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## Landscape Charities welcome progress towards the designation of more National Parks in Scotland

### Introduction

APRS and SCNP welcome the recently published "[National Parks Advice to Ministers - February 2023](#)" produced by NatureScot. The report represents a big step towards commencing the selection process for new National Parks which is expected to open for nominations in Autumn 2023.

### SUMMARY

- 1. We recognise the depth of public support for protecting Scotland's wealth of beautiful and iconic landscapes and for much more to be done to address the climate and nature crises - and the potential for National Parks to help achieve these ambitions*
- 2. We welcome the recommendation that Scottish Government should consider expanding the suite of National Parks in Scotland before 2030 beyond its current commitment*
- 3. We support the view that the designation of one or more new National Parks should take place by 2026 under the current legislation alongside the proposed new (non-statutory) national statement on National Parks*
- 4. We welcome the recommendation that the integrated approach to people and nature should remain at the heart of Scotland's National Park model and that the existing four National Park aims should be retained with some potential amendments*
- 5. We agree a clearer policy steer is required from Scottish Government on current and future large-scale renewable energy proposals coming forward now and in the next few years and on how these can be managed alongside the selection of new National Park areas*
- 6. We welcome progress towards establishing a user-friendly and effective nominations process to inform selection of new National Parks and look forward to that process starting later in 2023.*

### MORE NATIONAL PARKS

The NatureScot Advice followed an extensive consultation and engagement process and the findings from that indicate a significant appetite for more National Parks amongst the Scottish public which is mirrored by the results of NatureScot's latest Nature Omnibus survey<sup>1</sup>. This found 89% of the Scottish population support the creation of new National Parks and only 3% are opposed.

We welcome the recommendation made that the Scottish Government should consider expanding the suite of National Parks by 2030 beyond the current commitment to include

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<sup>1</sup> NatureScot unpublished - referenced in [National Parks Advice to Ministers - February 2023](#)

more than one new National Park by 2026 *and* a shortlist of other areas for future consideration. The role of National Parks as exemplars, demonstrating how the whole of Scotland can move to being a nature positive and net zero nation will have a greater reach if a wider range of its diverse and iconic landscapes are represented within the designation. We agree that a coastal and marine National Park or Parks should be an early priority. Building on the current commitment to more National Parks should also reassure supporters of a potential National Park area that completing the nominations process is a worthwhile exercise rather than a competition for a single designation even if the support for a National Park in that area is only starting to gain momentum.

We strongly support NatureScot's view that if proposals for legislative changes will potentially delay the designation of new National Parks by 2026, then the designation process should be undertaken under the current legislation alongside the proposed new (non-statutory) national statement. Designation of new National Parks will be an indication of steps towards a just transition being taken, not just talked about and may be heartening to the large proportion of the population who are increasingly anxious about the climate and nature emergency.

### THE APPROACH TO NATIONAL PARKS IN SCOTLAND

SCNP and APRS welcome NatureScot's view that the integrated approach to people and nature should remain at the heart of Scotland's National Park model to help realise a just transition. These are special landscapes enjoyed by all where nature-based solutions and sustainable management can allow nature and people to flourish whilst doing more to demonstrate the urgent transition required to mitigate and adapt to climate change.

We are supportive of the proposal to prepare a national statement to clarify the policy direction for National Parks, whether or not legislative changes are made to the relevant legislation in the next few years. It seems important to avoid any confusion over the future purpose and aims of National Parks in the lead up to, and during, the forthcoming nomination and selection process so that its success and smooth running is not jeopardised. The natural and cultural elements of these special landscapes, and the synergies between them should be recognised and inform future land management and any changes required to achieve the National Park aims.

We agree that a particularly important element of the debate to date has been around the potential role of National Parks in providing exemplars for the action needed for nature recovery and a just transition to net zero and that additional National Parks should increase the effectiveness and relevance of this as well as accessibility. The importance of this role in terms of showing the benefits of a just transition to net zero for local communities should perhaps also be emphasised including increasing both environmental sustainability and social-economic benefits. We would also like to see the role of National Parks as exemplars for visitor management highlighted further.

We strongly support the proposal that National Park Partnership Plans should be endorsed by Ministers from across relevant portfolios to aid necessary policy integration and ensure national funding streams positively facilitate the priorities identified in them.

### REFRESHING THE ROLE OF SCOTLAND'S NATIONAL PARKS

We are supportive of the proposals to clarify the increased contribution from National Parks, and the leadership role expected of them, in addressing the climate and nature

crises. We also strongly support the recommendation to retain all four existing aims with some modifications.

Of the elements of leadership and action to deliver transition to nature recovery and net zero (para 3.5) we are pleased that the role of placemaking to achieve optimum outcomes for communities, nature and landscapes is highlighted along with the urgency of accelerating the transition in the land and marine use that is required to deliver climate mitigation and adaptation and nature recovery. We would also support the recognition that nature recovery should be inspired and informed by the past but not seek to simply replicate it.

We welcome acknowledgement of the importance of the “balancing duty” in the legislation which requires greater weight to be given to the first of the existing National Park aims by the National Park Authority to reduce detrimental loss to the natural and cultural heritage. Given the greater emphasis on climate and nature recovery it is understandable that NatureScot have proposed an amendment that a greater weight should be focused on natural heritage rather than natural and cultural heritage combined. We recognise that arguments about traditional cultural practices might potentially be deployed to support continuing activities that are damaging in terms of emissions or biodiversity impacts e.g. practices of sporting estates. However, we feel the biodiversity or climate impacts should be enough to refute such arguments if appropriate. We are uncomfortable with the downplaying of the cultural dimension of Scotland’s protected landscapes, which can encourage public interest and support for better stewardship of them. In addition, consideration of the cultural heritage can help ensure that National Parks reflect and capture all the attributes that make the areas/landscapes special. As there is also a proposal to update the definitions of both natural and cultural heritage as used in the legislation, it remains to be seen exactly what the implications of all the changes combined will be.

We welcome the proposal to increase accessibility by amending the wording of the third aim.

We recognise that any changes to the statutory aims of National Parks must be done with great care, but amending the legislation also gives an opportunity to consider the duties on other public bodies exercising functions with a National Park and to strengthen these so that they are required to positively support the delivery of National Park Plans and the ‘balancing duty’.

We look forward to seeing the final proposals for the refreshed wording of the National Park aims, the definitions of natural and cultural heritage and the duties on public bodies

### THE SELECTION PROCESS FOR NEW NATIONAL PARKS

We agree with NatureScot’s view that the key elements of the selection process have been identified and that the nominations process should be kept relatively simple. We recognise that duplicating much of the work of the Reporting stage of the statutory designation process would not be a worthwhile use of resources. We also agree with NatureScot’s emphasis on the need to use clear and easily understood language.

We are generally supportive of the proposed independent expert panel to review the nominations process and make recommendations for Ministers but recognise given the nature of the exercise that it will be important to achieve a balance of interests and expert

knowledge within the panel and this will require great care. We look forward to seeing further details of the evaluation of the nominations in due course.

We agree that nominations should draw out an area's potential strategic contribution to national goals if it were to become a National Park as well as highlighting the benefits that the designation and the setting up of a National Park Authority would bring to the area.

NatureScot are right to highlight policy areas that require further consideration in relation to new National Parks, including marine planning and Renewables. On large-scale renewable energy proposals and related infrastructure, whilst it is not realistic to have a moratorium everywhere, a more strategic approach seems urgently required and needs to address the forthcoming selection process for new National Parks and the areas involved.

A policy area which perhaps understandably is not really covered in the NatureScot Advice , and is certainly not unique to National Parks, but which will continue to be crucial to local communities is the requirement for local housing needs to be met. It would be helpful to consider the extent of the role of National Park Authorities in helping to address this.

## NEXT STEPS

The publication of NatureScot's Advice on National Parks is a welcome step in the process leading to the designation of more National Parks in Scotland. We are sure it will inform the next stages of the Scottish Government's work to achieve this. We anticipate increasing public interest in the process as it moves towards the selection phase, but recognise that there will be further stages of consultation on firm proposals - including for any legislative changes and the proposed new National Statement and details of the selection process itself - from the Scottish Government before this can happen.

SCNP and APRS have long campaigned for more National Parks and the benefits they could bring to Scotland. Our publication of "Unfinished Business" in 2013 which helped to re-invigorate the debate, also proposed seven areas of Scotland widely considered as having landscapes worthy of designation. However, it is not regarded as an exclusive list, and in a country with such diverse and widely admired landscapes we hope these and other areas will be put forward for consideration for designation once the nominations process begins, later in 2023.

## SCOTTISH NATIONAL PARKS STRATEGY PROJECT

APRS and SCNP have campaigned together for additional National Parks for Scotland for more than a decade and you can find more information on the campaign here:

<https://aprs.scot/campaigns/national-parks/>

**SCNP** - [The Scottish Campaign for National Parks](#) - promotes the protection, enhancement and enjoyment of National Parks, potential National Parks and other nationally outstanding areas worthy of special protection. SCNP is a registered Scottish charity, No SC031008.

APRS - [The Association for the Protection of Rural Scotland](#) is Scotland's Countryside Charity (registered Scottish charity, No SC016139). We campaign to protect, enhance and promote Scotland's countryside and rural landscapes for everyone's benefit, and we support others to do the same.

