



A Proposed New National Park in Scotland

February 2025

Introduction to Scottish Environment LINK

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 40 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

Its member bodies represent a wide community of environmental interest, sharing the common goal of contributing to a more sustainable society. LINK provides a forum for these organisations, enabling informed debate, assisting co-operation within the voluntary sector, and acting as a strong voice for the environment. Acting at local, national and international levels, LINK aims to ensure that the environmental community participates in the development of policy and legislation affecting Scotland.

LINK works mainly through groups of members working together on topics of mutual interest, exploring the issues and developing advocacy to promote sustainable development, respecting environmental limits. This consultation response was written by LINK's Land Use and Land Reform Group.

1. Response

Section 1 - Gauging support for the proposal and alternatives to it

Q1a To what extent do you support the idea of a new National Park being established in the south west of Scotland?

Strongly support

Q1b Please tell us the main reason(s) for your opinion.

Scottish Environment LINK has been neutral on the location of any new National Park(s) throughout the nomination process. LINK supports National Parks in principle and believes Parks can play a valuable role in tackling the climate and nature emergencies, alongside other responsibilities. The establishment of a new National Park should support sustainable integrated land management, nature recovery, climate action, and the improved wellbeing of local communities.

In 2024 we commissioned two reports on the benefits of National Parks, which are available here:

<https://www.scotlink.org/publication/report-farming-benefits-of-national-parks/>

<https://www.scotlink.org/publication/social-and-economic-benefits-of-national-parks/>

Section 5 - Functions and powers of the proposed National Park Authority

Q7 Are there any further existing functions and powers from recent legislation that would be beneficial for this Park Authority to be able to draw on and why?

As the proposed National Park includes an extensive coastline it would be appropriate for the Park to be a key consultee for the purposes of marine planning.

The development of Regional Land Use Partnerships (RLUPs), and the potential role of RLUFs in directing both public funding and private investment, has a clear link to the role of a National Park in developing a Park Plan. Scottish Environment LINK recently published a [report prepared by SAC Consulting](#) which outlines how RLUPs could develop following the pilot partnerships.



There may be a relevant role for Park Authorities in implementing requirements from the Land Reform Bill currently under consideration, although due to the size of average land holdings this may be less relevant in Galloway. This could include commenting and advising on proposed management plans.

Although not strictly an existing power or function, we hope that the forthcoming Natural Environment Bill will contain amendments to the existing National Parks legislation that introduce stronger duties on other public bodies to contribute to the implementation of National Park Plans and to further their aims.

Q8a Do you agree with the need for a bespoke approach suggested for the planning function for a National Park authority in Galloway?

Maybe

Q8b Looking at the possible options in Box 5-2, how do you think this should work in practice?

It is our view that the National Park should be responsible for development planning, ensuring that the Local Development Plan is consistent with the Park Plan. If the proposed Park is not a planning authority it will be limited in its ability to tackle some issues at scale and to ensure overall policy coherence. An approach similar to the Cairngorms model, where local authorities consider planning applications under the terms of the Local Development Plan prepared by the Park Authority, may be appropriate in Galloway.

Q8c What alternatives should be considered and why?

We believe that the proposed National Park Authority should either be a full planning authority with responsibility for development planning, development management and enforcement (option A under the Act) or operate under a bespoke arrangement similar to the call-in system operated in the Cairngorms National Park (a combination of options B and C under the Act).

Access, recreation and visitor management

Q9a Do you agree that the National Park should, in principle, become an access authority for its area?

Yes. Access and visitor management are core to a National Park's aims, specifically the third aim set out in the National Parks (Scotland) Act 2000. A new Park must have the powers extended to existing Park Authorities under the Land Reform (Scotland) Act 2003.

We feel strongly that the NPA should form a local access forum and become the access authority. This will allow access to be managed strategically with the ability to consider and plan for any displacement of visitors. It would also allow for a park-wide approach which should be more easily understood by visitors compared with the alternative of different jurisdictions taking different approaches to provision, signage, etc.

Q9c Do you agree with the suggested approach to core path planning?

We would support an integrated core path plan for the whole area of a National Park.

Q9e What are the strengths and weakness of these options for access and other fora?

A new National Park should have its own access forum. The more that can be done to encourage people to think and act on access Park-wide the better for more active and more sustainable transport for locals and visitors. This is especially true given that even the smallest Park area proposed straddles the watershed and that the existing administrative and social divides are deep and entrenched – to the disadvantage of the communities concerned.



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Given the concerns of part of the farming community it will be crucial for the NPA to engage and develop a good relationship with farmers and to demonstrate that responsible access will not impinge on day-to-day work on farms. A functioning whole Park access forum would play a role in this by allowing issues to be raised and dealt with timeously and speeding up the strengthening of the path network.

We would be happy to see a National Park Authority establish an advisory forum with a wider remit on recreation and visitor management in addition to a local access forum covering the whole Park.

Q9f Are there any other options you would want to see considered?

We would like to see a new NPA also taking responsibility for rights of way. We assume that this would need to be detailed in the designation order.

Q10a Do you think that the new National Park should establish its own ranger service?

Yes

Q10b What are the strengths and weakness of this approach?

A National Park Ranger Service can play an important role in helping to achieve the right balance between access, public understanding, land management requirements and nature conservation interests. Rangers can act as the public face of a National Park and can also support volunteering in the park area.

Forestry and wind farm development

Q11a Do you agree with these possible arrangements?

Maybe

Q11b If not, what alternative approaches should be considered and why?

We agree with the proposals that the NPA will work closely with those sectors and draw up its Park Plan in ways that support their long-term success but which must also deliver on the National Park's statutory aims. In addressing nature depletion and climate change National Parks must be in the forefront of mitigation and recovery, with carbon sequestration, soil protection and woodland and nature recovery playing key parts rather than the focus being solely on afforestation and renewable energy. The National Park Authority will have a key role in ensuring these are all taken forward effectively, and where most appropriate.

We firmly agree that the proposals for the NPA to become a statutory consultee on FLS management plans, Scottish Forestry regulation and funding decisions and ECU planning decisions (as stated in para 5-13) are essential steps towards integrated land management.

We also agree there is merit in the NPA and FLS jointly producing a management plan for the Galloway Forest Park, ensuring the long-term vision for nature and recreation are set out as well as for timber production.

Section 6 - The governance and staffing arrangement for the National Park Authority

Size and make-up of the National Park Board

Q12a Do you support these proposals for the potential size and composition of a National Park Board in the Galloway area?

Maybe

Q12b What do you think would be the advantages or disadvantages of these suggested arrangements?



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The suggested quota of directly elected members has been raised from the minimum set out in the Act. This is potentially workable, as long as it is somehow ensured that the overall make-up of the Board contains the necessary expertise to be effective and the onus is on those elected or appointed to be interested in and committed to the aims of the National Park and to, for instance, participate in elected member training (eg on the planning system) where appropriate.

It is important that the Board contains both local representation and a suitable level of expertise in line with the objectives of Park status.

Areas of expertise required by the National Park Board

Q13a Should Scottish Minister appointments to the Board include expertise on nature, farming and forestry?
Maybe.

Q13b What other areas of expertise would the Board require, and why?

It is important that the environmental objectives of the Park and the economic factors related to current land use are well understood by the Board. It is possible that locally elected or local authority representatives may themselves be, for example, active farmers. Ministers should be obliged to ensure the overall balance of skills, experience and backgrounds with specific attention given to nature, farming and forestry.

The board should also have understanding of recreation and enjoyment.

An understanding of the local economy beyond farming, forestry and renewables would be strongly beneficial. An understanding of the coastal and marine environment, including recreation and blue economy, should be incorporated.

Q14 Do you have suggestions for the topics that National Park sub-committees and advisory groups should be created for?

Strategic land use planning

Private finance

Given that the vast majority of land use in the area is agricultural, the new National Park Authority should have a sub-committee and/or advisory service for farm conservation. The Cairngorms National Park Authority's Farm Conservation Adviser assists with biodiversity planning, AECS advice, establishing trees, carbon auditing, and more. A new NPA in the Galloway region would be a key opportunity to support integrating more nature and climate friendly farming practices in the area, alongside the development of new agri-support schemes at national level.

Q15 What steps could be taken to ensure a new National Park operated in ways which are inclusive of ethnic minorities and other protected characteristics?

Work carried out on behalf of NatureScot in 2022 produced some helpful recommendations about the development of new National Parks and inclusivity that should continue to be borne in mind. In summary these were:

- Proactively engage with a range of Disabled People's Organisations and Access Panels (Access Panels being groups of disabled volunteers who work together to improve physical access and wider social inclusion in their local communities throughout the process of designating new National Parks).
- At future stages of National Park development, consider the following aspects of accessibility and inclusion for disabled people: pathways, seating, buildings, toilets, transport, information and signage.
- Create opportunities for young people to have influence over the way National Parks are managed through the use of Youth Committees or Youth Boards.



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- Prioritise the accessibility of National Park sites in terms of affordable physical access to the site, physical accessibility within the site, and making visitors feel welcome to visit that place.
- A National Park has to take a holistic view, accounting for its contributions to net zero, biodiversity, the circular economy, employment opportunities, and access to nature for people.
- Communication is essential to explain the benefits for everyone.
- As part of this work, Disability Equality Scotland (DES) polled its members with the question “Do you support proposals to establish a new National Park in Scotland by 2026?” To which 88% said yes.
- The above was summarised from National Park Commission SAG 5-1 – Centring views of Young People and People with Disabilities on National Parks available on NatureScot website.

Timing of elections of directly elected members

Q16 Views are sought on the timing of the direct elections in respect to the selection of other elements of National Park Board.

If Scottish Ministers were to seek to balance the overall skill set of the Board, then presumably the appointment process would have to happen after the direct election and nominations process, rather than the other way round.

National Park staffing

Q17a What options for using the existing public sector staff and resources to undertake the work of the National Park Authority should be considered and why?

We note that the consultation document states that “with three National Parks, a single National Park agency could also become a more viable option”. There is a case for shared resources between the Parks but the desirability of this approach would depend on the exact functions to be shared and any potential impact on service delivery.

Q18a What level of staffing do you think is appropriate for the area, powers and functions and governance arrangements being considered?

A CEO, plus around 25 staff (*as outlined in the consultation report re supporting Board, develop and implement partnership plan and planning, access and land use functions plus further staff (beyond the 25) to provide ranger and visitor services tbc*) may not be enough to play the sort of catalytic, facilitating role that a National Park should be playing, however, there are a lot of variables which will determine the necessary level of staffing from the size of the National Park, and how any services and functions shared with other public bodies (and potentially the Biosphere) are arranged. So the scale of additional resources available to the Biosphere, may affect staffing level at the National Park.

As implied in Q17, the net increase in public sector employment and expenditure will depend on the extent to which an National Park takes over roles from local authorities (and potentially other public bodies) which they therefore no longer need to provide, and also the degree to which the National Park and these bodies can share expertise that the former would either need to acquire directly or to buy in.

Taking on a full planning authority role would probably require in the region of 10 FTE staff to cover development planning, development management (even on a call-in basis), enforcement, and administration. (Estimate based on equivalent in CNPA).

Q18b What other areas of work would require further staffing and why?



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Marine/coastal conservation and engagement with commercial and recreational interests (even if the National Park boundary is MLWS on the coast). The NPA must be a key player in the Solway Marine Regional Plan, however, given that only some of the north Solway coastline is likely to be included in the National Park we do not anticipate the NPA taking over responsibility for regional marine planning.

This response was compiled on behalf of LINK Land Use and Land Reform Group and is supported by:

Action to Protect Rural Scotland
Ramblers Scotland
RSPB Scotland
Scottish Campaign for National Parks
Scottish Countryside Rangers Association
Scottish Wild Land Group

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