

## Creating new National Parks in Scotland – a rudderless government

### Description

On Thursday, the Scottish Government's Biodiversity Minister, the Green MSP Lorna Slater, who also has responsibility for National Parks, launched a consultation ([see here](#) for news release) on creating a third National Park in Scotland. It is to credit of the Greens that they have forced the Scottish Government to reverse their longstanding opposition to the creation of new National Parks as a price for power sharing, even if the cost of national parks (£4-6m) is peanuts in the scheme of things. This should provide an opportunity to put National Parks, which could have been playing a key role in tackling the climate and nature emergencies, back into the political spotlight. Unfortunately, almost everything else about the launch of the consultation suggests that the Scottish Government has very little idea about how National Parks could make a real difference.

### The absence of any vision

Civil servants know that politicians love being seen to plant trees, especially with school children. This is an activity that symbolises concern for nature and hope for humanity and Ms Slater duly launched the National Park consultation at Luss Primary School where pupils have been involved in *"a local COP 26 legacy tree-planting project."*

While the importance of hope should not be underestimated, dozens of similar projects have taken place in primary schools across Scotland, including urban areas. They are clearly neither intrinsically connected to nor a consequence of National Parks nor will they make more than a tiny contribution to tackling the nature and climate emergencies.

By an amazing coincidence, this was illustrated by another report in the Herald on Friday involving another Scottish Government minister. While on page 9 Lorna Slater was calling for views on the location of a new National Park, on page 13 Mairi McAllan, the Environment Minister, was featured talking (at the Institute of Chartered Foresters conference and at the end of National Plant Health week) of the growing destruction being caused to trees by diseases.







Ash dieback near Ben Ledi car park 21st August 2021. A high proportion of the ash trees in the broad-leaved woodland around Loch Lubnaig now appear to be dying.

There are an estimated 10.5 million ash trees in Scotland, covering about 13,500 hectares, which now risk being killed off by ash dieback ([see here](#)). On top of that we have all the larch being felled because of phytophthora ramorum, the elm that have already gone etc etc.

Primary school children planting a few trees is never going to compensate for these disasters, many of which have been created by the forestry industry, although it might be a good idea for them to plant ash. So what are our National Parks actually doing to show how we might tackle the problem?

Instead of visiting school children in Luss, Lorna Slater could have visited one of the many places in the Loch Lomond and Trossachs National Park that illustrates the big issues that National Parks need to tackle. But that would have required imagination and a determination to take on the vested interests that continue to manage the land in such disastrous ways.

## **A consultation that omits the historical context**

The consultation ([see here](#)) has been launched without any account of the history behind Scotland's National Parks or the work that been done in the past to identify areas for new National Parks. That work may not have always got it right, but the consultation doesn't even mention it let alone set out why it believes the recommendations of the past may no longer be relevant.

There is an excellent summary of the history in [Unfinished Business](#), a National Parks Strategy for Scotland, produced by the Scottish Campaign for National Parks (SCNP) and the Association for the Preservation of Rural Scotland (APRS) in 2013. This includes maps of the areas that have in the past been recommended for new National Parks including: the Ramsay Committee 1945; the Countryside Commission for Scotland 1990; the Coastal and Marine Parks recommended by the Scottish Executive 2006; as well as those recommended by SCNP and APRS in that report (declaration, I am a member of SCNP and served for a time on their Committee).

There was no need for the Scottish Government to reinvent the wheel or do much work to provide consultees with some basic context but they have failed to do so.

## **The achievements of Scotland's two National Parks?**

Nor is there anything in the consultation – it's just a single page of A4 – of what Scotland's two National Parks have achieved to date. Lorna Slater – or at least the civil servants writing her news releases – claim *"they have become the jewels in Scotland's crown"*, a terrible cliché but importantly one that is not based on any evidence.

Where are some good examples of conservation going on in Scotland's National Parks most of these, for example the Cairngorms Connect project and the regeneration that is happening at Mar Lodge, owe little or nothing to Scotland's National Park Authorities. Set against these positive examples are all

unsustainable land-management practices which have continued at a landscape scale since our National Parks were created 20 years ago: industrial forestry; intensive grouse moor management; continued overgrazing by high numbers of sheep and red deer; and the destruction of wildlife and landscape that has gone along with them.

The natural environment in our National Parks is generally in a disastrous state. This has now been recognised by the Loch Lomond and Trossachs National Park Authority (LLTNPA) which has now appointed yet another manager ([see here](#)), a “Future Nature Development Manager”, to try and stop the decline by 2030. The job title is horrible – humans need to create space for nature not attempt to “develop” it – but the new incumbent had an Agenda piece in the Herald, also on Friday ([see here](#)), timed no doubt to come out with the launch of the consultation. This provides an important admission, even if this is couched in the usual spin and fails to mention the industrial forestry which blights so much of the National Park:

*“Protected areas like national parks are not immune to this global crisis and even here in Loch Lomond and The Trossachs, nature as a whole is in real trouble.*

*Pressures from over-grazing, pollution, invasive non-native species and a rapidly changing climate mean that many of the national park’s iconic habitats and species are in danger.*

*Despite our collective efforts to date, vitally important native woodlands are under-represented in the park and up to 10,000 hectares of peatlands are degraded and emitting greenhouse gases.”*

Set aside the fact that those collective efforts have often been lamentable ([see here](#) for forestry example) or entirely lacking ([see here](#) for landslips). Or that many of the failures of the LLTNPA have nothing to do with global issues but rather result from their failure to tackle how land is managed locally. The key point is that the position of nature in the National Park has got worse, not better, since it was created.

It’s little different when it comes to the position of jobs, housing and the management of outdoor recreation.

## **The purpose of the consultation**

*“We are committed to establish at least one new National Park in Scotland by the end of this Parliamentary session in 2026. To be able to do this in an open and transparent manner, we need to be able to assess any new area which is to be considered for National Park status against a set of agreed expectations.*

*“This is where we need your help and ideas. We want to gauge what people want their National Parks to deliver for the environment, culture and the communities within their boundaries. I would strongly encourage everyone to take part and ensure your views are heard and reflected in the shaping of this historic expansion of Scotland’s National Parks.”* (Extract news release).

The “challenge will be live until 5pm on 3rd June 2022”. That gives just over two weeks for “everyone to take part”. The idea that the Scottish Government will be able to gauge what people want “their National Parks to deliver”

in just over two weeks is laughable.

The news release claims that “*no criteria for selecting National Parks exist other than the limited statutory criteria on the face [sic] of the [National Park \(Scotland\) Act](#)*”. That is highly misleading. The criteria in the National Parks Act was good enough to select Scotland’s first two National Parks and then extend the boundaries of that in the Cairngorms to cover Perthshire:

## **2 National Park proposals**

- (1) The Scottish Ministers may, if it appears to them that the conditions in subsection (2) are or may be satisfied in relation to an area, propose—
  - (a) the designation of the area as a National Park, and
  - (b) the establishment of an authority (to be known as a “National Park authority”) to exercise, in relation to that Park, the functions conferred on the authority by virtue of this Act.
- (2) Those conditions are—
  - (a) that the area is of outstanding national importance because of its natural heritage or the combination of its natural and cultural heritage,
  - (b) that the area has a distinctive character and a coherent identity, and
  - (c) that designating the area as a National Park would meet the special needs of the area and would be the best means of ensuring that the National Park aims are collectively achieved in relation to the area in a co-ordinated way.
- (3) A proposal under subsection (1) must be in writing and must set out (in general terms)—
  - (a) the area which it is proposed should be designated as a National Park, and
  - (b) the functions which it is proposed the National Park authority should exercise.
- (4) Such a proposal is referred to in this Act as a “National Park proposal”.

In my view the criteria are very clear, the area needs to be of national importance for its natural or cultural heritage, to have a coherent identity and the creation of a National Park must be able to meet meet the “special needs of the area”. That means the functions of the National Park, as set out in para 3, must be appropriate for the area concerned (hence why the Scottish Parliament gave the Loch Lomond and Trossachs and Cairngorms National Park Authorities different planning powers).

In failing to explain this clearly, the Scottish Government has abdicated responsibility but also undermined the usefulness of the initial consultation. If you look at the ideas submitted to the consultation so far ([see here](#) again) they include suggestions that the M8/M9 corridors, Glasgow, Carron Valley, Pentlands and East Neuk/landward parts of Fife should be considered for National Parks. These proposals are all well motivated and I agree with the sentiments of the authors but these areas are NOT of national importance. In my view they would be far more suitable for Regional or Country Parks but as I explained in my [post](#) on the Pentlands 18 months ago, the Scottish Government and local government in Scotland have allowed those parks to collapse in the wake of austerity.

Having stirred up all these suggestions, how the Scottish Government will judge the case for new National Parks on the basis of “*agreed expectations*” is unclear. What is very clear from looking at the consultation responses so far is that there are NO agreed expectations.

A coherent consultation on new National Parks would have clearly situated them not just within the historical context within a wider framework that included the place of Regional and Country Parks and countryside management, included protected nature sites, more generally.

The consultation might also have usefully asked some questions about whether the current criteria for the selection of National Parks needed to change and if so how. For example, at present National Parks are intended to cover areas that are outstanding for their natural heritage, both landscape and wildlife. But given that the decline of nature in Scotland has been so disastrous, arguably there are very few areas – as distinct to specific places such as nature reserves – that are outstanding for nature. There is therefore a strong argument for designating an area as a National Park not because of its current wildlife but because of the potential it offers for wildlife to be restored.

The suggestion Ron Greer made on parkswatch six years ago for a Monadhliath wildlife refugium comes very close to that ([see here](#)). The main functions of a National Park Authority in such an area would be on changing how the land is managed, which would almost certainly require them to buy out private landowners. There is already a precedent for designating land because of its potential in Scotland: the Great Trossachs Forest National Nature Reserve was created 10 years ago to restore native woodland and the species that depend on it rather than for the wildlife that could be found there at the time ([see here](#)).

## **An opportunity to create National Parks that are fit for purpose**

My view, and I said this to SCNP when I served on their Committee, is that there is no point in creating new National Parks in Scotland unless at the same time we sort out the reasons why existing ones are failing.

While that is not explicitly addressed by the consultation, in asking the public “*what these areas should deliver in future*”, there is some room to draw on the experience of Scotland’s existing National Parks. In my view the Scottish Government should be learning from why our two existing National Parks have largely failed people and nature to date, including the matters that have been outside their control, and then set out proposals to rectify this in a new National Park and reform our existing ones. This should include amending some of the legislation that is now very out of date, including the provisions for local member elections I considered recently ([see here](#)), but needs to go much wider than that and look at how National Parks could start to address issues such as landownership.

The Greens, in forcing the Scottish Government to commit to a new National Park, have created a much wider opportunity to consider the role that National Parks could play in tackling the climate and nature emergencies, creating sustainable rural jobs, enabling visitors to enjoy the countryside etc. That provides a welcome opportunity and, in the absence of any government commitment to do the same, I hope to respond by developing a set of proposals for how National Parks might be reformed to stimulate further thought and debate.

## **Category**

1. National Parks

**Tags**

1. climate change
2. CNPA
3. Deer
4. landed estates
5. LLTNPA
6. planning
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