



Copy of email from Liz Hitschmann, No Galloway National Park co-founder

To: Mairi Gougeon

Sent: Tuesday 18 March 2025

Dear Ms Gougeon,

We understand that it is your intention to stand down at the next election and we wish you well for whatever plans you have for the future. This being the case, we feel it would be a shame to detract from your many achievements in the post and urge you to abandon the establishment of a third national park at this time.

Through no fault of yours, the process has been flawed from the start. One of the criteria in the for the establishment for a new national park, was for the nominees to demonstrate strong local support, Galloway National Park failed to do this and the fact that the Appraisal Report accepted a poll of just 195 people as evidence of “extensive public support” should really have raised alarm bells. The consequence of this oversight has caused untold damage to our communities which will only worsen if the national park is imposed on us.

The consultation process has also been deeply flawed and I attach a copy of our report on the consultation. We spoke with Paul Nelis of Scottish Community Development Centre (SCDC) last week, they have been commissioned by NatureScot to carry out an independent review of their consultation, which suggests to us that NatureScot is aware of possible ramifications from a flawed process.

It is also clear to us that the terms of the Natural Environment Bill dictate how national parks and other connected public authorities should operate, making a mockery of the claims that this would be a park made by the people and for the people of Galloway. You will see from our report on the consultation how this fact further negates the work of NatureScot.

As already stated, this is an extremely divisive issue in Galloway, and we strongly feel it would be irresponsible for the Scottish Government to rush through such a drastic change to our way of life in the midst of the uncertainty of an election year, especially as this was never a SNP commitment in the first place.

We therefore urge you to use the opportunity of your impending retirement to call a halt to the process.

Yours sincerely,

Liz Hitschmann

Copy of email from Ann Purvis, No Galloway National Park campaigner

To: Mairi Gougeon

Sent: Wednesday 19 March 2025

Dear Ms Gougeon,

I am writing to express significant concerns about the impact of the Natural Environment Bill on the consultation process. This follows on from my previous correspondence expressing concerns about the process, including the work carried out by NatureScot, in their role as Reporter. Whilst I appreciate that a review of this work is ongoing, I believe it demonstrably falls short when reviewed against Scottish Government's own consultation guidance including the UK Government's 11 principles of good consultation and the Gunning Principles which are minimum legal standards for a consultation to be deemed a fair and worthwhile exercise. It also believe it falls short of good practice standards, the National Standards for Community Engagement. Taken together these failures seriously undermine the basis for the Reporter's advice to the Government arising from the process to date. These failures have been compounded by the publication of the Natural Environment Bill, less than a week after the closing date for the statutory consultation. This consultation was based on the National Parks (Scotland) Act 2000 and the new Bill proposes numerous changes to this, including the aims of National Parks and the way they are run.

The statutory consultation proposal clearly stated this Act provides, 'the ground rules for all Scotland's National Parks.' So, in effect the Government were seeking views on the basis of the Act, at the same time as they were planning changes to it. These changes were not published until after the consultation closed. As you have acknowledged the Bill proposes changes to the aims of National Parks and the way they are run, including:

- Amending National Park Aims
- Strengthen the existing duties on public sector bodies operating within National Parks
- Introduce new powers to set up a fixed penalty notice regime for the contravention of National Park byelaws and
- Amending the Land Reform (Scotland) Act 2003 to enable any future National Park to become the access authority for its area.

You have also stated the existing powers to designate a new National Park under the 2000 Act and the designation process are not affected by the new Bill. On that basis you claim, 'we do not envisage any issues with the Bill being considered by Parliament at this time.' In other words, you appear to be expecting our community to accept that Government can, behind the scenes of a statutory consultation, change the legislative basis which sets out the 'ground rules' for the proposal under consideration.

Whilst the powers and process for designation may not have changed, much of the substance of what the community were being asked to give their view on looks likely to. The timing of the publication of the Natural Environment Bill, less than a week after the consultation closed, demonstrates how little regard the Scottish Government have for the views that have been offered.

Your faithfully,

Ann Purvis