Dear Convener,

Petition PE01556: A National Parks Strategy for Scotland

Thank you for the invitation to provide our views on the above petition. In what follows we set out our general approach to National Parks before addressing the specific issue raised in the petition.

Although historically landowners have tended to be opposed to the creation of National Parks and new layers of bureaucracy, today Scottish Land & Estates takes a pragmatic view. Scottish Land & Estates is neither opposed to, nor an advocate for, new National Parks. We have a broad membership that includes some that would be very keen to see new National Parks and some that would be opposed. While National Park status can deliver benefits, Scottish Land & Estates simply takes the view that where the land managers, local communities and local authorities want such an accolade, and all the necessary analysis has been undertaken to ensure that a new national park will meet the aims of such designated areas, then there should be nothing to stop the creation of a new park, provided that it can be managed and funded appropriately.

Existing National Parks

While there is a diversity of views about the National Parks within our membership—with some members being very supportive, some actively opposed and others that were opposed coming round through engagement with the park authorities—we believe that, on balance, existing National Parks have, on balance, performed well.

At an organisational level, Scottish Land & Estates has good working relationships with the two National Park Authorities. For example, Scottish Land & Estates recently collaborated with the Cairngorms National Park Authority to undertake research into the economic, social and environmental contribution of landowners in the park area. The CNPA wanted to undertake this work to get a better understanding of the sorts of activity going on in the park in order to better target its support for landowners to help deliver the overall park aims. We believe that the Park Authority staff engage with landowners as positively as they can and have
sought to foster good relations and to work collaboratively and facilitate positive projects. In general, then, the two existing parks have added a sense of cohesiveness and a focus on local sustainable development, which is positive. Consequently, Scottish Land & Estates can see the benefits of National Park status where it exists at present.

**New National Parks**

Being able to see the benefits of National Park status, however, does not necessarily translate into an automatic support for the creation of more National Parks as this is a more complicated issue. Some remain sceptical about National Parks simply being an additional layer of bureaucracy in an already overly bureaucratic environment. This concern would be very important if new areas were to be considered as people not currently subject to a National Park regime would potentially see it as an imposition. Consequently, Scottish Land & Estates believes that National Parks should ideally be wanted rather than imposed.

The SCNP and APRS position is that National Parks bring a wide range of environmental, social and economic benefits; there is public support for National Parks; the case remains strong for designating more areas...so the government should prepare and implement a strategy to designate more National Parks in Scotland. But while Scottish Land & Estates would not argue with the claims about the benefits or that there are people who want to see new National Parks designated, we would question a top-down approach that was focused on designating more National Parks simply because some people think there should be more.

Scottish Land & Estates would not support a way forward that established at a national, strategic level, an ideal number of national parks as if once we have nine national parks we will somehow have completed the job and reached parity with other countries. Our focus should not be on having more National Parks for the sake of it or as a matter of principle; it should be on working out whether or not new parks are actually wanted on the ground and determining where the designation of new parks could really enhance the proposed areas. Some of this work has been started by the SCNP, which is useful.

Scotland’s National Parks are somewhat different from the National Park model in many other countries in as much as they are not uninhabited wilderness areas, but are areas where people live and work. What is really important is that it is those local people that have the strongest say in the decision-making process. National Parks should not be designated on the basis that those who live 100 miles or more away from them, feel that these areas are particularly special and need to be given a particular status, but because such status will bring real benefits to those living there.

This raises a question for us as to whether a national strategy is the right way forward. If a strategy were less about simply implementing the pre-established goal of more National Parks and more about establishing a national and local conversation about whether or not more National Parks are needed, desired and would represent a good return for the required public investment in them, then Scottish Land & Estates would be comfortable supporting this as a way forward. But
what we have in mind is less a strategy and more a review led by an independent person. We know that SCNP and APRS are likely to be disappointed at this suggestion because there was a review previously, but that was seven years ago and we are now in a new political and financial context. It is perfectly legitimate for SCNP and APRS to press the government and ask what is it doing on this agenda, but it is important to recognise that things have moved on.

A key element of any moves with regards to new National Parks must be funding. This is where the Scottish Government’s aspirations on national parks have hit the buffers. If there is no money to support the process it would be unfair to those that hoped to secure the accolade to raise expectations. So there is a need to be clear from the outset that any proposal can be properly funded. Given the current national finances, the Scottish Government’s position is understandable.

The review that took place in 2008 did suggest that if more National Parks were created there would be a need to look again at the structures surrounding governance i.e. moving away from two stand-alone organisations, which are small and duplicate functions, towards a more centralised model. This may be one way to reduce the costs of new National Parks but such reorganisation can in itself be expensive and this would have to be something that is more closely examined before any commitment to more National Parks is made.

In summary, Scottish Land & Estates appreciates that the existing National Parks have to date generally been a force for good and new parks may well also deliver positive outcomes, but we believe that it is important that any new area should be wanted rather than imposed and that they should be properly funded. We are somewhat sceptical that a strategy is the best way to move forward, depending on how it is framed; some sort of review may be more appropriate given the new political and financial context.

I hope that these remarks are useful.

Yours sincerely,

Andrew Midgley