



Proposed Galloway National Park Consultation

Delving into the Issues

- There are significant concerns about both the capacity and capability of NatureScot in their role as consultation reporter.
- NatureScot are not unbiased on the issue of National Parks and this has a clear impact on how the consultation is designed and outcomes presented.
- NatureScot have not delivered activities promised in the Reporter Plan **or** adequately explained how data will be analysed.
- What is being proposed is unclear and does not address key concerns leading to communication difficulties which have not been well managed.
- Both the process and materials produced are not accessible and do not meet the National Standards for Community Engagement.
- Overall, the consultation process appears biased and inadequate, designed to deliver political agenda rather than get things right for the community.

As the statutory phase of the consultation about the proposed new National Park in Galloway began, many concerns about the process had already been raised. Primary among these is the suitability of NatureScot to fulfil the role as unbiased Reporter. NatureScot's website is filled with information asserting the value of National Parks¹ with this position clearly reflected within the recently released consultation documents². They are the statutory adviser on natural heritage to the Scottish Government and derive most of their funding from them. This potential for bias has even been implicitly acknowledged by Government in their directions for the consultation³. They specifically instruct NatureScot to ***'ensure that any views which are those of NatureScot as statutory adviser on natural heritage matters are kept clear and distinct.'***

From the engagement phase of the consultation, the natural heritage focus of NatureScot also appeared to narrow their view on who should be involved. For example, at a public meeting early in October 2024 they indicated there had been no contact with key services, such as the NHS and other large employers. Their inherent support for National Parks is also clear within the consultation documents and the survey design⁴. There are several questions which have no option to say, 'I do not support the proposed park' - e.g. when

¹ <https://www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/national-designations/national-parks/value-national-parks-scotland>

² <https://www.nature.scot/sites/default/files/2024-11/full-technical-consultation-proposed-national-park-in-galloway.pdf> Nov 2024

³ <https://www.gov.scot/publications/proposal-scottish-ministers-national-park-galloway/pages/6/>

⁴ <https://www.smartsurvey.co.uk/s/nationalparksurveyconsultation/>

asking about the proposed park area there is only an option to select one of the alternatives or 'don't know/no opinion.'

There are significant concerns about how organisational bias will have an impact on how NatureScot analyse and report consultation data, exacerbated by the lack of response to questions about their methodology for interpreting and analysing responses. A clear example of this bias is the way survey data is offered as evidence of support for a new National Park within the consultation document⁵. NatureScot cite a public opinion survey from 2022⁶ which 'indicated that 89% of people in Scotland supported the creation of a new National Park.' What is not made clear is that this survey involved **only 1,010 people**. The same survey also states, '*Groups most likely to strongly support the creation of new National Parks included residents of the South of Scotland (56%)*', which is based on the views of **59** residents of the area, so just over **30** people. NatureScot also fail to include findings from their survey of young people also carried out in 2022⁷ which placed the establishment of a new National Park as **least important from a list of 14** priorities from NatureScot's Corporate Plan.

NatureScot's capability to carry out their own plans is also in doubt as they have failed to deliver promised activities such as distributing an introductory leaflet to all households or hold drop-in surgeries in the engagement phase. The online engagement platform appeared to assume that a new National Park would go ahead and initially only offered options about its scope, functions etc. The platform was also complex to use and inaccessible for those with limited IT skills.

There is a distinct lack of clarity about what is being proposed, with the consultation being presented as an opportunity to create a 'new kind' of Park. In reality, the legislative framework has limited flexibility and detailed proposals will only emerge from a statutory Park Plan, developed after a Park is in place. The proposal also fails to provide evidence on how any new model could avoid the problems experienced in current Parks⁸. The summary FAQs present information skewed in favour of the proposal with only one short paragraph on impact on services. Instead, there is a bland assurance that '*special attention would be needed to ensure Park status did not create new issues / pressures.*' An acknowledgement of '*significant concern*' related the loss of affordable housing does appear in the full technical consultation paper, although again there is no clarity on how to address this, just a statement that, '*a new Park Authority would need to keep this issue under active review and seek to address any significant implications.*'

The proposal also fails to address a core contradiction which stresses conservation, at the same time as promoting economic regeneration via increased tourism. In short, the consultation presents an undefined model with little evidence on how this will achieve positive outcomes and avoid well documented problems. At a recent session of the Citizen Participation and Public Petitions Committee⁹ Maurice Golden (MSP and committee member) commented on the process, '*It sounds as though communities are being asked to sign a blank cheque for something when they do not know how it is going to impact on them.*'

This scarcity of robust and accessible information together with a failure to effectively manage communications and control the tone of the debate (e.g. repeated unsubstantiated claims of

⁵ <https://www.nature.scot/sites/default/files/2024-11/full-technical-consultation-proposed-national-park-in-galloway.pdf> Nov 2024

⁶ Stewart, D. and Eccleston, J. 2023. NatureScot Opinion Survey 2022. NatureScot Research Report 1335.

⁷ Gardner, A. and Webster, C. 2022. Youth Survey on NatureScot's Corporate Plan 2022-2026. NatureScot Research Report No. 1295.

⁸ E.g. 'The Uncomfortable Truths' LLTNP National Park Partnership Plan 2024-2029

⁹ The Scottish Parliament 30th Oct 2024

misinformation) has led to frustration and anger with a potential for long-term damage to community relations.¹⁰

The consultation also appears to fall well short of meeting the National Standards for Community Engagement¹¹ These are Scotland's good-practice principles designed to support and inform the process of community engagement. They are intended to act as a benchmark and reference for best practice and are widely accepted as key principles for effective practice (including by ScotGov.) The standards are supported by the principles of fairness and equality, and state engagement should be:

- effective – in meeting the needs and expectations of the people involved;
- efficient – by being well informed and properly planned; and
- fair – by giving people who may face additional barriers to getting involved an equal opportunity to participate.

The community were anticipating they would have access to unbiased information on the proposal and instead have been offered biased information which does not offer the detail that they need to make informed decisions. In that respect, the consultation cannot be deemed to be effective. The process overall has also been fraught with problems in its delivery from the outset. This includes for example, a failure to provide leaflets as promised, the cancellation of drop in events during the engagement phase, use of materials which are not in an accessible format and failure to effectively advertise consultation events. It cannot be described as efficient or fair.

Despite the two-week extension to the process, given all of the difficulties identified, it can only be deemed inadequate to fully engage the community and address their concerns. It appears tied to a political agenda to designate a park before the 2026 elections, rather than aiming to get things right for the community who will be most affected, i.e. those who live and work in the area. International experience indicates that these initiatives are only successful if there is sufficient dialogue with communities and they are not perceived to be imposed¹². This consultation process does not allow that to happen.

¹⁰ Multiple media reports of local opposition e.g. **Holyrood is riding roughshod over rural Scots**

[Magnus Linklater](#) The Times 7th October 2024, **Take a time out on plans for a new national park** Prof Roger Crofts The Times 14th Oct, BBC News 6th August 2024 Opponents launch campaign against new national park

¹¹ <https://www.scdc.org.uk/what/national-standards>

¹² 'Take a time out on plans for a new national park' Prof Roger Crofts The Times 14th Oct