

## **A NATIONAL PARK IN GALLOWAY: A DISCUSSION PAPER**

### **RESPONSE BY ROGER CROFTS**

#### **Key points**

It is healthy to have a debate about the future of the economy, community and land use of Galloway and the wider area. But the discussion paper falls very far short of a rounded overview of the issues and the possibilities and homes in on a specific solution without considering real alternatives.

The discussion paper:

- fails to look adequately at other options and mechanisms,
- fails to demonstrate the linkage between a national park and the benefits to the primary purpose of nature and cultural heritage conservation (see Section 9 (6) of the Act,
- presumes without any evidence that a park authority could be influential in resolving some of the land use conflicts of the area,
- assumes that a national park is the best way of resolving the economic disadvantages, the physical and perceived isolation of the area, and the poor demographic structure, and
- fails to recognise the contribution which the proposed Scottish Government South of Scotland Development Agency will make.

This places on a national park authority, if it were ever established, an impossible task of solving all of the economic, social, cultural, demographic, environmental and land use issues of the area! In my experience, single solutions to complex problems like the one proposed here are never likely to provide the answer.

Section 4 onwards of the paper, therefore, goes into unjustifiable detail before the case for the national park mechanism has been effectively made.

The area is already designated as a UNESCO Biosphere Reserve, with the approval of both the Scottish and UK Governments. This approach needs time to develop further and a small subvention of money from the Scottish Government made to allow it to operate effectively. The Scottish Government's refusal to fund the means on something it has approved must be urgently resolved. It will cost a lot less than a national park and has greater local control through the SCIO Partnership and is now a proven model internationally.

It is surprising that the discussion paper goes into considerable detail on the powers in relation to the Town and Country planning system, the area and its boundaries, and other details, without making a satisfactory case for this solution compared with others. I note, in particular, that reference is only made in para 7.36 for example to the Scottish Government's proposals for a social and economic development agency for Southern Scotland embracing the Galloway area.

The paper is very anonymous, with only the President being named. And, there is no reference to who has been consulted despite claims that consultations have been undertaken. This secrecy does not follow the best international models of national park development. I hope, therefore, that the Galloway National Park Association will think again about the alternative possibilities and be honest and open in their engagement with local interests, including those of us who live there. An informed debate on the important issues of improving the economic and social future of the area, in helping to resolve the many fold land use conflicts and ensuring that the natural and cultural heritage of the area are properly cared for and, where necessary, restored is definitely needed.

#### **Specific comments**

I have the following specific comments on the discussion paper.

## **Section 1**

1. Despite the reference at the outset to the proposals being “a model for sustainable development” the case is neither formally stated or proven.
2. The paper is focussed predominantly on the social and economic challenges of the area, but proposes a primarily heritage conservation designation as their solution.
3. The description of the coherence of the area, a requirement in the legislation, is weak.
4. The authors do not seem to understand the natural Earth heritage of the area, other than in very general terms as in para 3.8.
5. The paper talks always about Galloway but the area under discussion is much wider and far beyond any reasonable interpretation of Galloway. A definition is sorely needed to resolve this ambiguity.

## **Section 2**

1. The paper fails to mention the overriding point that if there is conflict between the 4 purposes of a park, the park authority has a statutory duty “to conserve and enhance the natural and cultural heritage of the area” (National Parks (Scotland) Act 2000 Section 9 (6)). In other words, the heritage component has primacy.

## **Section 3**

1. This section fails to identify clearly what the problem of the area is in relation to the requirements of the National Parks (Scotland) Act.
2. This section totally fails to assess other mechanisms for dealing with the economic and social issues described. This is a fundamental weakness of the paper. Additionally, we have to wait until para 7.36 before any mention of the Scottish Government’s proposals for an economic and social development agency for the South of Scotland which, from government statements, is more likely to address many of the problems.
3. The section on the natural heritage interest relies entirely on the designations which to most people will mean nothing. The paper needs to address the issue of what more is needed to ensure conservation of the natural heritage features and processes. This needs a succinct and accessible statement on the natural geoheritage. In particular, para 3.8 just will not do.
4. There is no assessment on how this area compares with other parts of Scotland in relation to justification for a national park solution. This is point which the Scottish Government and Scottish Parliament will have to be convinced about.
5. The section on the economic issues, accessibility for transport and ICT are not relevant to what a national park authority can do.
6. Recognising the rapidly of land use change is correct, but there is no convincing statement as to how a national park authority will resolve these issues.
7. The comments on the role and prospects of the Galloway and Southern Ayrshire Biosphere Reserve are derisory and demonstrate an unwillingness to allow this mechanism to develop to its full potential. What is required is not a national park, but Scottish Government agreement to a small amount of financial support to allow the Biosphere to operate effectively.

## **Section 5**

1. The major concern in this section is the assumption, without adequate evidence, that the park authority would be able to do something about land use change. On what basis and under what powers are the first order questions which are not addressed.
2. The planning powers are a smaller issue than the land use issues which are, of course, outwith the town and country planning system.

3. The Scottish model of governance is ineffective. The suggestions for a 30% elected and 70% representative cannot be justified as they are unbalanced between the various interests. I suggest the authors read the best international guidance on governance [http://cmsdata.iucn.org/downloads/governance\\_of\\_protected\\_areas\\_from\\_understanding\\_to\\_action.pdf](http://cmsdata.iucn.org/downloads/governance_of_protected_areas_from_understanding_to_action.pdf)
4. The staffing levels of the two existing national parks should not be models as they are grossly overstaffed for the core functions that the Act requires the authority to perform.

#### **Section 6**

1. It is premature to identify boundaries when so many major issues are unresolved. And there is no coherence to the area, in the way specified in the Act,
2. It is fine to identify different parts of the area, but each has such great internal diversity to call into question the divisions suggested. Based on the IUCN system of defining protected areas by their management objectives, such diversity would be difficult to develop into a coherent management plan for the different parts of the area. Also, the names are meaningless to those who live in these areas.

#### **Section 7**

1. The arguments in this section have not been tested against other potential mechanisms and therefore the treatment is extremely skewed to the solution preferred by the writers rather than the needs of the area.
2. Enhanced profile is unlikely internationally, especially as the area will not be a proper national park on an equivalent basis to those classified under the IUCN system. It would be merely equivalent to the national parks and AONBs in England and Wales.
3. The environmental benefits are illusory and in the 'might just be possible' category but no evidence is presented as to how a national park would provide benefits compared with focussed action by SNH.
4. I would challenge the statement that "the NPA would have the potential and ability to guide and coordinate this change (i.e. agricultural support and renewable energy)" as there is no evidence what so ever that the two existing national parks have had any effect on these types of issues. The authority will have neither the powers nor resources for developing new incentive schemes.
5. There is no discussion of a potential rural tourism promotion and development scheme.
6. The arguments in favour of new business start-ups are again illusory. What is needed are more entrepreneurs not necessarily related to tourism. The development of Natural Power near Dalry without any government support is a case in point.
7. I beg to differ on affordable housing as I fear a national park will exacerbate the existing problem.

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