is not impartial in any way.

Surely the case for independent analysis is unassailable. With respect, the answers that have been given so far by you and NatureScot have been completely inadequate. The so-called benefits that you alluded to—the economic benefits—have been created by businesses and people in the national parks, not by the national parks themselves. As you said, a national park has very limited powers; therefore, the idea that hundreds of millions of pounds have accrued from the oeuvre, the efforts, the labour, and the input of the national park is for the birds.

The Scottish National Party did not include the new national park in its manifesto. It is a Bute House agreement legacy promise, and the Bute house agreement has been torn up. Why is the Scottish Government going ahead with this when there are so many so many more important things to do? If you are intent on going ahead with it, surely there must be a properly independent analysis—which is the central ask of the petitioners.

Mairi Gougeon: There is quite a lot in that question, so I will address it as best I can. I have already outlined why we have reached our position. You are absolutely right—the commitment was made in the Bute house agreement; it then formed part of what we said we would take forward in the programme for government. There was an agreed process, which we are working our way through.

Again, the consultation and the reporting stage are critical to that. We are under no obligation to proceed, and the outcome of that will be important before we determine the next steps. However, in thinking of those next steps and the work that has been undertaken by various groups in different parts of Scotland, it is important that we have reached this stage and that we have continued, given that the process was widely agreed.

Again, I come back to that mandate from the Parliament and all political parties within it. Throughout the course of the debate, no concerns were expressed by any party about how national parks were operating or the benefits that they brought. In fact, it was quite the opposite—the Government was being told to get on, do it now, designate more and do it faster.

It is important that we have taken the time to do what we have done and to carry out the work in the way that we have done it. We are now at this stage in the process, and I will not stop the process in the middle of consultation. We need to see that through before we determine the next steps. In addition, I am not going to stop it in order to undertake an independent evaluation of national parks.

There are the processes that I outlined earlier, as well as the scrutiny and the accountability mechanisms involved, and, indeed, the Parliament could undertake work on the matter if it felt that it was necessary. However, now that we are at this particular stage of the process, I want us to see through the consultation before setting out next steps.

Foysoyl Choudhury (Lothian) (Lab): Good morning. The Scottish Government has set out its intention to make changes to national park legislation in the proposed natural environment bill. Why is national parks legislation being reviewed, and will the proposed change make any significant difference to how national parks operate?

Mairi Gougeon: You have raised an important point about the work that is currently under way. You are absolutely right, and I think that, ultimately, the proposals for modernising the legislation on national parks came about as a result of a number of pieces of work. I have already mentioned some of the engagement work that had been undertaken and various consultations that had been carried out, and there is also the advice on national parks that NatureScot provided to ministers last year. On that basis of all that, we consulted on proposals that could be brought forward as part of the natural environment bill, which is in the programme for government and which we have committed to introducing to the Parliament this year.

Ultimately, this is about modernisation and recognising the national parks' role in tackling the climate and nature challenges that we face and looking at their purpose and aims, the role of public bodies in that respect, the use of enforcement powers in the parks and their governance. It is not possible for me to say exactly when that legislation will be laid, but that is the reason for bringing forward the proposals. We published the results of the consultation only just recently—in the past couple of weeks, actually—and we are still considering the responses to determine what will be in any legislation that is brought forward.

Foyso Choudhury: Will the Parliament be able to consider any legislative changes before or alongside a designation order so that it can scrutinise coherence across the proposals?

Mairi Gougeon: We are in a bit of a difficult situation in that respect at the moment, but we also want to provide as much clarity as we can. Obviously, it is hard for me to set that out, and, as I am sure you will appreciate, I cannot say when the legislation will be introduced to Parliament. Moreover, I have to see through the consultation process before any next steps are considered. However, I hope to provide that clarity as soon as we possibly can. I should say, though, that it does not fundamentally alter where we are with regard to the proposition that is being considered for the south of Scotland.

Foyso Choudhury: Lastly, NatureScot recommended that the Scottish Government produce a draft policy statement on national parks consultation alongside legislative proposals. Does the Scottish Government plan to double up and consult on a national policy statement on national parks?

Mairi Gougeon: That comes back to the advice that NatureScot provided to us last year, which I have just referred to. A few recommendations came on the back of that, one of which was the national policy statement that you have asked about. However, it is not an area that we are considering consulting on or bringing forward, because when we considered the advice and the recommendations, our feeling was that it was all set out in the purposes and aims of the national parks. Therefore, bringing such a statement forward is not part of our plans at the moment.

The Convener: I wonder whether I can come back on that, cabinet secretary. In your evidence, you have made various references to the debate that took place in the chamber. That will include what I said, too. I suppose that I just went along with the hype; the background noise that the debate was being held against was that these

things had been a wonderful, magnificent achievement and that everybody was absolutely aglow with their success. As such, it never occurred to me to think that there might be an alternative view. How very naive of me, you might say; nonetheless, that was the kind of atmosphere that was attendant on the debate.

Therefore, I have been quite surprised by how, in the evidence that we have taken, people are talking about the issue as being divisive in communities and becoming really quite an ugly stain when it comes to engagement between different organisations and people within the proposed landscape. As a result, although you can point to debates in the chamber, I do not know that they should stand as the benchmark against which all subsequent decision making must stand. Does it not alarm you that such a culture seems to be growing within the proposed landscape that you are operating in? Given that it is, how do you address it?

Mairi Gougeon: I absolutely appreciate the point. I have, as I have outlined, had various engagements with various stakeholders, and I have also met elected members for the area to hear their concerns.

You are absolutely right. It has been concerning to hear about the division that has been caused, because it is not something that we want to see in our communities. One key thing for me that I hope that I have been able to outline today and, indeed, which I have been trying to get across to people more generally, relates to the concern that this is a done deal and that, because the Government had a commitment to establishing a park, it would, regardless of what might happen, be taking place anyway. That is by no means the case. As I have said, I want to hear what people in the area think before I determine any next steps.

I cannot get carried away with hype—I have to base this on the best available information. I mentioned that debate, because the overall consensus in the room was that this was a proposal that we needed to proceed with. However, I am not just doing this on the back of a parliamentary debate; extensive work and engagement have taken place over the past few years to bring the proposal forward and to reach the stage that we are at today. We cannot forget about all the work that has been done, the extensive advice that has been taken and the various iterations of consultation. If a proposal were to proceed beyond this point, there would have to be more phases of such work; there would have to be another consultation as well as parliamentary consideration of the proposal.

Again, this is not a done deal. We are at this stage in the process just now, because we want to hear what people think. I just want to get across this point: this is still open, and we want to hear people's views as to whether this is something that they want in their area. If they do not, it will not happen. However, we need to hear those views and what people in the south of Scotland think.

The Convener: What are the trigger mechanisms here? According to the consultation, the core funding provided by the Scottish Government for national parks was £20.9 million, and the core budget of the Galloway national park might not be as large as that required by the other two parks. However, given the context of finite resources, what will be the trigger mechanism that will determine for you

whether a national park is the best course of action, compared with alternative ways or routes by which, as Maurice Golden and others have suggested, some of the benefits that it might generate could be achieved?

Mairi Gougeon: It is important to recognise that the Galloway and Southern Ayrshire Biosphere is in the area, too, and I have heard from other stakeholders about the roles of other organisations and how that sort of thing can be used. That information is really important, as is hearing what people think about everything else that is happening in their area at the moment.

You are absolutely right to touch on the issue of the budget, as it is an important consideration that we will have to factor into our decision making. As you have said, resources are finite at the moment. We do not have a specific budget allocation for the national park, because we do not know what that proposition might look like; its composition could be entirely different from that of the current national parks. If a proposal were to proceed, it would have to do so in as efficient and streamlined a way as possible, recognising the financial situation that we are in.

Again, I cannot outline today what the trigger mechanism would be. All I can say is that they are all going to be important factors in our overall decision making.

The Convener: I have a final question before I ask for follow-up questions from colleagues. This is called the Galloway national park, but as we have heard from people in South Ayrshire, it will go a bit wider than that. Are you satisfied that the scope of the national park is fully appreciated by all communities?

Mairi Gougeon: It is really important that everybody in communities knows that. I have heard that concern directly, and I know that NatureScot has been carrying out engagement work to ensure that everyone in every part of the overall proposed area is aware of the proposals.

There was a specific issue about some initial information not being made available to everyone, but I believe that that has now been resolved. There will be further opportunities in that respect, and leaflets will be sent out to everybody in the area, in appreciation of the fact that not everybody is online and that people need to have that information to hand. We want to make sure that NatureScot is communicating as widely as possible and ensuring that people are aware of the proposals and know how they can take part in the consultation.

The Convener: I see that colleagues have no follow-up questions. Do you have anything further to add, cabinet secretary?

Mairi Gougeon: No, thank you, convener. I think that we have covered everything.

The Convener: In that case, thank you very much for your evidence. I am sure that your colleagues were providing moral support to you this morning, but thank you all very much.

If members are content to consider this evidence later, we will have a short suspension just now.

Annexe C: Written submissions

National Farmers' Union Scotland written submission, 3 December 2024

PE2089/F: Stop More National Parks in Scotland

I write on behalf of NFU Scotland to highlight inaccurate information that was provided to the Citizen Participation and Public Petitions Committee evidence session on Wednesday 13 November. The Committee was taking evidence on PE2089: Stop More National Parks in Scotland from Eileen Stewart, Deputy Director of Nature and Climate Change at NatureScot.

During this session, at 09:47, in response to a question from Maurice Golden about our public survey, Eileen Stewart stated that "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".

This is factually incorrect. The survey NFUS undertook was a public survey that was open from February-September 2024 and received almost 2,000 responses. In this survey, the question on the connection to Galloway allowed a person to select as many boxes as were applicable to an individual. Of the total number of people who responded:

- 640 selected Farmer in Galloway.
- 1,140 selected Galloway Resident.
- 354 selected Own/Manage a business in Galloway
- 214 selected Other.
- 56 skipped the question.

As you can see, the statistic used by Ms Stewart is completely inaccurate, as well as being misleading. This response has the potential to undermine our claims that farmers, and the general public in Galloway, are opposed to this proposal. The results from this survey, as our Regional Manager for Dumfries & Galloway provided to the Committee on Wednesday 30 October, were that 73% of respondents opposed the proposals.

Finlay Carson MSP written submission, 13 January 2025

PE2089/G: Stop More National Parks in Scotland

Finlay would like to attend the Committee, however, he is convening the Rural Affairs and Islands Committee where the Cabinet Secretary is due to attend, which might make it difficult to join at an appropriate time.

He would, however, like to share a letter that he sent to the Cabinet Secretary today, in which he outlines his serious concerns surrounding the consultation process.

If this could be relayed to the members of the Citizens Participation and Public Petitions Committee, Finlay would be most appreciative.

'Dear Cabinet Secretary, Mairi,

Happy New Year to you!

A high volume of correspondence is always a reliable indicator of how controversial a policy is playing out over a range of constituents, businesses and stakeholders. The proposal for parts of Galloway to be considered for designated as a National Park is one of these policies. While there is a debate around the pros and cons of national park status, critically a significant level of concern being voiced related to the designation process and associated consultation.

The whole debate is becoming increasingly divisive and toxic. Opponents of designation have staged protests, including a notable demonstration outside the council headquarters in Dumfries, reflecting community concerns about the potential impacts of a national park while many have contacted me in support, but what concerns me and my constituents the most, is the current consultation process, which is attracting several significant and serious challenges and criticism of the approach taken.

Constituents rightly question whether it can ever adequately represent the views of local stakeholders, with many worried that the consultation may be biased towards those in favour of the park, potentially overlooking the voices of those who are opposed. These concerns include NatureScot's appointment as reporter and subsequent handling of the consultation process with many arguing that the consultation is biased, particularly in the way public events and questionnaires are conducted. The No Galloway National Park (NGNP) campaign has been vocal about the perceived partiality, highlighting that the materials presented are heavily skewed in favour of establishing the park and in some instances even point constituents toward the pro-park campaign website. Another significant issue is the involvement of schools in the consultation process. I share the concern that presenting pro-park materials to students without offering balanced perspectives is inappropriate.

Not only were the initial publication of details of public meetings, the venues, dates, and times concerning, there are a number of valid and serious issues around the whole consultation approach, if it indeed can be validly referred to as a consultation given the lack of background information. I am concerned that this part of the process has been labelled 'the consultation period.' Currently, there is little for anyone to comment on. It would have been more appropriate if it had been termed a 'call for views.' While there has been an extension to the consultation timetable, there appears to be no satisfactory reason for the short overall timescale, which can only have been set with a view to concluding the process within this parliamentary term. This is not an acceptable reason if there is a desire to have a satisfactory and fit for purpose process.

The public were told that any new Galloway National Park would be completely different from any other existing National Park, then given no indication of how it might differ or indeed what a different kind of park might benefit the area. Galloway has a level of intensive farming, forestry, industrial wind farms, and population

density completely different from any other National Park, so some attempt should have been made to describe how a tailored national park designation could deliver on Galloway's priorities.

In relation to the paper consultation documents distributed to homes by Royal Mail, it is clear that there is no method to ensure that each individual's response is recorded, but only one response per household. This will almost certainly lead to underreporting of views. The consultation is not inclusive with a lack of recognition of the cost implications of posting the document back, particularly during this cost-of-living crisis. The views of those on low income must not be excluded.

I have serious concerns relating to the revision of the current National Park (Scotland) 2000 Act as part of the Natural Environment Bill which will run almost concurrently with the Parliament considering the proposal for a new National Park. This would mean that if a Galloway was designated as a national park, it could come under legislation which is different to what Nature Scot are currently consulting on! In effect, changing the rules halfway through the game! This is totally unacceptable, and in itself is a reason to pause this consultation until the legislation is clear. Furthermore in the absence of any review of the performance of current 2 National Parks, we should wait until such a process has been completed to ensure that any new National Park designation will benefit from lessons learnt.

In summary my concerns are significantly broader than the implications of the consultation's perceived bias. If the process is seen as unfair and not fit for purpose, it will undermine public trust in NatureScot and more importantly the legitimacy of the consultation's outcomes, potentially affecting community relations long-term. Ensuring a transparent and balanced consultation is crucial for maintaining public confidence and achieving a genuinely representative outcome.

Having listened to many diverse views, including those who believe that this process may well be subject to legal challenge. There are also those who are currently not in support of a National Park who would be much more likely to participate more positively in the designation process if the current approach was paused and review. It is so important that we get this decision right. I do not believe that is possible with the process being undertaken at the moment.

I respectfully call on you as Cabinet Secretary to halt the process until such a time when future National Park legislation is in place as part of the new National Environment Act; when a review of the current 2 National Parks has been carried out, and a comprehensive and fit for purpose consultation can be undertaken over an appropriate period without the constraints of the electoral cycle.

I look forward to your response, and I would also welcome a further opportunity to discuss my proposal for a pause with you at your earliest convenience.

Kind Regards

Finlay'