

RESPONSE TO SCOTTISH CAMPAIGN FOR NATIONAL PARKS STRATEGY

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I strongly welcome the strategy. It is well laid out and comprehensive. It is needed as there is a lack of leadership from the Scottish Government on this manifesto commitment. Congratulations to the Scottish Campaign for National Parks (SCNP) for taking the lead: a classic role for an NGO when there is a vacuum from government.

National parks throughout the world reflect the public view of nationhood and its translation through the will of politicians and governments into statute and designation. It has taken a very long time to achieve this in Scotland, but without political will these changes do not happen. It was no real surprise, therefore, when the incoming Labour Administration announced in September 1997 its decision to establish national parks in Scotland. It was a clear sign of national pride immediately have the positive vote for establishing the Scottish Parliament.

National parks are an international brand, recognised by IUCN's World Commission on Protected Areas as an important element of its *Protected Area Management Categories*. It is essential that the Scottish Parks, existing and new ones, are related to this international framework as it sets a standard approved by IUCN and by the Convention on Biological Diversity signatories. The current exercise *Putting Nature on the Map* assessing all types of protected areas designations in the UK against the IUCN definition of a protected area and assigning those which pass the test to the relevant IUCN Management Category and governance type is underway. The existing national parks in Scotland, as well as those in England and Wales, should be actively involved in this exercise. See www.iucn-uk.org

Now that the first two national parks have been operating for at least a decade, there is a need to formally assess their performance against the criteria set out in the National Parks (Scotland) Act 2000. The assessment in the SCNP report does give a general assessment, but a much more thorough one is needed. Two points illustrate this need. First, there is a lack of progress in establishing favourable habitat in the core areas of the two parks. In both cases, and on land owned inalienably by a conservation NGO, there is severe suppression of the habitats and the situation does not meet the requirements of the EU Natura system or even the domestic requirements of favourable status for SSSIs. Second, and as the report acknowledges, some of the decisions of the park authorities relating to development are contrary to the requirements of the Act. The approval of the Camus Mor housing development near Aviemore and the gold mining development near Tyndrum suggest that the park boards fail to understand their statutory remit about protection of the environment and simply favour development whatever the consequences, maybe under instruction from the Scottish Government with its policy mantra of *sustainable economic growth*, an environmental oxymoron if ever there was one. The recommendation by the SCNP for strengthening of the duty "to conserve and enhance the natural and cultural heritage of the area" where there is a conflict with the other duties is absolutely right. The Scottish Government must take early action to strengthen this provision and to instruct the park authorities to adhere to it.

The report proposes 7 new national parks. It very helpfully elaborates on the original statutory criteria for the identification of new parks and this should be supported by government and parliament. The choice of the areas is, as always, a subject for debate with local and national interests. Personally, I have always argued for a marine and coastal national park from the sea bed to the mountain tops in the Small Isles of the Inner Hebrides as indicating the land/sea connection in protection and enhancement of the environment and in recognising the extraordinary outstanding natural heritage of these areas which residents rely on for their livelihoods and visitors enjoy. But there might in other locations be other models which are just as relevant to the area and to those involved. Galloway is one such place. The Galloway and Southern Ayrshire Biosphere, approved last year by UNESCO, and supported by the Scottish and UK governments as well as all local interests, is a case in point. As Chairman of the Biosphere Partnership Board, I am clear that there is no willingness to go along the national park route because of its bureaucracy and the lack of flexibility in governance and management. In the ensuing debates on the areas proposed by the SCNP, I hope that other mechanisms will also be considered. But, in the end additional national parks for Scotland are fully justified under the terms of the Act approved unanimously by all political parties in the Scottish Parliament in 2000.