

Scottish Campaign for National Parks	<b>A National Parks Strategy for Scotland</b>	The Association for the Protection of Rural Scotland
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**SCOTTISH NATIONAL PARKS STRATEGY PROJECT**

**Public Petition PE01556 – A National Parks Strategy for Scotland**

**Responses to Written Submissions**

This document responds on behalf of the Scottish Campaign for National Parks (SCNP) and The Association for the Protection of Rural Scotland (APRS) to the written submissions on Public Petition PE01556 received by the Scottish Parliament's Public Petitions Committee.

**John Muir Trust**

We welcome the strong support for our petition expressed by the John Muir Trust (JMT). In particular JMT stresses the socio-economic benefits which more National Parks could bring to Scotland in relation to encouraging sustainable tourism, quoting VisitScotland as reporting scenic beauty as the key motivator for tourist visits to Scotland. We agree with JMT that the two existing National Parks have clearly demonstrated how valuable an accolade National Park designation can be.

JMT's principal interest is the protection and enhancement of wild land for the benefit of both people and wildlife. It observes that all seven areas proposed by SCNP and APRS as potential National Parks would include significant wild land areas; we agree that granting National Park status to these areas would help to demonstrate how wild land can be a valued heritage resource and asset rather than a constraint.

**NFU Scotland**

We thank NFU Scotland for providing a written submission. We are pleased to note that it welcomes efforts by the existing National Parks to increase engagement with the farming community, and that some of its members are positive about benefitting from increased visitor numbers. However, we also note that NFU Scotland remains unconvinced that the case has been made for the creation of new National Parks, largely because it feels that the existing National Parks have not delivered sufficient benefits for farmers. This is hardly surprising, as farmers are rarely enthusiastic about environmental designations; however, their reported scepticism may be partly due to resistance by the Scottish Government to allow National Park Authorities to play a more active part in administering the Scottish Rural Development Programme.

The NFU Scotland submission is partly based on a brief email poll of its members. While appreciating this genuine effort to seek local views, we urge the Committee not to place too much reliance on its results, as most of the questions were only answered by between two and six respondents; indeed NFU Scotland itself acknowledges the limitations of the poll. However, we were pleased to note a number of positive comments made by farmers, including the following:

*“National Parks are a good idea if the farmers and business within them are ... allowed and helped to develop”*

*“I would support the creation of maritime parks which controlled dredging of inshore waters for shellfish”*

*“I’d rather be in one than just outside one”*

### RSPB Scotland

We welcome the support for more National Parks from RSPB Scotland, which demonstrates that National Parks are supported by organisations whose primary interest is biodiversity as well as those which champion landscape or recreation. As its submission stresses, its role as a significant land manager and operator of visitor attractions in the two existing National Parks adds weight to its views, as do its strong links with National Park authority staff and Board Members. It emphasises the ‘overwhelming public support’ which exists for National Parks in Scotland; we were interested to note its suggestion that this depends however to some extent on the future expansion of the network.

The RSPB Scotland response rightly argues that the case for expanding the National Parks network is linked to the scope for improvement in the operation of the existing National Parks, as set out in the SCNP/APRS *Unfinished Business* report, for example in acting as exemplars of sustainable development. We agree with RSPB Scotland that any forward strategy should include at least one coastal and marine National Park, given the international importance for biodiversity of Scotland’s coastal and marine environments.

### Scottish Government

It is particularly disappointing that the Scottish Government has failed to respond to the Committee’s questions arising from our Petition, given the central role which it would have in preparing a strategy to create more National Parks in Scotland. We hope that the Committee will continue to press the Scottish Government to articulate the reasons behind its thinking on this issue, and in particular to explain:

- Why it dropped Stage 2 of its 2009 National Parks Review, thereby denying the opportunity to discuss some of the more fundamentally important questions facing our National Parks, and did not establish the National Strategy Group recommended by the Review
- What action it has taken to fulfil its 2011 manifesto commitment to “work with communities to explore the creation of new National Parks”

It is worth recording however that on 19 May 2015 SCNP and APRS held a useful meeting with the Environment Minister, at which constructive discussion of some of these issues took place and some key points for further exploration at a future date were identified.

### Scottish Land and Estates

We thank SLE for providing a written submission. We appreciate the balanced approach taken, including the honest acknowledgement of divergent views within its membership ranging from strong opposition to full support. The broadly positive remarks about the performance of the existing National Parks in terms of engagement with landowners are welcome. The submission reports some scepticism of National Parks as “an additional layer of bureaucracy”. This rather simplistic criticism is however not borne out by the facts, as National Parks generally replace functions carried out by other bodies rather than

adding to them. For example, in Loch Lomond and the Trossachs National Park, planning applications are simply made to the Park Authority instead of to the local Council. SLE understandably stresses the importance of local accountability in decision-making by National Park Authorities (NPAs), yet this is already the case, as the 2000 Act ensures that NPAs have an inbuilt majority of locally-elected people and local Councillors. SLE argues that future National Parks should only be designated where they are wanted by local people rather than determined by a national strategy. Although local support is of course important, and indeed already present in some of the areas we propose as additional National Parks, we would argue that when considering the allocation of national resources to national assets it is essential that a national overview of priorities should be taken.

### Scottish Natural Heritage

We thank SNH for providing a written submission. However, we are disappointed that it merely notes rather passively that “Decisions on further National Parks are matters for Scottish Ministers”, implying that it has no role in the matter. In our opinion SNH should be an active champion for landscape, recreation and biodiversity demonstrating strong leadership in advising the Scottish Government on strategies and policies which will best support these key national assets.

However, we are pleased to note that it continues in a much more positive vein, and wholeheartedly endorse the following statement:

*We consider that National Parks are positive assets for Scotland, acting both as an internationally recognised accolade that celebrates some of Scotland’s finest nature and landscapes, but also as a powerful management and governance tool to help deliver conservation objectives more effectively alongside social and economic ones. While relatively young in international terms, experience of the first two National Parks is positive. It is reasonable to consider if this approach should be extended to other areas of Scotland.*

SNH rightly notes the considerable flexibility given by the 2000 Act in terms of the powers, structures and governance of any future National Parks, and correctly observes that any strategy for more National Parks should take place in the context of our other landscape designations.

### Scottish Wildlife Trust

It is unfortunate that the Scottish Wildlife Trust (SWT) has not provided a written submission. However, its full support for the petition is clear from the following recent (30 March 2015) press quote from its Chief Executive Jonny Hughes:

*“The Scottish Wildlife Trust firmly believes that an increase in the number of national parks would not just be good for the environment, but also for Scotland’s economy. However, we shouldn’t limit ourselves to thinking that national parks should be just in rural areas. The Scottish Wildlife Trust would like to see consideration given to the designation of urban national parks and a revisiting of proposals for marine national parks which would create jobs and help restore damaged wildlife habitats. National parks are something of a glaring opportunity for Scotland’s people, environment and economy.”*

<http://www.strathspey-herald.co.uk/News/Charity-backs-calls-for-more-Scottish-national-parks-30032015.htm>)

### Additional Points for Discussion

We wish to make three brief additional points to the Committee at this stage:

1. In our evidence to the Committee on 28 April we referred to our recent report *The Socio-Economic Benefits of New National Park Designations in Scotland*. We encourage Committee Members to read this report, which can be found along with several other key documents at:  
<http://www.ruralscotland.btck.co.uk/Projects/ScottishNationalParksStrategy>
2. We wish to advise Members that the Welsh Government is currently carrying out a comprehensive review of the three National Parks and five Areas of Outstanding Natural Beauty in Wales, which could provide some useful context for the situation in Scotland.
3. The Committee might find it worthwhile to seek views on the Petition from other organisations which have been closely involved in the National Parks debate over the years, in particular The National Trust for Scotland, Ramblers Scotland and VisitScotland, but potentially also the Mountaineering Council of Scotland, the Scottish Wild Land Group and Woodland Trust Scotland.

John Mayhew  
Petitioner

on behalf of SCNP and APRS

17 June 2015