

## **PROPOSED GALLOWAY NATIONAL PARK: RESPONSE TO NOVEMBER 2018 UPDATE**

This is a note of my commentary following the public presentations on 12/11/18. Great progress has been made in developing the proposals for the national park, most especially in interacting with local communities and other interests to gather support and in assessing the ideas against the statutory criteria. Much remains to be done to develop the proposals further. I highlight some critical issues to aid the process and would be pleased to discuss with the organisers.

### **The consultation outcomes**

I strongly welcome the extensive public consultation. I accept at face value the outcome in favour of the proposals as it was very positive for the national park proposals. The inclusion of school children with a different timeframe and mind set was very valuable.

Of course, the consultation should have been much earlier in the process in accord with best international practice. I assume that no other options than the status quo were provided. If so, this was a mistake as there are other options: further development of the Galloway and Southern Ayrshire Biosphere (the Biosphere) and the emerging Scottish Government proposals for the South of Scotland Enterprise Agency (SSEA) as an NDPB.

### **Statement of the case**

The statement of the case against the statutory criteria was well thought through and well presented by Gordon Mann.

### **Key issues to be addressed as the proposals are further developed**

As would be expected there are a number of key issues which will have to be addressed before proposals can be presented to the Scottish Government.

#### **1. Dealing with conflict between the park aims**

How will the national park authority deal with conflict between the various statutory aims of the proposed park in the light of the statutory obligation to conserve and enhance the natural and cultural heritage of the area where there is conflict? This is critical for two reasons. First, it is necessary to meet statutory requirements when there will inevitably be conflict with development pressures arising from Scottish Government policies, for instance from renewable energy and from commercial forestry. And, second, I hope that the authority would wish to ensure that the national park passes the international test approved by IUCN as a protected area which requires that 'conservation of nature' is achieved. The critical tests are set out in

[https://iucnuk.files.wordpress.com/2018/03/national\\_parks\\_statement\\_of\\_compliancemay2013.pdf](https://iucnuk.files.wordpress.com/2018/03/national_parks_statement_of_compliancemay2013.pdf)

#### **2. What will the GNP deliver that current and proposed bodies cannot?**

Precisely what can the national park be realistically be expected to deliver on environmental, social, community and economic grounds that are only achievable through national park status, as opposed to existing bodies and their powers and functions (e.g. Galloway & Southern Ayrshire Biosphere (the Biosphere), SNH, SEPA, HES etc) and proposed non national park mechanisms (i.e. SSEA)?

#### **3. How can the GNP have any influence or control over land use change?**

How precisely will the national park be able to influence land use change and government land use policy to safeguard and protect the natural and cultural attributes of the area when

it does not have any powers to do so? What, in particular, does the GNP expect to achieve in relation to proposals for more onshore wind turbines and more commercial forestry and the loss of high biodiversity semi natural grasslands, grazing areas and open landscapes?

**4. How will the GNP aid the development of the Biosphere?**

How will the national park proponents ensure that the excellent work being undertaken by the Biosphere is not undermined or subverted, but is allowed to develop further? And how do the national park proponents envisage the working relationship between two quite separately constituted organisations: the GNP as an NDPB and the G&SAB as a SCIO?

**5. The proposed SSEA has all of the necessary powers and responsibilities so why a GNP?**

The draft South of Scotland Enterprise Agency Bill proposes wide ranging objectives and responsibilities for the new agency, including economic, social and environmental powers. What will the national park add to implementation of these powers and the agency's activities to justify its existence?

**6. What governance arrangements are proposed?**

The current proposals are silent on proposed governance arrangements. These need to be developed. If it is to be just another NDPB controlled by the Scottish Government, how will local views, opinions and ideas and effort be incorporated into the work of the GNP?

**7. Boundary adjustments are needed**

There needs to be local consultations on the boundary as there are many anomalies. For example, why is the area north of Carsphairn towards Dalmellington excluded? The map is the brochure showing the 4 different areas seems difficult to justify from a management perspective, especially the very large 'core area'. Could the organisation consider how the park would be managed through the standard zonation schemes of IUCN: protected areas management categories, especially Categories II, III, IV and V?

**8. The name**

Given the extent of the proposed area into southern Ayrshire and into Dumfriesshire, is it reasonable to continue to use the term Galloway National Park?

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