

# **PE2089/G: Stop More National Parks in Scotland**

## **Finlay Carson MSP written submission, 13 January 2025**

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'