



Proposed Galloway National Park consultation response

1. In what capacity are you responding to this consultation?

As a Community led Organisation – nogallowaynationalpark.org

Please provide us with the full postcode of your primary residence

DG7 2HP

2. Please provide contact information

c/o xxxxxxxxxxx Gatehouse of Fleet, Castle Douglas, DG7 2HP

Email address nogallowaynp@gmail.com

3. NatureScot would like your permission to publish your consultation response. Please indicate your publishing preference

Publish response with name

4. Which of the following statements apply to you? Tick all that apply

All residents living and working in proposed area

Q1a To what extent do you support the idea of a new National Park being established in the south west of Scotland? **Strongly oppose**

Q1b Please tell us the main reason(s) for your opinion.

Our organisation is strongly opposed to a proposed National Park.

We are a broad-based community organisation set up by the local community specifically to express our opposition to this proposal, after the Government announced that Galloway had been selected as the preferred bid. We have hundreds of members and thousands of supporters on social media, with the majority only becoming aware of the proposal after the Government announcement.

We represent people from across our community with differing socio economic backgrounds, personal circumstances and ‘political’ views on why they oppose the proposal. We have therefore aimed collated these diverse views into the sections below:

Governance and local self-government – Our members believe in the principle of Local Self-Government through which public responsibilities should be carried out by the authorities closest to citizens, and that management of many aspects of public life should be controlled at a Local Authority level. This principle reflects the European Charter of Local Self-Government, which commits the parties to applying basic rules guaranteeing the political, administrative and financial independence of local authorities. It also provides that the principle of local self-government shall be recognised in domestic legislation. Furthermore, it is a principle which is supported by the Scottish Government. In June 2023 the Convention of Scottish Local Authorities and the Scottish Government agreed a new Partnership Agreement, the Verity House Agreement¹. This set out their vision for a more collaborative approach to delivering shared priorities for the people of Scotland and included a commitment to European Charter of Local Self-Government. We believe that seeking to establish a Park Authority in our area fundamentally undermines this principle.

National Parks are run by a Park Authority, an executive non-departmental public body (NDPB.) As such they are directly accountable to Scottish Ministers, not the community the park is located within or their locally elected and accountable representatives in Local Authorities. The decision-making body of a Park Authority is its Board, with the Park Chief Executive being solely responsible for operational issues. Guidance for NDPB Board Members² states one of the main functions of a Board is to ‘Ensure that the strategy and plans are aligned with the [National Performance Framework](#)³ and the public body's statutory duties, and the policies and priorities of the Scottish Government’.

The Galloway National Park Association (GNPA) have emphasised the local focus of the proposed new National Park which they have claimed ‘*could assist local democracy...and contribute to the desired de-centralisation of power.*’⁴ They also claim a new National Park would ‘*work with our communities to give them a strong voice in their future through the National Park Board and Partnership Plan.*’ However, these claims are completely disingenuous and do not stand up to any degree of scrutiny. Instead of ‘*assisting local democracy*’ and ‘*contributing to the decentralisation of power*’ it establishes central Government control.

The governance arrangements presented in the consultation document are based on the National Parks (Scotland) Act 2000 and the forthcoming Natural Environment Bill will make changes to current arrangements and is likely to increase the number of central Government appointed Park Authority Board members. This will further diminish local voices and increase centralised control.

The impact of the forthcoming Natural Environment Bill - The consultation proposes a new Park based on the National Parks (Scotland) Act 2000. At the same time Government are preparing substantial changes to this legislation in the

¹ <https://www.gov.scot/publications/new-deal-local-government-partnership-agreement/>

² On Board: A Guide for Board Members of Statutory Boards

³ The Scottish Government’s ‘vision for a successful Scotland’

⁴ It’s Our Time GNPA May 2019

forthcoming Natural Environment Bill⁵. Full details of the forthcoming Bill are not yet available, although indications of the contents can be found in the Biodiversity - strategic framework⁶ consultation. Proposals included changes to the purpose, aims, park 'principle', duty on public bodies in the park, general powers and governance of National Parks. This disingenuous presentation of the legislative basis for the establishment of a new Park completely undermines the foundations of the current process.

Negative impact on the natural environment of the current National Park model

Many of our members are committed to protecting and conserving the natural environment and have significant concerns about the negative impacts on this within existing National Parks. In recent debates on the proposal for southwest Scotland much has been made of the potential for economic development through increasing tourism. The GNPA has referred to '*the National Park brand*' and the support this would offer to promote local businesses. This focus on opportunities for economic development appears to conveniently disregard widely acknowledged negative impacts of increased tourism and recreational activities on natural heritage and on communities.

There are concerns about whether it is possible to promote conservation at the same time as increasing consumption, in the form of tourism and recreation. This contradiction lies at the heart of National Park aims and what is being presented in the consultation. However clear evidence to demonstrate that National Parks can successfully achieve this is not on offer.⁷ Instead a recent report⁸ describes 'The Invisible Burden of Tourism,' where an increasing number of visitors to an area can exceed infrastructure capacity and cause harm to both the environment and local communities⁹.

Whilst the National Park '*brand*,' has been seen as a positive force for conservation, this is based on international models, where Parks were established to protect vast wilderness areas such as Yosemite. The reality for the natural environment inside UK National Parks appears rather at odds with this. For example '*there is no positive impact of being inside National Parks and the condition of Sites of Special Scientific Interest*¹⁰,' and in December 2023 the International Union for the Conservation of Nature National Committee UK Protected Areas Working Group downgraded the status of UK National Parks. I understand they no longer regard the UK designation of National Park as a Protected Area.¹¹

⁵ Programme for Government 2024-25: Serving Scotland 4 September 2024/25

⁶ <https://www.gov.scot/publications/tackling-nature-emergency-consultation-scotlands-strategic-framework-biodiversity/pages/5/>

⁷ Mark Rowe **The failure of Britain's national parks** Geographical 12 March 2020

⁸ Dr D Stanford **Who Pays for the Lake District? 2024**

⁹ Ibid - highlighting the significant negative issues directly linked to more visitors than local infrastructure can support and the 'hollowing out' of communities due to second homes and holiday lets

¹⁰ The British Ecological Society-Scottish Policy Group (BES-SPG) policy debate on National Parks with the Chartered Institute of Ecology and Environmental Management (CIEEM) October 6th 2022.

¹¹ Statements of Compliance for UK protected areas and 'other effective area-based conservation measures': 2023 review Protected Areas Working Group of the IUCN National Committee UK

A biodiversity report commissioned by GNPA highlights the special qualities of the area's biodiversity. This notes few other areas in the UK offer such a diverse range of habitats in a comparatively small area. Sadly, it also notes that the area has not escaped from the global biodiversity crisis and needs protection and restoration. I do not believe the proposed National Park, which places such emphasis on increasing tourism and recreation, can provide this.

We have also witnessed other more stark examples of the negative impacts of increased tourism at first hand, with damage to the environment caused by an influx of visitors in the post pandemic lockdown period. Local communities were horrified by irresponsible visitor behaviour such as littering, toileting and lighting fires. Sadly, such behaviour persists and an increase in vehicles and irresponsible parking causes more road kills of wild animals, the erosion of verges and air pollution. Marine motorised and non-motorised craft such as paddle boards and kayaks disrupt animal feeding and breeding behaviour. Pollution can result from the pressure of an increasing visitor population on limited local sewage systems. There is also an increased risk of the introduction and spread of invasive species and the spread of animal and plant diseases.

Even issues such as footpath erosion, caused by increasing numbers of walkers, can have a negative impact on biodiversity. Eroded paths are *'not only unsightly, but unpleasant to walk on and can lead to habitat loss as well as damage to the heritage, archaeological and natural history qualities of the area.'*¹² Excessive erosion on popular routes has an impact on wildlife, *'Degradation... has a harmful impact on the rivers and lakes as sediment washed off the hillside can cover the gravel in rivers and lakes used by fish to lay their eggs, reducing their breeding habitat. Sediment can also impact plant and insect numbers, which in turn will attract fewer birds.'*¹³

Without Park designation visitor numbers are already increasing, with the South of Scotland Destination Alliance (SSDA) recently reporting the area had grown its visitor numbers by 26 per cent in the last year. One of the aims of establishing a National Park is to increase this further, placing significant additional pressures on the natural environment and inadequate local infrastructure. We should also bear in mind that if visitor numbers were to increase to levels which cause significant harm to the environment and communities, as they have in some Parks, there are no mechanisms to impose limits on this.

Infrastructure, public services and resources

Our area already faces significant difficulties from limited infrastructure and inadequately resourced public services. We believe this will only be exacerbated by Nation Park designation. Dumfries and Galloway Council have noted that due to the rurality of the region, there are significant issues around the capacity and

¹² https://www.fixthefells.co.uk/wp-content/uploads/2017/12/path_erosion_factsheet.pdf

¹³ Joanne Backshall, Fix the Fells programme manager, quoted in <https://keswickreminder.co.uk/2021/08/27/500000-annual-cost-to-tackleerosion-on-lake-district-fells>

connectivity of the region's major roads (A75/A77.) The rail and bus network is limited and would not cope with increased demand due to National Park designation. All Public services are under severe pressures and there are insufficient resources to meet current demands, without additional demand from increased visitor numbers. For example, Dumfries and Galloway Council have identified a £34 million funding gap for 2025-2028 which means it needs to make savings of over **£11 million** a year for the next three years. Yet this proposal makes it clear that local authorities will continue to be responsible for providing key services across the area such as transport, waste collection and housing. Public services do not have the resources they need to meet current demand, they are facing significant cuts, and they will not be able to meet the increases in demand National Park designation would bring.

Housing

We are greatly concerned about the impact on the regions affordable housing stock. Dumfries and Galloway Council has declared a housing emergency and a National Park will have a negative impact on the availability of affordable housing. Whilst the exact impact is unclear Housing Market Research carried out in 2022 for Loch Lomond and the Trossachs National Park found 75% of National Park households cannot afford average house prices and 43% cannot afford lower value house prices. The impact on the rental market is also a concern where longer term rentals are converted to Air B&B and other holiday lets to meet visitor demand to the detriment of the local population.

Economic Development and Employment

Being a designated National Park will not automatically boost the local economy. Local businesses that don't cater for tourists are not likely see economic gains and may even face competition for resources. Seasonal tourism dependency creates an unstable economic environment with erratic employment opportunities and unreliable income throughout off-peak seasons. Whilst some new jobs may be created the majority are likely to be minimum wage, low skilled and seasonal. In the words of Fergus Ewing MSP *"Cairngorms and Lomond and Trossachs National Parks have now existed for 21 years. Perhaps uniquely for any MSP, I have lived within both areas and represented a large part of Cairngorms Park over the whole of that time. National Parks have been, in my view, a brake on development, and have not delivered benefits for the people who live and work there."*

Lack of local support and negative impact on community relations

Whilst there are local voices both for and against the proposal it seems abundantly clear that there is limited local support and significant opposition to it. Data published on the NatureScot Reporter web platform from the Engagement stage indicated over 56% of respondents against the proposal with around 27% in favour. The consultation meetings carried out as part of the statutory consultation, and other local public meetings arranged by Community Councils and other community groups have also demonstrated overwhelming opposition. The proposal originated in the Bute House Agreement, which includes the statement **'We believe that National Parks should be designated only in response to local community demand.'** I do not believe this consultation has demonstrated such demand from the local community and therefore should not go ahead. The whole consultation process has been beset with problems including a scarcity of impartial, robust and accessible

information together with a failure to effectively manage communications and control the tone of the debate. This has led to frustration and anger with a potential for long-term damage to community relations.¹⁴

Many of our members believe that we need to take action to protect and conserve our natural environment and address the climate emergency. However international evidence indicates that to achieve such positive change, common ground must be developed and consensus built. Instead our community has become deeply divided and we believe that trust in the environmental agenda has been lost and the reputation of environmental organisations, including NatureScot, has been irreparably damaged

Q2a Are there any alternatives to a National Park in Galloway that you would support?

We believe we should be building on local good practice and existing initiatives rather than imposing a centrally accountable non departmental Government body.

For example the work of Galloway and Southern Ayrshire UNESCO Biosphere offers a positive alternative. Their governance model is progressive, aiming for bottom-up collaboration between the people who live and work within their area, alongside public sector partners and other organisations who have a strategic interest in and commitment to the region. Within their partnership the balance of decision-making is at a local level, and this grouping meets regularly in southwest Scotland to discuss sustainability issues. With a reinvigorated leadership and long term funding the Biosphere, could in partnership with other existing organisations, be a suitable delivery mechanism for environmental objectives. In their consultation response Dumfries and Galloway Council have also suggested ways in which the Biosphere could be a vehicle for an achievable alternative model.

Q2b What are the advantages of your preferred alternative(s) over a National Park?

The main advantages to building on existing initiatives are local knowledge, local 'buy in', local control and local accountability.

Q3 / 4 /5 /6 If a National Park was to be designated, which of the three options presented in Map 4-1 and Table 4-1 would you support?

We strongly oppose a National Park and so do not support any of these options / alternatives.

¹⁴ 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

Q7 -18

We strongly oppose a National Park and so do not support any of these options / alternatives discussed here. We reiterate our concerns raised above regarding National Park Governance as given in Q1b above

Q20 Do you have any other comments you wish to make here which are relevant to the proposal?

We have numerous, significant concerns about the consultation process which undermines the validity and fairness the process overall.

The consultation proposes a new Park based on the National Parks (Scotland) Act 2000. At the same time Government are preparing substantial changes to this legislation in the forthcoming Natural Environment Bill¹⁵. This disingenuous presentation of the basis for the establishment of a new Park completely undermines the foundations of the current process. The current proposals¹⁶ lack clarity and do not address fundamental questions from the community. This has led to communications difficulties which have been badly managed. In addition, there are significant concerns about the capacity and capability of NatureScot as the consultation Reporter. Both the consultation process and materials are not accessible and do not meet the National Standards for Community Engagement¹⁷. NatureScot demonstrate clear bias in favour of National Parks which has had an impact on how the consultation has been designed and delivered. They have also failed to provide details of how consultation data will be analysed. When considered together these issues cast significant doubt over the validity and fairness of the process overall.

Misleading and ineffective communications

There is a distinct lack of clarity about what is being proposed, with the consultation disingenuously presented as an opportunity to create a 'new kind' of park. The legislative framework cited in the consultation document is the National Parks (Scotland) Act 2000. This offers limited flexibility, and detailed proposals would only emerge from a statutory Park Plan, developed after a park is in place. However, at the same time as consulting on this basis, the Scottish Government are proposing sweeping changes to legislation in the forthcoming Natural Environment Bill¹⁸. Full details of the Bill are not yet available however clear indicators emerge from proposals in the Biodiversity Strategic Framework consultation¹⁹. These include changes to the purpose, aims, park 'principle', duty on public bodies in the park, general powers and governance of National Parks. To consult on the basis of the current Act, at the same time as introducing major changes to this legislation totally undermines the foundations of the current process.

¹⁵ Programme for Government 2024-25: Serving Scotland 4 September 2024/25

¹⁶ <https://www.nature.scot/sites/default/files/2024-11/full-technical-consultation-proposed-national-park-in-galloway.pdf> Nov 2024

¹⁷ <https://www.scdc.org.uk/what/national-standards>

¹⁸ Programme for Government 2024-25: Serving Scotland 4 September 2024/25

¹⁹ <https://www.gov.scot/publications/tackling-nature-emergency-consultation-scotlands-strategic-framework-biodiversity/pages/5/>

The proposal also fails to provide evidence on how any new model could avoid the problems experienced in current parks²⁰. It 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 Committee²¹ 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.'*

The 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 misinformation,) has led to frustration and anger with a potential for long-term damage to community relations.²² NatureScot's response to this has been partial and inadequate. When raised directly with the Chair of NatureScot they responded to a joint letter from park proponents GNPA/APRS/SCNP but did not respond to concerns raised by others. A response from the Reporter team to concerns raised about the content of posts on the consultation portal was also lacking. Whilst some inflammatory comments were removed, others were not. This led to requests for information on the criteria used to decide what they consider to be inflammatory. Initially this went unanswered and a follow up FOI request simply repeated that they remove text considered likely to be inflammatory and stated there was *'no other recorded information to share about the criteria used.'*

Bias and failure to meet National Standards for Community Engagement

NatureScot are the statutory adviser on natural heritage to the Scottish Government and derive most of their funding from them, so their suitability to fulfil the role as an unbiased Reporter is a primary concern. Their website is filled with information asserting the value of National Parks²³ with this position clearly reflected within the consultation documents. Presentations given by NatureScot to pupils in local schools, without any prior discussion with parents, and using partial materials which only offer a positive view of National Parks have also been a source of great local concern. The natural heritage focus of NatureScot has also narrowed their view on which stakeholders should be involved. For example, there was no contact with some key services or large employers at the engagement stage of Reporter work.

NatureScot's capability to carry out their own Reporter Plan is also in doubt. They have failed to deliver a competent consultation process which meets National Standards for Community Engagement. These are Scotland's good-practice principles designed to support and inform the process of community engagement. These Standards are intended to act as a benchmark and reference for best practice and are widely accepted as key principles for effective practice, including by the

²⁰ E.g. 'The Uncomfortable Truths' LLTNP National Park Partnership Plan 2024-2029

²¹ The Scottish Parliament 30th Oct 2024

²² Multiple media reports of local opposition e.g. **Holyrood is riding roughshod over rural Scots** [Magnus Linklater](#) The Times 7/10/24, **Take a time out on plans for a new national park** Prof Roger Crofts The Times 14/10/24, BBC News 6th August 2024 Opponents launch campaign against new national park

²³ <https://www.nature.scot/professional-advice/protected-areas-and-species/protected-areas/national-designations/national-parks/value-national-parks-scotland>

Scottish Government. 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 the consultation would offer access to robust, unbiased information on the proposal. Instead, they have been presented with partial information which does not provide the detail required 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 structure, format and delivery. This includes, for example, a failure to deliver leaflets as promised, the cancellation of events during the engagement phase, use of materials which are not in an accessible format, an over reliance on digital media and a failure to effectively advertise consultation events. It cannot, therefore, be described as efficient or fair.

Inaccessible Process

From the outset there has been a heavy reliance on an online platform for communications, information provision and surveys. This is to the detriment of those who have no or limited online access. During the engagement stage many users reported that the platform was complex and frustrating to use. The interface design appeared to assume that a new National Park would go ahead and initially only offered options to comment on its scope, functions etc, with no option to indicate opposition. It was also complex and largely inaccessible for those with limited IT skills. Clearly it did not meet the needs of those with no online access. This was also an early indicator of a fundamental lack of understanding about accessibility and the need to meet individual needs to facilitate effective participation.

During the consultation stage the same platform has continued to be used. It remains the primary source of access to information, including details of the consultation meetings. This again risks excluding those with limited or no online access. If more than one member of a household wishes to submit an online survey response, they need separate email addresses and to use separate devices. The assumption that every household has online access is exclusionary, and this is exacerbated by the further assumption that every member of household can afford to have their own device. To further compound concerns those submitting a response receive no acknowledgement so are left unsure if their views will be registered.

Whilst the provision of an information leaflet to households was promised during the engagement stage, delivery was patchy, and many households did not receive one. Delivery of the more detailed consultation survey appears to have been more consistent but there are numerous problems with the format of this document. It does not adhere to RNIB clear print guidance and the map is not clear to anyone with visual impairment such as colour vision deficiency. A large print version and a clearer map was produced following requests from individuals but there is no reference to their availability either on the website or in the leaflet. An easy read version of the survey (for those with learning disability) is still not available. An initial request for a leaflet in this format was responded to with a large print version.

Scottish Government guidance on producing written information for the public states *'writing for a reading age of 9-11 years old is important as this is the average reading age for adults in Scotland.'* Readability tests carried out on sections of leaflet text using 5 different scales scored it between difficult and very difficult (college level of reading.) In addition to this only one copy of the leaflet was supplied per household and there is no freepost address or envelope for return. The cost for returning this is £1.55 (large letter,) equivalent to the cost of a basic sliced loaf and a pint of milk. For those on a limited budget this is significant. NatureScot recently indicated on their website that they may not be able to accept consultation forms posted with insufficient stamps to cover the cost.

Survey Bias

The structure of the consultation survey contained within the leaflet and available online is extremely problematic. Like other elements of the consultation there is an underlying assumption of support for National Parks. Most questions have no option to indicate opposition. For example when asking about the proposed park area the only options are to select one of the illustrated areas or 'don't know/no opinion.' As there are no guidance notes this may lead respondents to choose one of the options presented. Those whose principal view opposes a park could be completely misrepresented. When this fundamental error was raised with NatureScot the response has been ambiguous and failed to address the issue.

Their initial response stated, *'If you have indicated opposition to the proposed National Park in Q1, we will assume in our analysis that this position applies to all the other questions unless you indicate otherwise.'* When asked clarify this their explanation was equally opaque. *'By 'indicating otherwise' we mean they would say, in answer to a later question, that they – say – did not oppose that particular aspect...If they chose one of the available options in later questions, without any other text added, we would not assume they were indicating otherwise. They would need to provide additional text for us to be clear they were 'indicating otherwise.'* This appears to indicate that if a respondent selected 'don't know', in the absence of an option to oppose, but did not add text, their response would be interpreted as support for that aspect of the park. This elementary flaw undermines the validity of the data collected.

These survey questions have formed the basis for activities at the consultation events. Here some respondents have clarified their position by the addition of text. This appears to have led to changes in the response options at later events. These now include, *'none of the above - I'd prefer another option/ I don't know at this stage/ I don't want a National Park.'* This change may indicate a desire to address the inadequacy of the original format. However, it emphasises the problem for those who have already completed the survey, and the data that will be produced from this. It also raises basic questions of competence such as whether a pilot survey was carried out. Most importantly, it raises questions about data analysis, as two differing data sets are being collected.

Data Analysis and Presentation

Given the impact of organisational bias and competence on the consultation process to date, there are significant concerns about how this will affect the analysis and reporting of consultation data. This concern has been exacerbated by NatureScot's

ongoing refusal to respond to questions about the methodology being used to analyse and interpret consultation responses. Most recently, in response to a FOI request²⁴ they state, *'at this stage in the process **this is still work in progress**. We are therefore withholding this under EIR exemption Regulation 12(4)(d) - Material in the course of completion, unfinished documents, and incomplete data (EIR Regulations). We will publish details of the analysis, including the methods used, along with our advice to Scottish Government in spring 2025.'*

In social research terms to have embarked on this process without a clear methodology for data analysis is nonsensical. It indicates either incompetence, or a desire to review response data before it is analysed and weighted. This introduces the clear potential for manipulation to achieve a desired result. In addition to this consideration must be given to the way survey data will be presented. The consultation document includes a citation of evidence of support for a new National Park from a 2022 NatureScot public opinion survey²⁵. This 'indicated that 89% of people in Scotland supported the creation of a new National Park.' What the document does not make 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, just over 30 people. At the same time NatureScot chose not to include findings from their survey of young people also carried out in 2022²⁶ which placed the establishment of a new National Park as least important from a list of 14 priorities from NatureScot's Corporate Plan. When considered together these issues of data analysis and presentation, alongside those identified regarding accessibility, bias and competence cast significant doubts over the fairness and validity of the process overall.

Equality Impact Assessment – NatureScot Reporting activity

We also have concerns about the implications of the draft Equality Impact Assessment (EqIA) prepared to support the work of NatureScot as Reporter. A copy of this document was first requested in 27th November 2024, but was not supplied until 10th February. The covering email states, *'We began the EqIA process for the reporting work as part of the preparation of the National Park reporter plan which we published in August. The resulting document has remained a working draft for internal use, but we are happy to share the latest version with you.... We will make the final version of it available in May on our website as part of our report to Government.'*

The draft document states that under the Equality Act (2010) the following are protected characteristics - age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The Act places specific duties for Scottish public authorities regarding people with these characteristics. It also places a general duty on public authorities to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.

²⁴ NatureScot ref: SIR177950/A4859024

²⁵ Stewart, D. and Eccleston, J. 2023. NatureScot Opinion Survey 2022. NatureScot Research Report 1335.

²⁶ Gardner, A. and Webster, C. 2022. Youth Survey on NatureScot's Corporate Plan 2022-2026. NatureScot Research Report No. 1295.

It is positive to see an acknowledgement in the draft EqIA that, while there is a legislative responsibility to assess impact on specific groups, NatureScot also intended to assess any groups where there is evidence of adverse impact such as socio-economic status and rurality.

Whilst the full Reporting process continues until the end of April 2025, the public engagement and statutory consultation stages ran from until August 2024 to 14th February 2025. It is therefore disappointing that this document remains as a draft containing very little detail of actions undertaken to ensure Reporting work on these two stages would meet the requirements of the Equality Act or address any adverse impact of socio-economic status or rurality.

There are several very general statements about engagement with, 'other local and national stakeholders', 'networks' and 'businesses operating in the proposed area,' But no indication of who these stakeholders, networks or businesses are. There are also repeated references to, 'existing EDI networks' but again no detail of which networks or how they would be involved. Overall, this assessment reads more like a tick box exercise completed to meet a statutory duty, rather than a tool which would assist the Reporter to eliminate discrimination by addressing specific needs.

Indeed our review of the consultation process (above) demonstrates there is little evidence that either the needs of specific groups, such as disabled people, and more generic issues of socio-economic status and rurality have been addressed. Instead this review offers comprehensive evidence on the failures to meet National Standards of Community Engagement. It also indicates that NatureScot have given scant attention to their general duty to have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations.