



## **Consultation response: New National Parks – appraisal framework**

### **Question 1: Do you agree that 'outstanding national importance' should be a criterion for assessing nominations for new National Parks?**

Agree.

It would be helpful for the components to be more clearly defined. They are very vague as drafted. For example, for component 1 more information could be provided about the ecological criteria that would constitute natural heritage of national importance.

### **Question 2: Do you agree with the components of criterion 1 (outstanding national importance)?**

Component 1: Agree

Component 2: Agree

### **Question 3: Do you agree that 'size, character and coherence' should be a criterion for assessing nominations for new National Parks?**

Agree

### **Question 4: Do you agree with the components of criterion 2 (size, character and coherence)?**

Component 1: Agree

Component 2: Agree

### **Question 5: Do you agree that 'meeting the special needs of the area' should be a criterion for assessing nominations for new National Parks?**

Agree

There must be a balance of local interest with national interest within the National Park. This includes working with communities to ensure their sense of place is not negatively impacted, for example through increased traffic, tourism numbers, housing development, or infrastructure development. A Just Transition must mean that communities must receive benefits from nature positive and net zero actions within the park boundaries. There is potential involvement for communities at all levels of National Park activities e.g. board membership, inhabitants, workforce, volunteers, visitors, students.

For example, a well-designed, community-supported Coastal and Marine National Park with the aim of nature restoration could have enormous positive impacts on both nature and local communities. Unsustainable expansion of industry, destructive fishing methods, climate change, pollution and inadequate protections have severely impacted their health. In 2019, the UK Governments collectively failed to meet 11 out of 15 key marine targets for achieving 'Good Environmental Status', and Scotland's Marine Assessment 2020 paints a stark picture of ongoing concern about the health of seabed habitats and marine wildlife populations. Yet our seas are a vital resource for humans- including as a source of food, jobs, carbon storage, water purification and protection from flooding. In the right location, with community support and integrating with existing marine conservation



commitments in the Bute House Agreement, a Coastal and Marine National Park could help protect and enhance these key ecosystem service benefits, in turn helping deliver sustainable development and inshore marine planning benefits for local communities and businesses.

**Question 6: Do you agree with the components of criterion 3 (meeting the special needs of the area)?**

Component 1: Agree

Component 2: Agree

Component 3: Agree

Component 4: Agree

Component 5: Agree

This criteria is based on wording of the current Act. We understand there is an emphasis on the justification for the investment in a National Park under the "added value" components in criterion 5. We did notice that the draft nominations form (Annex A of the 'nomination process and draft appraisal framework' doc) only has 5 questions so this perhaps reflects the overlaps between some of the 7 criteria, and particularly 3 & 5. How will the scoring system address the potential duplication (double scoring?) of the criteria?

**Question 7: Do you agree that 'visitor management and experience' should be a criterion for assessing nominations for new National Parks?**

Agree

How much a NP can achieve in areas like transport depends on the powers that it is given and the degree to which it can influence the priorities and decisions of other public bodies. the resources it receives will inevitably affect how effective it can be in delivering even its core functions.

How are these weighted between competing bids? Would this be about managing areas with current visitor pressures vs. areas that have potential for growth?

Component two would be an ongoing process of improvement and investment. Once you have National Park status you would be constantly refining.

**Question 8: Do you agree with the components of criterion 4 (visitor management and experience)?**

Component 1: Agree

Component 2: Agree

Component 3: Agree

Component 4: Agree



**Question 9: Do you agree that 'added value' should be a criterion for assessing nominations for new National Parks?**

Agree

**Question 10: Do you agree with the components of criterion 5 (added value)?**

Component 1: Agree

Component 2: Don't know

It is not clear what information this component would gather that isn't captured under Criterion 3.

**Question 11: Do you agree that 'local support' should be a criterion for assessing nominations for new National Parks?**

Agree

Component 1 doesn't mention "residents" which is concerning.

**Question 12: Do you agree with the components of criterion 6 (local support)?**

Component 1: Agree

Component 2: Don't know

How will scoring work? Wholehearted LA support (while ideal) should not be required for a nomination to succeed - if this had been the case historically far fewer NPs would have been designated across the UK. Lack of, or limited support may be because the nomination is quite a novel idea or because there are several potentially competing bids within a LA area i.e. a capacity or timing issue rather than a considered objection. It will however, be useful for the process to clarify this.

**Question 13: Do you agree that 'strategic contribution' should be a criterion for assessing nominations for new National Parks?**

Agree

Hopefully this criterion captures the role of NPs as exemplars, and how an increased number of NPs covering different landscape types could demonstrate leadership on how rural Scotland could move to being nature positive and net zero in a fair and planned way.

**Question 14: Do you agree with the components of criterion 7 (strategic importance)?**

Component 1: Agree

Component 2: Agree

Component 3: Agree

Component 4: Agree

Component 5: Agree



**Question 15: Once finalised, the appraisal framework will include details of how each criterion will be scored. This will be published ahead of the nominations process being launched. Do you have any comments that you would like to make about how the selection criteria should be scored?**

Scottish Environment LINK's Land Use and Land Reform Group are supportive of the criteria outlined in this consultation. However, the consultation does raise questions over how the criteria would be weighted and it would be useful to be able to respond to a Scottish Government proposal on scoring at this stage. A weighted scoring system would perhaps reflect uncertainties and potential duplication between criteria - it should also presumably reflect that NPs are about celebrating, protecting and enhancing Scotland's finest landscapes but in doing so can serve other very important purposes.

The previous consultation proposed changes to the statutory Aims of National Parks. LINK members expressed our support for the introduction of an overarching purpose to secure nature recovery and a just transition to Net Zero. Assuming that these proposals are taken forward, the scoring for criteria should reflect these priorities.

Specifically, it is important that any new National Parks are of sufficient size from an ecological perspective to enable nature restoration and protection at an effective scale. Any new Parks should also contribute towards ensuring that the suite of national parks covers a broad range of ecosystems and habitats.

Under Criterion 4, there is an inconsistency in language with some components listed as "could" and some as "would". It is not clear if this reflects likely weighting. Under the second component of Criterion 4, no indication is given over how managing existing visitor pressure would be compared against areas of potential visitor growth.

At the appraisal and selection stages we are likely to be comparing areas with quite different qualities. The legislation is framed to allow this and choosing new NPs will ultimately be a political decision. So although clarity is needed on how scoring will be weighted, it should be made clear that scoring is an aid to decision making but not determinative.

**Question 16: Do you have any other comments that you would like to make about the draft appraisal framework and nominations process for new National Parks?**

The process would benefit from clear timetables and greater clarity of the relationship between designation of new National Parks and reform of National Parks overall. There is still a degree of concern about the uncertainty of future changes to NP legislation, which could affect the confidence of those considering nominating an area. LINK recognises the opportunities in reforming NPs to ensure that NPs can take more of a leadership role in delivering a Just Transition to Net Zero and Nature Positive and supports these changes, which we believe will ensure National parks are delivering for nature, climate and people long into the future. We therefore advise the Scottish Government to ensure that the process is carefully managed and communicated, particularly to groups and individuals preparing bids.

There is a concern over the timing of potential changes. The consultation paper states that there will be further consultation later this year. If the nomination process starts in October that doesn't leave much time to understand and communicate planned changes.

As in any competitive situation there is a risk of acrimony over the outcome. This makes it all the more important for the process to be as fair and transparent as possible and (as the Scottish Government has suggested it will) to consider the scope for identifying positive alternatives for unsuccessful nominations - either in the form of designation of further NPs in later years or of other mechanisms/initiatives.



Component 1 of Criterion 6 lists a range of potential bodies that would demonstrate support, but omits local residents as a group distinct from community bodies.

The guidance for nominations lacks a definition of “progressive land use”.

The proposed nominations form has 5 questions, the answers to which will be assessed for the 7 criteria and scored. It would be useful for there to be clarity as to how answers will be scored against the criteria.

This response represents the collective view of LINK’s Land Reform and Land Use Group. Members may also respond individually in order to raise more detailed issues that are important to their particular organisation. This response is supported by the following LINK member organisations:

Action to Protect Rural Scotland  
Amphibian and Reptile Conservation  
Buglife Scotland  
Ramblers Scotland  
RSPB Scotland  
Scottish Campaign for National Parks

Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 35 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

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