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**Mairi Gougeon MSP**  
**Cabinet Secretary for Rural Affairs, Land Reform and Islands**  
**Scottish Government**

25<sup>th</sup> June 2025

Dear Cabinet Secretary,

We are writing to you following the announcement on 29<sup>th</sup> May that the Scottish Government will not pursue the proposal to designate Galloway and Ayrshire as a National Park.

Scottish Environment LINK members support National Parks and believe that National Parks can play a valuable role in tackling the climate and nature emergencies, alongside other responsibilities. LINK members are concerned by the process through which a decision was made regarding the proposed National Park in Galloway and Ayrshire.

Having stated that the Scottish Government would not be holding a referendum on the proposal in November 2024, we were surprised when consultation figures were used in this manner within the public announcement. NatureScot's advice report indicates the unreliability of the consultation response figures, particularly with the potential for multiple counting, and that the consultation was methodologically not intended as a referendum. In addition to this, the provision of supporting evidence within consultation responses appears to have not been adequately taken into account when considering arguments for and against the proposal.

With regards to the role of NatureScot in the decision-making, LINK members are disappointed that the advice from NatureScot in its capacity as statutory advisor on natural heritage (separate to their advice as Reporter) was not further considered. In their advice, NatureScot support progressing a future National Park in Southwest Scotland around a 'Core Area' (specified in their letter dated 5<sup>th</sup> May 2025). This area, they note, is already largely in government ownership and has a strong degree of 'coherence and identity' that would lend itself to future designation as a National Park. We are disappointed that this option is not being further considered and also feel that the consultation process would have benefitted from such contributions being produced prior to the official Reporting process.

The conflicting advice from NatureScot, we believe, is indicative of the significant ambiguity around the process by which National Parks are currently proposed and designated. We suggest that this lack of clarity in process needs to be addressed in order to make the process more accessible for citizens and stakeholders, as well as limiting the potential for misinformation and social polarisation. LINK members believe that Part 3 of the Natural Environment Bill offers a valuable opportunity to strengthen the current statutory process for proposing and designating National Parks.

We recommend the following amendments that we suggest would make the proposal and scrutiny of new National Parks more effective and constructive:

- 1. Scottish Government should produce guidance on how a suggested area has to meet the criteria in the 2000 Act.** The suggested new guidance would mean that the pre-selection process does not have to be re-invented for each potential proposal, thus shortening the time taken for a suggested area's consideration. Furthermore, the first iteration of the guidance could build on and formalise the work undertaken in 2024 by the Scottish Government to create and publicly consult on the bespoke evaluation criteria used for assessing bids.
- 2. At the point that Scottish Ministers formally propose a new National Park and set the Reporting process underway, a much firmer vision of the National Park they are proposing should be published.** We suggest that at this point of proposal, Ministers should have to include in the written proposal in the form of either an early draft designation order or at least clear information covering most or all the required content for a draft designation order. This should be produced in an accessible format. This would not stop the public consultation stage of the Reporting process in considering alternatives, e.g. boundary, functions, governance etc., but it would give a firmer and more coherent proposal from the outset. This would hopefully limit the likelihood of misinformation campaigns and local confusion.
- 3. The Role of the Reporter.** Further consideration needs to be given to which public body carries out this role in terms of expertise and resources. The 2000 Act suggests NatureScot, but it already allows for alternatives. If more research and preparation by public bodies or government advisors has gone into the preparation of a National Park Proposal before the reporting stage starts (as suggested above) then it may be more appropriate to choose a different Reporter with specialist skills in conducting inquiries or processes that are less at risk of accusations of bias. The Reporter should be required to produce its recommendations independently, and their recommendations should be weighed against evidence of the public benefit.

In addition to the above recommendations, LINK members wish to express our unease about the decision not to proceed with the proposal for a new National Park in the context of the concurrent climate and biodiversity crises. Clearly, for a National Park to be effective, local and national knowledge, support and engagement is needed. However, given that the designation of at least one new National Park was listed as one of the actions within the Scottish Biodiversity Delivery Plan, we are concerned that the over-reliance upon local volunteers to make the case for a new National Park in a fraught political environment does not reflect the support nor leadership needed to effectively deliver for climate and nature.

We hope you find our recommendations to improve the proposal and designation process useful, and we would be very eager to discuss these further with you.

Yours sincerely,

Dan Paris  
Director of Policy and Engagement  
Scottish Environment LINK



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