

## **PE2089/B: Stop More National Parks in Scotland Petitioner Submission, 4 June 2024**

We are grateful to the committee for the opportunity to put our case against the expansion of national parks in Scotland, and we remain specifically concerned about the possibility of Lochaber being selected, should the Scottish Government decide to press ahead.

To an extent It is understandable that the Scottish Government should use its initial response to defend its existing policy, but we are disappointed that there is no acknowledgement of the widespread and well-documented problems associated with the existing two national parks, and we remain convinced that an independent review of their operations is essential before any decision is taken to add a third. That would surely just be common sense, and at least provides an opportunity to improve the current operations.

But we are primarily concerned that the response indicated that the many people in Lochaber firmly opposed to a national park in our area will not have their voices heard and we hope the committee will go some way to addressing our fears.

Our concerns are as follows:

1. The consultation with communities has been inadequate, without a rigorous process for obtaining an accurate assessment of local opinion, and we do not accept there is broad support for a national park in Lochaber.
2. Rather than a national park, the most pressing needs of Lochaber are the provision of adequate road connections and health care. The A82 is need of upgrading and with the current volume of visitors, our transport infrastructure is at breaking point. It would be irresponsible to attract more tourism until this is addressed.
3. The issue which does have widespread support is to replace the Belford Hospital, a £160m project due in 2028 which was put on hold when the Scottish Government paused capital projects at the beginning of 2024. We cannot understand how the Scottish Government can countenance national park running costs of at least £13m a year, what it currently costs the Cairngorms Park while this crucial project remains blocked.
4. Our own consultations with landowners resulted 100 per cent opposition to a national park for Lochaber. If a key requirement for a successful national park bid is support from key stakeholders, there can be none more crucial than those who own the land it will cover.
5. The Scottish Government recently promised its approach to its depopulation strategy would be “Local by default, National by agreement.” In our view, that would be inconsistent with any attempt to impose a national park in Lochaber against demonstrably widespread local opposition.

6. Given the Loch Lomond and Trossachs (LLTNP) and Cairngorm (CNP) parks have been in existence for 21 years, a proper independent review would make sense, and such an analysis would be incomplete without the views of residents. From our many conversations, we know local attitudes are far from positive.

7. Claimed “investments” by CNP are not, in our experience, ones which locals supported. Beavers were introduced against the wishes of local farmers/crofters who have now established a group to defend their interests. In both the CNP and LLTNP areas, landowners and farmers are increasingly concerned about needless bureaucracy, over-regulation, and a general dismissiveness towards the needs of those who look after the land.

8. The Flamingo Land proposal is the best possible example of local opinion being ignored by a National Park with full control over planning. To date there have been over 94,000 public objections, yet it has LLTNP support, despite its primary aim supposedly being conservation. It is hardly surprising that so many local people are horrified, and it does bring into question the whole purpose of the national park system. We would argue the LLTNP support for Flamingo Land is adequate justification for full parks review on its own.

9. Where local opinion has been canvassed within existing parks, the response has been overwhelmingly negative. In Aviemore and Spey Valley, a community referendum found 92 per cent of respondents (444 votes) said CNP “was not working well”. Only 10 people thought it was.

10. When Perth and Kinross Council recently sought views about a new park, it received just 352 responses out of a population of approximately 68,000, and less than 200 were supportive, many of them living outside the area. But 78 per cent of all land managers who responded were opposed.

11. Under the Bute House Agreement, which included national park expansion, the Scottish Government was clear that ministers would “only designate new national parks in response to local community demand,” yet has repeated its intention to create at least one. With strong likelihood that none of the five bid areas under consideration can demonstrate community demand, this suggests the creation of a new park is already a foregone conclusion and the only remaining decision is which one. Therefore, we have significant concerns about the fairness and openness of the selection process, and this requires further parliamentary scrutiny.

12. Lochaber farmers, fishermen, crofters, and land managers are deeply sceptical about Nature Scot, and as they are to play a crucial role as Reporter there is little confidence that in the national park selection process will be as even-handed as it needs to be.

We hope you can see our concerns are not inconsiderable or without substance and we hope to have the opportunity to discuss them with the committee in person.