

# **New National Park(s) - Appraisal Framework Consultation**

**Analysis of responses**

**October 2023**

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# Executive Summary

The Scottish Government committed to establish at least one new National Park in Scotland by the end of this Parliamentary session in 2026. The [New National Parks - appraisal framework: consultation](#) was open between 11 May and 4 August 2023. The consultation aimed to gather a broad range of public and stakeholder views on the draft criteria included in the Appraisal Framework which will be used to assess nominations. In total, 165 consultation responses were received from 132 individuals and 33 organisations.

Overall, there is a high level of support for the seven criteria. The table below shows that all criteria were supported by at least 70% of respondents, with three supported by more than 90%. Similarly, each of the 22 components were supported by between 72% and 94%, with most organisations in agreement.

Package	% agree
Criterion 1: Outstanding national importance	88
Criterion 2: Size, character and coherence	85
Criterion 3: Meeting the special needs of the area	91
Criterion 4: Visitor management and experience	90
Criterion 5: Added value	72
Criterion 6: Local support	77
Criterion 7: Strategic contribution	91

Although respondents were asked to comment if they disagreed with any aspect of the Framework, a range of views were expressed including comments supporting the criteria and components.

## Criterion 1: Outstanding national importance

Some respondents made supportive comments about Criterion 1, expressing their approval of using outstanding national importance as an assessment criterion for new National Parks. However, some concerns were raised. Several respondents argued that the primary criterion for assessing national park candidates should be the potential benefit that they can generate for the environment, with calls for the framework to focus more closely on nature conservation, restoration and recovery. While not directly related to Criterion 1, a few respondents were critical of the management of existing National Parks, suggesting that this has resulted in excessive development and exploitation of the land.

Several called for greater clarity and a more detailed definition of the proposed criterion. In particular, the terms 'national' and 'outstanding' were described as unclear, open to interpretation and difficult to assess.

Several respondents viewed Component 1 as a higher priority than Component 2, describing natural heritage as more important than cultural heritage when assessing bids for potential National Park status. A few respondents felt that deep cultural heritage should not be an essential feature of a National Park, and such a requirement may exclude

otherwise adequate candidates. A small number of organisations felt that separating Component 1 and Component 2 was unhelpful and called for them to be combined.

### **Criterion 2: Size, character and coherence**

A few made broadly supportive comments about the criterion, agreeing that it is important to consider the size, character and coherence of potential National Park candidates. Others called for a degree of flexibility within this criterion to allow for a variety of models or landscapes to be considered for National Park status.

While most who commented agreed that distinctive character is an important quality, a few challenged including coherent identity under Component 1. Concerns were raised that very few candidates of sufficient size would be able to demonstrate coherent identity across the span of an entire area.

Regarding Component 2, a few described the phrase 'sufficient size' as vague and called for more information about this component. Some disagreed with including size as a qualifying factor in the assessment framework, fearing this may restrict the consideration of smaller potential sites.

### **Criterion 3: Meeting the special needs of the area**

Some respondents agreed that the special needs of the area must be considered when assessing nominations for a new National Park. Several respondents cautioned that meeting the special needs of an area may be a difficult criterion for candidates to adhere to, advising that a site may have conflicting or opposing needs across different parts. A few respondents emphasised the importance of balancing the needs of local communities with national needs and the wider aims of the National Park.

There was widespread support for all five components of Criteria 3, with open comments focusing on the perceived order of importance of the components. For example a few respondents described Component 2 as the most important component under Criterion 3, emphasising the crucial role of National Parks in promoting and delivering nature recovery and restoration.

### **Criterion 4: Visitor management and experience**

Respondents agreed that visitor management and experience should be a criterion for assessing nominations for new National Parks. They stressed that this should consider how the area would manage increased visitor numbers, but also how a park will ensure visitors enjoy the spaces and understand the area's history and cultural heritage. Respondents who disagreed with the criterion and provided a reason suggested that visitor management had not been effective in the other National Parks in Scotland.

Many respondents had comments about Component 3 about future transport infrastructure. While most agreed with the component, some suggested clarifications or additions, such as an emphasis on green or eco-transport infrastructure and education for all visitors on how to safely and sustainably enjoy and engage with the natural environment.

Some respondents agreed with Component 1 about enhancing opportunities for enjoyment, recreation and understanding of the area's natural and cultural heritage, but suggested further considerations or amendments to the wording. These included consideration of an area's contribution to a just transition to net zero, commitment to nature recovery, the value a place has in changing perceptions or challenging behaviours to support future sustainability, and how a new national park will encourage visitors to understand the interaction between the built and natural landscapes.

### **Criterion 5: Added value**

While still recording a high level of agreement (72%), Criterion 5 recorded the lowest level of agreement of the seven criteria. Many who disagreed highlighted their dislike of the term 'added value', often due to their interpretation of this as monetary value or financial gain. Many respondents, whether they agreed, disagreed or were unsure about the criterion, suggested that a clearer definition of added value was necessary. Respondents noted that value, even financial value, could speak to a number of different outcomes. They asked for clarity about whether it was intended to be financial – and if so, for whom – or whether value could also speak to environmental, social, or cultural heritage concerns.

Open comments in response to the components of Criterion 5 typically reflected on the clarity of the wording of both the criterion and the components, specifically the 'added value' rather than the individual components. A small number of respondents made specific suggestions for further consideration.

### **Criterion 6: Local support**

Many agreed with this criterion, but only some gave detailed reasons why, noting that people living and working in or around the proposed area need to agree with the plan and benefit from creating the new National Park. All those who provided further detail about their opposition to the criterion were individuals. A few highlighted a worry that local opinions could be swayed by lobbyists or interest groups. A few others disagreed because they believed a National Park is in the national interest and therefore creating one should not be based entirely on local opinion. There were concerns from several about how to balance the different interests of the people involved. For example, a few posed questions around how national importance should be measured against local importance, how a loud minority opposition could be considered against a quieter supporting majority, and how business interests could be weighed against individual perspectives.

Some respondents provided feedback on Component 1 about local support. A few asked for a clearer understanding of who would be classified as local under this component. A request for robust local representation, capturing a multitude of views, both positive and negative, was requested by a few respondents.

There were mixed views from several respondents in response to Component 2 about support from local authorities. A few of those who agreed requested further clarification on what information councils should supply in support of an application and how they would make it clear whether they support the nomination for all or only part of their area. Among those who disagreed or were unsure about the component, the main concern was that local authorities' position could differ from that of the people or organisations in their area.

## **Criterion 7: Strategic contribution**

While many agreed with the proposed criterion, only a few noted the importance of using National Parks to show how natural landscapes can be preserved and protected, increase biodiversity and be used to help mitigate climate change. A few were critical of how the creation of the two existing National Parks had been managed, as well as their current management. Individuals cited increased development of the areas and negative impacts on local populations, such as decreased wages, as their reasons for disagreeing. A few others disagreed because they thought National Park status would not effectively help environmental issues.

Support for the five components of Criterion 7 varied from 84% for Component 3 to 91% for Component 5. Of the respondents who provided further comment on Component 3 about sustainable investment in an area's natural capital, most disagreed due to concerns over the concepts of natural capital and sustainable development, which they distrusted.

A few respondents noted concern about prioritising economic benefits from new National Parks. A few respondents suggested that the goals and aims of a wellbeing economy should be included, such as health and happiness.

## **Other considerations**

Two further questions asked respondents for their views on the overall scoring process, and to provide any other comments on the draft Appraisal Framework.

Many respondents suggested that environmental considerations, such as ecological preservation, climate mitigation and biodiversity protection, should be given priority in the scoring process. Several respondents commented on the process of scoring applicants, with a small number requesting clarity on how criteria that seemed to overlap would be assessed.

Transparency was highlighted by several as necessary for a fair assessment of applications. Some respondents mentioned that the criteria need to be clarified and the weighting and scoring structure available to applicants before they apply.

## **Conclusions**

Overall, the key message was that, with some refinement, there is widespread support for the draft Appraisal Framework. The findings from the analysis will be used by the Scottish Government to revise and finalise the Appraisal Framework which will then be published ahead of the nominations phase of the selection process.

# 1. Introduction

## Background

The Scottish Government committed to establish at least one new National Park in Scotland by the end of this Parliamentary session in 2026. The existing National Parks are: Loch Lomond and the Trossachs National Park, established in 2002; and the Cairngorms National Park, established in 2003.

Currently, no criteria for selecting National Parks exist other than the limited statutory criteria in the [National Park \(Scotland\) Act](#). Following an extensive consultation process, an Appraisal Framework has been drafted by the Scottish Government. This framework will support the selection of New National Parks.

The [New National Parks - appraisal framework: consultation](#) was open between 11 May and 4 August 2023. The consultation aimed to gather a broad range of public and stakeholder views on:

- The draft criteria for the appraisal of nominations for a new National Park designation
- The components of each of the criteria for the appraisal of nominations for a new National Park designation
- Any other comments in relation to the documents

The findings from the analysis will be used by the Scottish Government to revise and finalise the Appraisal Framework which will then be published ahead of the nominations phase of the selection process.

## Respondent profile

In total, 165 consultation responses were received. Almost all were submitted via the online consultation platform, Citizen Space. Those received in an alternative format, for example, an email or PDF document, were reviewed separately by the research team.

Individuals provided 132 responses to the consultation; the remaining 33 were from organisations. To aid analysis, organisations were grouped on the nature of their work. The following table shows the number of organisations by group.

**Table 1: Sectoral classification**

Sector	n=	%
Individuals	132	80
Organisations	33	20
- Interest organisations / Stakeholders	15	9
- Public sector bodies	11	7
- Built Environment / Land management	4	2
- Energy	3	2

## Analysis approach

The Lines Between was commissioned to provide a robust, independent analysis of the responses to the public consultation. The main purpose of consultation analysis is not to quantify how many people held particular views but to understand the full range of views expressed. This report provides a thematic analysis of responses based on the analysis approach outlined below.

### Quantitative analysis

There were 29 closed consultation questions which asked respondents whether they agreed or disagreed with the criteria and their components included in the Appraisal Framework.

As not all respondents answered each closed question, each table in this report shows the number and percentage of responses **among those answering each question** and, for the criteria, broken down by individual and organisation responses and by type of organisation. Please note that figures in the tables may not add to 100% due to rounding.

A full breakdown of the number and percentage of responses to each question can be found in Appendix A.

### Qualitative analysis

Qualitative analysis identifies the key themes across responses to each question. The analyst team developed a draft coding framework based on a review of the consultation questions and a sample of responses. During the full coding process, new codes were created if additional themes emerged.

In a small number of instances where alternative format responses contained information that did not align to specific questions, analysts exercised judgement about the most relevant place to include this material for analysis purposes.

Where appropriate, quotes from a range of participants are included to illustrate key points and provide useful examples, insights and contextual information.

Reflecting the large number of people who took part, it is not possible to detail every response in this report; a few organisations shared lengthy submissions which reflect their specific subject matter expertise. These responses are referenced where possible. Full responses to the consultation, where permission for publication was granted, can be found on the [Scottish Government's consultation website](#).

When reviewing the analysis in this report, we would ask that the reader consider:

- Public consultation of this kind means anyone can express their views; individuals and organisations interested in the topic are more likely to respond than those without a direct or known interest. **This self-selection means the views of respondents do not necessarily represent the views of the entire population.**
- Most of the consultation's open questions asked respondents to elaborate on why they disagreed with a criterion or component of the Appraisal Framework. However,



reasons for agreement were also received. All comments have been included in this report, regardless of the views expressed.

- For each criterion and its component parts, respondents were asked to provide their views in two separate open questions. However, some respondents discussed the components under the criteria question, and vice versa; others left comments not directly related to either the criteria or components. All comments have been considered in this report, under the most relevant question, criteria or component.

### **Weight of opinion**

This report presents the themes identified in responses from most to least commonly identified. All themes, including views shared by small numbers of respondents, are covered.

Qualitative analysis of open-ended questions does not permit the quantification of results; an insightful view expressed by a very small number of participants is not given less weight than more general comments shared by a majority. However, to assist the reader in interpreting the findings, a framework is used to convey the most to least commonly identified themes in responses to each question:

- The most common / second most common theme; the most frequently identified.
- Many respondents; more than 20, another prevalent theme.
- Several respondents; 10-19, a recurring theme.
- Some respondents; 5-9, another theme.
- A few / a small number of respondents; <5, a less commonly mentioned theme.
- Two / one respondents; a singular comment or a view identified in two responses.

## 2. Quantitative summary

This chapter provides an overview of the level of agreement with the seven criteria and 22 components in the draft Appraisal Framework.

The following table presents the results of each closed question based on the total sample of those who answered each question, enabling a comparison across criteria and components. Please note that the row percentages may not add to 100% due to rounding.

Overall there is a high level of support for the seven criteria in the draft Appraisal Framework. All criteria were supported by more than 70% of respondents, with three supported by more than 90%, and each of the 22 components of the criteria was supported by between 72% and 94% of respondents.

<b>All answering for each criteria / component:</b>	<b>n=</b>	<b>% Agree</b>	<b>% Disagree</b>	<b>% Don't know</b>
<b>Criterion 1: Outstanding national importance</b>	<b>157</b>	<b>88</b>	<b>9</b>	<b>3</b>
Component 1: Is the proposed area of outstanding national importance due its natural heritage, including biodiversity, geodiversity and landscapes?	156	89	8	3
Component 2: Is the proposed area of outstanding national importance due to the area's cultural heritage, including the historic environment?	149	77	14	9
<b>Criterion 2: Size, character and coherence</b>	<b>155</b>	<b>85</b>	<b>12</b>	<b>3</b>
Component 1: Does the proposed area have a distinctive character and coherent identity?	155	88	9	3
Component 2: Is the proposed area of a sufficient size to warrant integrated management as a National Park?	152	77	15	8
<b>Criterion 3: Meeting the special needs of the area</b>	<b>158</b>	<b>91</b>	<b>6</b>	<b>4</b>
Component 1: How would National Park designation support the conservation and enhancement of cultural heritage and the historic environment?	155	87	11	2
Component 2: How would National Park designation support nature recovery and restoration in the area, including ecosystem restoration, protection and recovery of vulnerable and important species and wildlife management?	154	94	5	1

<b>All answering for each criteria / component:</b>	<b>n=</b>	<b>% Agree</b>	<b>% Disagree</b>	<b>% Don't know</b>
Component 3: How would National Park designation help to promote the understanding and enjoyment of the area by Scotland's people?	153	86	10	5
Component 4: How would National Park designation support the sustainable development and well-being of local communities?	155	91	7	2
Component 5: How would National Park designation support the sustainable use of the area's natural resources and how it would make a significant contribution to climate change mitigation and adaptation?	154	92	5	4
<b>Criterion 4: Visitor management and experience</b>	<b>155</b>	<b>90</b>	<b>6</b>	<b>5</b>
Component 1: How would National Park designation enhance opportunities for enjoyment, recreation and understanding of the area's natural and cultural heritage?	154	90	6	4
Component 2: How would National Park designation support visitor management in the area?	154	88	6	6
Component 3: How could National Park designation support current and potential future transport infrastructure in and around the proposed area?	154	86	6	8
Component 4: How could National Park designation support access to nature for Scotland's people?	155	87	8	5
<b>Criterion 5: Added value</b>	<b>155</b>	<b>72</b>	<b>17</b>	<b>11</b>
Component 1: How would the benefits of a National Park in the area justify the investment required?	153	76	13	11
Component 2: What is the added value that National Park designation would bring to the area?	151	72	17	11
<b>Criterion 6: Local support</b>	<b>157</b>	<b>77</b>	<b>14</b>	<b>9</b>
Component 1: What level of local support (with evidence) is there from local interests (community bodies, landowners and managers, businesses, third sector organisations, public bodies etc).	157	73	17	10

<b>All answering for each criteria / component:</b>	<b>n=</b>	<b>% Agree</b>	<b>% Disagree</b>	<b>% Don't know</b>
Component 2: What level of support (with evidence) is there from the local authority/authorities in the area?	157	72	15	13
<b>Criterion 7: Strategic contribution</b>	<b>156</b>	<b>91</b>	<b>8</b>	<b>1</b>
Component 1: How could National Park designation support the area's leadership on climate change mitigation and adaptation in a way that is fair and inclusive for local communities?	154	87	8	5
Component 2: How could National Park designation support the area's contribution to commitments within the Scottish Biodiversity Strategy, including ecosystem restoration, protection and recovery of vulnerable species, wildlife management, nature friendly farming, the expansion of areas that are protected for nature and the development of nature networks?	152	88	6	6
Component 3: How could designation as a National Park support sustainable investment in the area's natural capital?	153	84	10	7
Component 4: How could designation as a National Park support the development of green skills and jobs in the area?	153	89	7	4
Component 5: How could designation as a National Park complement the contribution that Scotland's existing National Parks make to tackling the nature and biodiversity crises?	151	91	5	4

### 3. Criterion 1: Outstanding national importance

This chapter examines respondents' views on Criterion 1 and its two components. Respondents were asked whether outstanding national importance should be considered when assessing new National Parks, and specifically whether natural and cultural heritage should be considered.

#### Views on the criterion

Q1. Do you agree that 'outstanding national importance' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	157	88	9	3
Individuals	129	86	10	4
Organisations	28	96	4	0
- Interest organisations / Stakeholders	14	93	7	0
- Public sector bodies	10	100	0	0
- Built Environment / Land management	3	100	0	0
- Energy	1	100	0	0

Almost nine in ten (88%) of those answering Q1 agreed that outstanding national importance should be a criterion for assessing nominations. The vast majority of individuals (86%) and organisations (96%) agreed with the criterion. Only one organisation – NFU Scotland – disagreed.

Q1 received 30 open text comments. As noted in the introduction, although respondents were asked to comment if they disagreed, a range of views were expressed; some were supportive of Criterion 1, while others were more critical.

#### Supportive comments

Some respondents made supportive comments, expressing their approval of using outstanding national importance as an assessment criterion for new National Parks.

“National Parks should represent areas of outstanding national importance due to their natural and cultural environment.” – South of Scotland Enterprise

“We agree that outstanding national importance should be a selection criterion for the new National Park.” – RSPB Scotland

One respondent described the proposed criterion as consistent with the requirements of the National Parks (Scotland) Act 2000.

### **Prioritising environmental considerations**

However, some concerns were raised about the proposed criterion. Several respondents argued that the primary criterion for assessing national park candidates should be the potential benefit that they can generate for the environment, with calls for the assessment framework to focus more closely on nature conservation, restoration and recovery. Others disagreed with the introduction of a new National Park, instead advocating for environmental protection and restoration to be implemented across all of Scotland's land, rather than in a specific area.

"Designating areas of outstanding national importance could also lead to 'winners' and 'losers' throughout Scotland, by drawing arbitrary lines on a map. This is contradictory to Government commitments around just transition and fairness. NFUS [National Farmers Union Scotland] strongly believes that it is better the whole of Scotland is improved, rather than select parts." – NFU Scotland

While these comments were prevalent in response to Q1, the importance of prioritising environmental considerations when assessing applications was a recurring theme raised by some respondents across multiple consultation questions. However, as little additional detail was provided by the respondents making this request, only brief references are made to this theme in the remainder of the report to avoid repetition.

### **Debate over location qualifier**

The use of the term 'national' as a qualifier for importance was challenged by a few respondents. Two were concerned that if a location is deemed to have outstanding national importance it could overshadow the interests of the local community. Another contested that the National Parks (Scotland) Act 2000 does not specify that outstanding 'national' importance should be a criterion.

There were calls for the 'regional' significance of National Park candidates to be considered in conjunction with national importance.

"To ensure support and effective engagement of local communities it is also important that the area reflects regional significance." – Dumfries and Galloway Council

Galloway and Southern Ayrshire UNESCO Biosphere called for 'international' importance to be included in the criterion.

### **Calls for more detail**

Several called for greater clarity and a more detailed definition of the proposed criterion; it was described as unclear, open to interpretation and difficult to assess.

"The definition of 'outstanding national importance' should be clearly defined as not to undermine the credibility of this designation." – Scottish Power Renewables

“It's a nebulous and subjective criterion.” – Individual

"Who is to say whether a particular area is or should be of outstanding 'national' importance? On what basis can such a claim be made?" – Individual

“I agree in principle, but I don't think this term has been defined well enough within the framework, leaving too much ambiguity and room for dispute.” – Individual

The term ‘outstanding’ was seen as particularly ambiguous and subjective. A few described the outstanding national importance criterion as unnecessary and potentially restrictive, with one individual arguing that a National Park “merely needs to be somewhere special; an area of natural beauty or significance that we want to protect for future generations”.

“I disagree with the word "outstanding" as I fear it could be used to block worthy candidates for park status.” – Individual

However, the John Muir Trust welcomed keeping this interpretation open “so that nominees can explain what makes an area outstanding”.

Different approaches to identifying the site of Scotland’s new National Park were proposed by respondents. For example, a few suggested that rather than selecting an area of outstanding national importance, an undeveloped site, such as brown space or an ash lagoon, could be transformed into a National Park.

“The ability to seek enhancement of degraded areas or areas that do not meet the national importance test, should also be considered, in order to enhance and complement the core of the potential Park.” – Scottish Borders Council

“There is an argument that there could be more benefit in areas which are not already outstanding for biodiversity... Therefore more benefit could be accrued.” – Scottish Land and Estates

### **Criticism of existing park management**

While not directly related to Criterion 1, a few respondents were critical of the management of existing National Parks, suggesting that this has resulted in excessive development and exploitation of the land. This small number of respondents repeatedly raised their concerns throughout the consultation; to avoid repetition they are acknowledged here. For example, at Q16 – do you have any other comments? – a few respondents raised concerns about the proposed development of a theme park at Loch Lomond.

In Q1, one individual called for National Parks to be replaced by publicly owned nature reserves; another described the process of establishing a new National Park as too complicated and called for less regulation and bureaucracy. In Q16, one individual called for reforms to the national parks system, highlighting the importance of protecting all land, not just the areas designated as National Parks.

## Other comments

A few called for existing UNESCO sites to be considered for National Park status.

“There may be some designations, e.g. UNESCO Biospheres, that already meet the aims of a National Park and deliver across the criteria making up the framework so there will be value in looking at the connections between existing designations.” – Dumfries and Galloway Council

Two advised against considering new candidates in isolation, suggesting that a new National Park should offer something unique or different from the two existing National Parks in Scotland. One respondent suggested that Scotland’s National Parks should be connected by corridors of land to enable safe dispersal and movement of wildlife and ecosystems within them.

## Views on the components

Q2. Do you agree with the components of criterion 1 (outstanding national importance)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: Is the proposed area of outstanding national importance due its natural heritage, including biodiversity, geodiversity and landscapes?	156	89	8	3
Component 2: Is the proposed area of outstanding national importance due to the area's cultural heritage, including the historic environment?	149	77	14	9

The table above details the results for each component among all respondents who answered each question. Tables with a full breakdown of results by respondent type are provided in Appendix A.

Most respondents agreed with Component 1 of the criterion – 89% of those who answered agreed, as did 88% of individuals and 93% of organisations.

While agreement with Component 2 about considering cultural heritage was comparatively lower, over three quarters (77%) of those answering agreed with its inclusion. Agreement was lower among individuals, with 73% agreeing compared to 93% of organisations.

Q2 received 38 open text comments. Broadly, the two components were well received. However, as with the overarching criterion, there were calls for more detail about each component.



**Component 1: Is the proposed area of outstanding national importance due its natural heritage, including biodiversity, geodiversity and landscapes?**

Several respondents viewed Component 1 as a higher priority than Component 2, describing natural heritage as more important than cultural heritage when assessing bids for potential National Park status. This aligns with the recurring theme of prioritising environmental considerations.

“While cultural heritage is important it should be secondary in consideration to the natural heritage.” – Individual

“I think Criterion 1 is more important given we are in a situation where Climate Change is impacting on us. Biodiversity, geodiversity and landscapes are more important than historic & cultural heritage.” – Individual

Two highlighted that cultural and historic sites have other bodies which oversee their preservation, such as Historic Environment Scotland, and therefore natural heritage should be the priority for National Park candidates.

While most were supportive of Component 1, a few expressed concern that a requirement for outstanding natural heritage may exclude urban areas from National Park candidacy.

“There are many urban areas that could be defined as having outstanding national importance, and indeed cultural heritage. But the lack of ‘natural heritage’ may preclude them from becoming a national park. We believe that component one restricts the potential of urban areas, while at the same time placing extra burdens onto rural areas.” – NFU Scotland

“I would like to propose a national park in the central belt, which component 1 might prevent.” - Individual

A few organisations, including RSPB Scotland and Scottish Environment LINK, requested more detail about the ecological criteria that would be used to determine whether a candidate’s natural heritage is of national importance.

**Component 2: Is the proposed area of outstanding national importance due to the area’s cultural heritage, including the historic environment?**

As noted above, Component 2 was viewed as less significant and less relevant than Component 1 by most who commented. A few respondents felt that deep cultural heritage should not be an essential feature of a National Park, and such a requirement may exclude otherwise adequate candidates.

“I think an area such as the flow country should have as much right to be a contender for reasons of its natural heritage alone (I don't know how much of a cultural heritage, if any, it has) as, say, Rannoch moor, which has both natural and cultural heritage.” – Individual

“Many major cities have a deep cultural heritage, yet that seems hardly fitting for a national park.” – Individual

However, others welcomed Component 2 and agreed that preserving and celebrating Scotland’s cultural heritage should be a priority for a new National Park. Some reiterated these calls at Q16 – Do you have any other comments? A few called for Component 2 to be considered very broadly so as not to exclude less obvious areas of cultural importance. It was proposed that industrial and agricultural heritage should be included under the definition of cultural heritage. Also at Q16, Bòrd na Gàidhlig emphasised the importance of the cultural history of the Gaelic language and culture, which they suggested should be included in any National Park proposal.

### **Suggestions for additional components**

Some additional components were proposed for inclusion under Criterion 1, such as:

- Biological health and diversity of the landscape.
- Recreational and educational capacity.
- Capacity for nature recovery and community regeneration.
- Resilience of the landscape (i.e. ability to absorb substantial visitor numbers without having a negative impact on the area).
- Public transport links.
- Renewable energy infrastructure.
- Wildness.

### **Other comments**

Cultural and natural heritage were described as highly integrated, with a few highlighting that historic features and processes can shape landscapes and natural assets. A small number of organisations, including Historic Scotland and Built Environment Forum Scotland (BEFS) felt that separating Component 1 and Component 2 was unhelpful and called for them to be combined into one category.

“BEFS welcomes the inclusion of cultural heritage and the historic environment as components for Criterion 1, however would suggest that the presenting cultural heritage and natural heritage as separate criterion could undermine the fundamentally interconnected nature of the two.” – Built Environment Forum Scotland (BEFS)

Some respondents anticipated difficulty assessing candidates based on their natural and cultural heritage, describing them as contested or subjective constructs.

“While this is laudable, there will need to be more guidance available on this. Every area of Scotland could lay claim to being nationally important both for natural and cultural heritage.” – Scottish Land & Estates

“I imagine this would not be a functioning discriminator... isn't all of Scotland suffused with cultural significance?” – Individual

## 4. Criterion 2: Size, character and coherence

Respondents' views on Criterion 2 and its two components are presented in this chapter. Q3 and Q4 asked if proposed new National Parks should be assessed for a distinctive character, coherent identity and be of a sufficient size to warrant integrated management.

### Views on the criterion

Q3. Do you agree that 'size, character and coherence' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	155	85	12	3
Individuals	127	83	14	3
Organisations	28	96	4	0
- Interest organisations / Stakeholders	14	100	0	0
- Public sector bodies	10	100	0	0
- Built Environment / Land management	3	67	33	0
- Energy	1	100	0	0

Among those answering Q3, 85% agreed that size, character and coherence should be a criterion. Over four fifths of individuals (83%) and most organisations (96%) agreed with the criterion; only one anonymous organisation disagreed.

Q3 received 31 open text comments. Few commented on the overarching criterion; most comments related to one of the components and as such were considered under Q4.

A few made broadly supportive comments about the criterion, agreeing that it is important to consider the size, character and coherence of potential National Park candidates. Others called for a degree of flexibility within this criterion to allow for a variety of models or landscapes to be considered for National Park status. For example, some encouraged the Scottish Government to consider a range of approaches to drawing park boundaries.

"We favour different and creative ways of looking at a boundary for a National Park. For example, we suggest a National Park could encompass a series of distinct, but linked, areas across a region – that would collectively be of sufficient size, character and identity to form a National Park." – South of Scotland Enterprise

"There should be flexibility in size, character and coherence to allow a variety of models that is relevant for the nature of the locality and qualifying criteria... we would argue in favour of considering a range of innovative approaches to National Park boundaries, including the possibility of designating different types of parks such as linear parks (say a river catchment) or a network of a collection of smaller park areas (multi-locational) with one central administration." – Scottish Borders Council

“I disagree with the notion that 'size, character, and coherence' should be a criterion for assessing nominations for new National Park. My concern lies in the potential limitations imposed on prospective national park areas that are smaller and geographically separated from other areas of natural importance. I believe it would be more advantageous to consider creating multiple smaller areas that collectively constitute a national park. By adopting a more flexible approach, we can recognize and preserve the numerous small pockets of natural beauty scattered throughout the central belt of Scotland. These areas might not meet the requirements for a single large and continuous national park, but they still hold significant value and should not be excluded from this important categorization.” - Individual

A small number did not consider the features listed under Criterion 2 to be important, with some repeating their view that environmental benefits, biodiversity and nature recovery are the sole or most important considerations for National Park candidates.

### Views on the components

Q4. Do you agree with the components of criterion 2 (size, character and coherence)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: Does the proposed area have a distinctive character and coherent identity?	155	88	9	3
Component 2: Is the proposed area of a sufficient size to warrant integrated management as a National Park?	152	77	15	8

Respondents were mostly positive about Component 1; 88% of those answering, including 86% of individuals and 96% of organisations supported the consideration of an area's character and identity.

There was also support for Component 2 and the consideration of size, though at 77% this was lower than for Component 1. While agreement was relatively similar among individuals (77%) and organisations (79%), opinions varied among organisations. Most interest organisations / stakeholders (93%) agreed, as did 80% of public sector bodies, while other organisations held expressed more mixed views.

Q4 received 35 open text comments.

#### Component 1: Does the proposed area have a distinctive character and coherent identity?

While most who commented agreed that distinctive character is an important quality, a few challenged the inclusion of coherent identity under Component 1. Concerns were raised that very few candidates of sufficient size would be able to demonstrate coherent identity

across the span of an entire area. Some warned that this criterion may exclude otherwise worthy candidates and called for flexibility when assessing candidates against this component. A few claimed that a site's coherence can change or be nurtured or developed over time.

“Would areas that have multiple identities due to recent or historical migration then not have a coherent identity - and if so, why exclude them from being able to become a national park?” – Individual

“Coherence is also important to enable consistent approaches. However any area of scale will require nuance and understanding of localised issues and constraints/opportunities. Coherence in terms of landscape may not be reflected in coherence on land use, which will be equally important as it will require an integrated approach to deliver the multiple benefits sought.” – Scottish Land & Estates

Distinctive character was considered a subjective term, with a few cautioning that this could be difficult or contentious to assess as a criterion.

“Who decides what "character" is of value?” – Individual

## **Component 2: Is the proposed area of a sufficient size to warrant integrated management as a National Park?**

A few described the phrase sufficient size as vague and called for more information about this component; for example, whether there would be parameters placed around this i.e. a maximum or minimum size.

“We agree but not clear what would be considered "a sufficient size" by [the Scottish Government] in this context.” – Campaign for a Scottish Borders National Park

“It would be helpful to have more information in the appraisal criteria about Component 2 as there is a lack of detail about what is meant by the reference to an area being of sufficient size to be a National Park.” – Crown Estate Scotland

“Further guidance may be required on the sufficient size criteria to ensure informed applications.” – Perth & Kinross Council

Some respondents disagreed with including size as a qualifying factor in the assessment framework, fearing this may restrict the consideration of smaller potential sites. A few advised against including a minimum size requirement.

“My concern is that emphasizing size as a primary criterion could exclude smaller areas of natural beauty that may have a distinctive character and coherent identity.” – Individual

“I agree that character and coherence should be prerequisites but depending on exactly what size is set, that could rule out any contenders from within an urban region - such as, for example, Holyrood Park.” – Individual

“Including 'size' has got potential to dissuade small areas of significant biodiversity/rare eco systems from applying/being chosen.” – Individual

However, others agreed with considering the size of potential sites, noting that candidates must be large enough to deliver their core functions and warrant the significant expenditure and resource associated with National Park status.

### **Suggestions for additional components**

Some additional components were proposed for inclusion under Criterion 2, such as:

- Biological health and diversity of the landscape, including the presence of peatland.
- Local tourism infrastructure i.e. hotels, car parking, tour bus/sightseeing facilities.

### **Other comments**

Galloway and Southern Ayrshire UNESCO Biosphere advised the Scottish Government to consider evaluation methods similar to that of UNESCO Biospheres by adopting “a three-tiered zoned approach that runs from areas of high ecological value; through to low key sustainable activity and ecological connectivity; and then onto a wider area that embraces cultural diversity and sustainable development.”

## 5. Criterion 3: Meeting the special needs of the area

This chapter presents an analysis of views on Criterion 3 and its five components, which consider whether meeting the special needs of the area should be part of assessing nominations.

### Views on the criterion

Q5. Do you agree that 'meeting the special needs of the area' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	158	91	6	4
Individuals	128	90	7	3
Organisations	30	93	0	7
- Interest organisations / Stakeholders	15	100	0	0
- Public sector bodies	10	80	0	20
- Built Environment / Land management	4	100	0	0
- Energy	1	100	0	0

There was widespread support for Criterion 3 among those answering Q5. Over nine in ten (91%) agreed with the criterion, making it the joint most supported criterion along with Criteria 7. Support was equally high among individuals (90%) and organisations (93%), with no organisations opposed and two unsure.

### Supportive comments

Q5 received 26 open text comments. Some respondents expressed support for Criterion 3, agreeing that the special needs of the area must be considered when assessing nominations for a new National Park.

"Yes, we agree that nominations must explicitly address how national park status will provide benefits for existing communities and businesses, and to attract and retain the local population to stay and work in the area. Nominations should set out how they will address specific issues such as rural connectivity, ageing populations, transport infrastructure, housing shortages, and permanent employment." – NFU Scotland

A few added that candidates' adherence to Criterion 3 will help to support nature recovery and habitat and species management efforts.

## Reasons for disagreement

Several respondents cautioned that meeting the special needs of an area may be a difficult criterion for candidates to adhere to, advising that a site may have conflicting or opposing needs across different parts. For example, one described agricultural and farming practices as at odds with rewilding and ecological restoration efforts, and another described public access and tourist activity as incompatible with nature conservation work.

“There is potential tension between supporting nature recovery and restoration and promoting the understanding and enjoyment of the area by Scotland's people. There can be a need to restrict access to enable nature recovery and this does not always sit well with the national park designation and the ability to attract more visitors. We have also seen ecological damage done by visitors which require careful management and messaging.” – Scottish Land & Estates

Others highlighted that the special needs and priorities of different candidates will vary significantly, and this may result in difficulties in assessing bids.

## Other comments

A few respondents emphasised the importance of balancing the needs of local communities with national needs and the wider aims of the National Park. One commented more explicitly that it is important to consider the special needs of the entire country rather than a specific area when selecting a new National Park.

“We agree that meeting the special needs of the area should be a criterion, this is important to ensure that the needs of local communities are adequately taken into account. It will be vital to ensure that any new National Park is equipped and ready to work with communities to ensure their sense of place is not negatively impacted, for example through increased traffic, tourism numbers, housing development, or infrastructure development. Ideally, bids will also outline how they propose the National Park will help lead a Just Transition to nature positive and net zero in a way that benefits local communities, in line with the Scottish Government’s ambitions for National Parks.” – RSPB Scotland

A small number of respondents did not fully understand the meaning of ‘special needs of the area’ and asked for more detail or specific examples to be provided.

A few responses to Q5 were not directly related to Criterion 3. These included the need for any new National Park to be adequately resourced and that any successful candidates will require investment to help develop tourism infrastructure like hotels, restaurants and public toilets.



## Views on the components

Q6. Do you agree with the components of criterion 3 (meeting the special needs of the area)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: How would National Park designation support the conservation and enhancement of cultural heritage and the historic environment?	155	87	11	2
Component 2: How would National Park designation support nature recovery and restoration in the area, including ecosystem restoration, protection and recovery of vulnerable and important species and wildlife management?	154	94	5	1
Component 3: How would National Park designation help to promote the understanding and enjoyment of the area by Scotland's people?	153	86	10	5
Component 4: How would National Park designation support the sustainable development and well-being of local communities?	155	91	7	2
Component 5: How would National Park designation support the sustainable use of the area's natural resources and how it would make a significant contribution to climate change mitigation and adaptation?	154	92	5	4

As with the overall criteria, there was widespread support for all five components of Criteria 3.

- 94% agreed with Component 2, the highest rating of all components in the framework.
- 92% agreed with Component 5, the second highest rated of all components.
- Between 86% and 91% agreed with the other three components.
- Between 90% and 97% of organisations agreed with each component, with no single organisation or type of organisation being consistently opposed.

Q6 received 49 open text comments, covering comments related to each component, and other more general points.

### **Component 1: How would National Park designation support the conservation and enhancement of cultural heritage and the historic environment?**

Few respondents commented on Component 1. A few considered the preservation of cultural heritage as a lower priority than the other components under Criterion 3, with one describing themselves as ‘ambivalent’ towards it. One suggested switching the order of Component 1 and Component 2 so that nature recovery is listed first and is therefore presented as the highest priority.

However, Historic Environment Scotland and ScottishPower Renewables welcomed this component, agreeing that a new National Park should support Scotland’s rich cultural heritage and historic environment. Comhairle nan Eilean Siar advised that if a new National Park is within a traditional Gaelic-speaking community, there should be a focus on enhancing the language and its related culture.

### **Component 2: How would National Park designation support nature recovery and restoration in the area, including ecosystem restoration, protection and recovery of vulnerable and important species and wildlife management?**

A few respondents described Component 2 as the most important component under Criterion 3, emphasising the crucial role of National Parks in promoting and delivering nature recovery and restoration.

Perth and Kinross Council suggested amending ‘vulnerable and important species’ to include ‘vulnerable and important species and habitat’. In their response, Scottish Rewilding Alliance discussed the benefits of rewilding and described it as “a clear route by which we can achieve nature recovery within our national parks.”

### **Component 3: How would National Park designation help to promote the understanding and enjoyment of the area by Scotland’s people?**

Most of those who commented on Component 3 agreed with its inclusion. However, some called for it to be amended to include a reference to tourists and international visitors.

“On Component 3, I would hope this also brings benefits such as sustainable tourism - attracting not just Scottish nationals but other residents and visitors. Otherwise I agree.” – Individual

“Mention should be made of the international community, for reasons of: i) the importance of National Parks in the promotion of Scotland internationally, and in attracting visitors; ii) the international significance of the natural or cultural heritage of Scotland’s National Parks which, increasingly, can be accessed or learnt about using digital tools.” – James Hutton Institute

Dumfries and Galloway Council described the word ‘enjoyment’ as “personal” and “difficult to assess” and called for a less subjective term to be used.

#### **Component 4: How would National Park designation support the sustainable development and well-being of local communities?**

There was little consensus among comments on Component 4. The following separate points were made:

- Highland Council described Component 4 as particularly important, especially in relation to the availability and affordability of housing and access to high-quality transport infrastructure.
- Paths for All suggested that Component 4 could be broadened to include 'communities of interest' instead of 'local communities'. They also highlighted mental and physical health being enhanced by enjoying outdoor recreation as a key aspect of the component.
- The Royal Town Planning Institute Scotland called for Component 4 to include a reference to Community Wealth Building in order to increase clarity, coherence and alignment with other policies on this point.
- Two respondents pointed out inconsistencies between the language used in Component 4 and the National Parks Act. Galloway National Park Association and Campaign for a Scottish Borders National Park both highlighted that the relevant Aim in Section 1 of the Act states, "sustainable economic and social development of the area's communities" and advised that the wording of Component 4 should be amended to reflect this.

#### **Component 5: How would National Park designation support the sustainable use of the area's natural resources and how it would make a significant contribution to climate change mitigation and adaptation?**

Component 5 was well received; some respondents expressed agreement that National Parks have a key role to play in addressing and mitigating climate change. A few respondents considered Component 5 to be the most important component under Criterion 3, with one arguing that it should carry the most weight during the assessment of candidates.

However, one individual disagreed with the inclusion of Component 5, describing a National Park's ability to influence climate change as minimal. Another flagged that Component 5 may be incompatible with other assessment criteria in the framework.

"The wording of component 5 could give rise to conflict with the other components. For example, the imposition of wind farms and dams could be seen to help combat climate change but at the expense of local landscape, beauty, biodiversity and character." – Individual

#### **Additional components suggested**

Some respondents called for more recognition of an area's economic needs i.e. economic growth and job creation within Criterion 3, particularly for sectors like forestry and agriculture.

“It would be helpful to include a component on the economic needs of the area. There is potential for there to be benefits to business and individuals through enhanced tourism and other sectors. It is important that any national park helps to enhance the local economy as well as the environmental and social goals.” – Scottish Land & Estates

“An area’s agricultural output must always be considered when making decisions around national park status. We believe that food production and a thriving agricultural economy is crucial to many areas in Scotland. The creation of new national parks must not threaten this in favour of increased tourism or environmental protection. Scottish agriculture can deliver on food production, as well as environment and climate challenges only if it is enabled and supported to do so.” – NFU Scotland

A few organisations, including South of Scotland Enterprise and Scottish Campaign for National Parks, did not feel that socio-economic benefits were emphasised strongly enough under Criterion 3. They suggested that more could be done to highlight or promote this aspect.

“SCNP strongly supports this criterion, which reflects the overall principle of place-based policymaking as well as the aims set out in current National Park legislation. We have, however, detected a concern amongst some who have hitherto supported the designation of more National Parks that this appraisal framework as now presented plays down the socio-economic aim (and hence the potential benefits to local residents) relative to the others... Perhaps the sustainable socio-economic aspect could be better drawn out in accompanying guidance notes for nominations and reflected in the weighting of scores?” - Scottish Campaign for National Parks (SCNP) and Action to Protect Rural Scotland (APRS)

A small number called for the inclusion of a component that addresses depopulation and seeks to grow the human population within the National Park area.

Architecture and Design Scotland suggested that the following component should be added under Criterion 3: "How would National Park designation support collaboration between stakeholders, local and national, to the benefit of nature, people and places?"

## 6. Criterion 4: Visitor management and experience

Chapter 5 examines respondents' views on Criterion 4, which includes four components. This criteria asks whether visitor management and experience should be considered when assessing nominations for new National Parks. The criterion's components examine how proposed national parks would consider visitor enjoyment, education, understanding of nature and cultural heritage, as well as park management and infrastructure, and how the park would facilitate access to nature for the people of Scotland.

### Views on the criterion

Q7. Do you agree that 'visitor management and experience' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	155	90	6	5
Individuals	127	87	7	6
Organisations	28	100	0	0
- Interest organisations / Stakeholders	14	100	0	0
- Public sector bodies	10	100	0	0
- Built Environment / Land management	3	100	0	0
- Energy	1	100	0	0

A criterion for visitor management and experience was supported by 90% of those answering Q7, making this the third highest rated of the seven criteria. All organisations agreed with this criterion, as did 87% of individuals.

### Supportive comments

Q7 received 26 open responses, some of which were positive. Respondents agreed that visitor management and experience should be a criterion for assessing nominations for new National Parks. They stressed that this should consider how the area would manage increased visitor numbers, but also how a park will ensure visitors enjoy the spaces and understand the area's history and cultural heritage.

"We agree with this criterion because it allows an area bidding for a National Park designation to explain how they will manage visitor numbers where they are already high, or conversely, allow an area to explain how visitors will be attracted to an area which they currently overlook." – John Muir Trust

“A component that takes into consideration how the National Park designation will enhance opportunities for enjoyment, recreation and understanding of the area’s natural and cultural heritage is essential to the appraisal of any proposed National Park.” - ScottishPower Renewables

Other respondents supported visitor management strategies, highlighting the potential damage increased traffic could cause to the local environment, wildlife and farms.

### Reasons for disagreement

Respondents who disagreed with the criterion and provided a reason suggested that visitor management had not been effective in the other National Parks in Scotland, as described in the analysis of Criterion 1.

### Views on the components

Q8. Do you agree with the components of criterion 4 (visitor management and experience)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: How would National Park designation enhance opportunities for enjoyment, recreation and understanding of the area’s natural and cultural heritage?	154	90	6	4
Component 2: How would National Park designation support visitor management in the area?	154	88	6	6
Component 3: How could National Park designation support current and potential future transport infrastructure in and around the proposed area?	154	86	6	8
Component 4: How could National Park designation support access to nature for Scotland’s people?	155	87	8	5

There was broad support for each of the four components of Criterion 4, ranging from 86% for Component 3 to 90% for Component 1. Both individuals and organisations expressed their support, though there were some small variations in organisation support. Components 1 and 2 were supported by 93% and 96% of organisations respectively. However, support was slightly lower for Components 3 (85%) and 4 (82%). In these latter two instances, a few organisations either disagreed or were unsure of the components, but no single organisation or organisation type consistently expressed a concern.

There were 41 open text comments in response to Q8.

### **Component 1: How would National Park designation enhance opportunities for enjoyment, recreation and understanding of the area’s natural and cultural heritage?**

Some respondents agreed with Component 1, but suggested further considerations or amendments to the wording. These included consideration of:

- An area’s contribution to a just transition to net zero.
- Commitment to nature recovery.
- The value a place has in changing perceptions or challenging behaviours to support future sustainability.
- How a new national park will encourage visitors to understand the interaction between the built and natural landscapes.

### **Component 2: How would National Park designation support visitor management in the area?**

Only a few respondents provided feedback on Component 2. While Highland Council noted their appreciation of the inclusion of the component and highlighted its importance in the assessment process, an individual and Perth and Kinross Council asked for explicit instruction about how the area would manage increased visitors to be included in the language of the component.

### **Component 3: How could National Park designation support current and potential future transport infrastructure in and around the proposed area?**

Many respondents had comments about Component 3. While most agreed with the component, some suggested clarifications or additions, such as an emphasis on green or eco transport infrastructure and education for all visitors on how to safely and sustainably enjoy and engage with the natural environment.

“A key driver for many will be 'visitor management' with some areas of Scotland under significant pressure creating negative visitor experiences. Fortunately in most of [Southwest] Scotland this is not such an issue and actually opens up an opportunity to demonstrate how by instigating the right infrastructure and visitor management from the outset the visitor experience can be enhanced in a way that brings about genuine community wealth building opportunities. A key aspect of this must be around education for all ages in how to experience the rural environment in safe and sustainable way.” - Galloway and Southern Ayrshire UNESCO Biosphere

Other suggested considerations included an emphasis on creating good pathways and travel routes throughout the park and investment in ranger services.

“We agree that transport infrastructure is of importance. However, so are other aspects of infrastructure for supporting visitor management (e.g. public conveniences, footpaths, signage), and emerging infrastructure (e.g. high speed mobile broadband across rural areas which will enhance visitor experience and Park management).” - James Hutton Institute

The Scottish Rewilding Alliance disagreed and highlighted that consideration should be given to the impact of future transport infrastructure on nature. They suggested mitigating new developments with ecoducts or co-locating railway tracks with roads to minimise disruption to the wildlife and natural landscape.

“Ecological connectivity is a crucial factor in the recovery of nature. Where the connectivity of landscapes is interrupted by human infrastructure, this can prevent the free movement of species, destroy habitats, create pollution and cause wildlife casualties. Therefore, when considering the current and potential future transport infrastructure that a National Park designation might support, the effect on nature throughout the potential park area should also be considered alongside equitable access for residents and visitors. This might include adding to existing infrastructure corridors rather than creating new ones - by co-locating new railway tracks with roads, for example. It could also include mitigating the effect of existing and new infrastructure through initiatives like ecoducts.” - Scottish Rewilding Alliance

#### **Component 4: How could National Park designation support access to nature for Scotland’s people?**

A few respondents suggested that access to nature should include ways to address inequalities, emphasising that inclusion all be considered alongside this component. A few others noted that cultural heritage should be included in this component.

Given the emphasis that some placed on the importance of nature, a few respondents argued that Component 4 should be prioritised as Component 1 under this criterion.

#### **Other recommendations**

A small number of respondents highlighted the importance of understanding where funding for possible major infrastructure changes would come from.



## 7. Criterion 5: Added value

This chapter examines Criterion 5 and its two components. It asks for opinions on whether added value should be a criterion for assessing new National Parks. The components would ask applicants to show how their proposed National Park would justify the investment in creating and managing a park, and the value it would bring to the area.

### Views on the criterion

Q9. Do you agree that 'added value' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	155	72	17	11
Individuals	127	69	19	12
Organisations	28	86	7	7
- Interest organisations / Stakeholders	14	71	14	14
- Public sector bodies	10	100	0	0
- Built Environment / Land management	3	100	0	0
- Energy	1	100	0	0

Seven in ten respondents (72%) who answered Q9 agreed with a criteria of added value. While this is still a high level of agreement, Criterion 5 recorded the lowest level of agreement of the seven criteria. Agreement was lower among individuals than for other criteria, with 69% agreeing, 19% disagreeing and 12% unsure.

Among organisations, 86% agreed that added value should be a criterion. The only organisations who did not agree were all in the interest organisation / stakeholder category; The National Trust for Scotland and Scottish Rewilding Alliance disagreed, and John Muir Trust and the joint response from Scottish Campaign for National Parks (SCNP) and Action to Protect Rural Scotland (APRS) were unsure.

### Supportive comments

There were 44 comments in response to Q9. A few respondents noted they supported the criterion as long as added value was defined widely and not limited to financial value. Another suggested adding a caveat to include value for residents and visitors.

Along with concern about concepts of value and who or what should benefit from the park, a few comments questioned the word 'added', noting that there is a reciprocal beneficial relationship between a National Park and the area or community surrounding it.

“Whilst agreeing with the Criterion, we note that the term 'added value' is not entirely appropriate. The current importance and values of an area may be a sufficient basis for designation, onto which designation leads to further value being gained. An alternative terminology should be considered.” – James Hutton Institute

A small number of organisations stressed the importance of ensuring that investments consider the overall cost and the impact on businesses and communities. One individual agreed but noted that many good projects have been left unfinished due to the ‘inability to construct a whole investment case’.

“Yes, we strongly believe that nominees for new national parks must set out the merits of designation compared to existing or other approaches. A national park has to demonstrate what it can deliver for businesses, communities, and people over and above existing policies and legislation. These benefits must outweigh the threats, perceived or otherwise. This is crucial if national park authorities are to bring local communities on board with the national park process.”- NFU Scotland

Highland Council supported the criterion as it would enable environmental investment.

“Many of Highland’s most important areas for nature and landscape have not seen significant investment in habitat/species management or visitor management more generally. It is unlikely that this position will change without special status/national designation and additional /existing resources prioritized accordingly.” – Highland Council

Dumfries and Galloway Council suggested that added value should be viewed from a local perspective and across all sectors, ensuring a new National Park provides the greatest benefit to the locality. Galloway and Southern Ayrshire UNESCO Biosphere agreed with this criterion as a way to judge whether National Park designation would be best in contrast to other designations, such as UNESCO Biospheres, which may offer better value for investment depending on the area.

### **Reasons for disagreement**

Many respondents who disagreed highlighted their dislike of the term added value, often due to their interpretation of this as monetary value or financial gain. Some noted the value National Parks can bring to nature, the environment and biodiversity as a top priority, as described in Chapter 3. Some others, all individuals, dismissed the concept of added value as being irrelevant to the primary purpose of National Parks.

“Creating a new national park will bring inherent value in the designation alone, I think the foreword quite clearly outlines that a new national park will prove beneficial across the board and help towards our climate goals.” – Individual

“Not my idea of the main purpose of a national park.” – Individual

“Added value is benefit, but cost neutral or even a small cost to provide an area of outstanding significance is fine.” - Individual

## Defining added value

Many respondents, whether they agreed, disagreed or were unsure about the criterion, suggested that a clearer definition of added value was necessary. Respondents noted that value, even financial value, could speak to a number of different outcomes. They asked for clarity about whether it was intended to be financial – and if so, for whom – or whether value could also speak to environmental, social, or cultural heritage concerns.

“I put don’t know because I don’t disagree but want to be sure that ‘value added’ is not a simple measurement of financial gain; it has to be about other, often more important gains such as protecting the future of life on this planet.” – Individual

“I think ‘added value’ should be a criteria but what are the criteria for "added value"? Is it financial, and if so to whom - residents, investors, Treasury under English law which gets the taxation and keeps it to spend on Westminster expenses. Is it environmental? Is it health and wellbeing benefits to those who live there and those who visit - and how will you measure this? GDP is a poor measure of anything, and the kind of benefits that really matter are not easily defined or measured, or even known unit after the changes are in place. Unintended consequences can be good as well.’ – Individual

## Views on the components

Q10. Do you agree with the components of criterion 5 (added value)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: How would the benefits of a National Park in the area justify the investment required?	153	76	13	11
Component 2: What is the added value that National Park designation would bring to the area?	151	72	17	11

Three quarters (76%) agreed with Component 1, with relatively similar levels of agreement among individuals (76%) and organisations (74%). However, only two organisations disagreed - The National Trust for Scotland and Scottish Rewilding Alliance – with the remaining five organisations answering ‘don’t know’.

Component 2 was supported by 72%, which was the lowest level of support recorded across all components. Individuals were less likely to agree than organisations - 71% and 78% respectively. Again only two organisations disagreed - Comhairle nan Eilean Siar and Scottish Rewilding Alliance – with the remaining four organisations answering don’t know.

There were 47 comments in response to Q10. However, many commented on the clarity of the wording of both the criterion and the components, specifically the language around ‘added value’ as discussed above, rather than the individual components.

### **Component 1: How would the benefits of a National Park in the area justify the investment required?**

Only a small number of respondents commented on Component 1. Those who did made one of the following two suggestions:

- In order for applicants to be able to justify the investment required, they will need to be provided with an approximate cost of a new National Park.
- Rather than understanding the investment in terms of the benefit it may bring to the surrounding area, also consider whether an area has enough investment to protect the natural environment from the impacts of a new National Park.

### **Component 2: What is the added value that National Park designation would bring to the area?**

The few respondents who commented on Component 2 suggested:

- Consideration should be given to assessing unforeseen negative impacts on some sectors, such as housing stock and land values.
- Component 2 would be a good place to explain and further define the term added value.

### **Other comments**

Some respondents suggested further considerations for the criterion and components as a whole. These included:

- Requests to broaden the language used, including highlighting the value a new National Park would bring to the nation.
- How investment will be used to bring in further investment, as well as the potential loss of investment such as in local businesses that run and maintain windfarms.
- Providing a clear understanding of a funding plan.

## 8. Criterion 6: Local support

Criterion 6 examines the importance of considering local support in assessing a new National Park. There are two components of this criterion that clarify that interest in local support includes local interests, such as community bodies, landowners, businesses, public bodies and third-sector organisations, as well as support from local authorities.

### Views on the criterion

Q11. Do you agree that 'local support' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	157	77	14	9
Individuals	128	73	17	9
Organisations	29	93	0	7
- Interest organisations / Stakeholders	15	87	0	13
- Public sector bodies	10	100	0	0
- Built Environment / Land management	3	100	0	0
- Energy	1	100	0	0

A criterion assessing local support was supported by three quarters (77%) of those answering Q11, making this the second lowest rated of the seven criteria. Support was lowest among individuals; 73% agreed, 17% disagreed and 9% were unsure. Among organisations, however, 93% agreed and no organisations disagreed. Two were unsure – James Hutton Institute and Scottish Rewilding Alliance.

### Supportive comments

42 respondents commented at Q11; many agreed, but only some gave detailed reasons why. These respondents noted that people living and working in or around the proposed area need to agree with the plan and benefit from creating the new National Park.

“Local communities, landowners, local authorities and a wide range of stakeholders all play an essential role in the conservation and promotion of the historic environment and cultural heritage more widely. Local support is essential in ensuring the success of a National Park.” – Historic Environment Scotland

NFU Scotland noted the importance of considering “cross-sectoral and cross-community views and not just the view of those who put forward the nomination” to ensure that, whatever the outcome, parts of the community are not left feeling left out or ignored. Scottish Borders Council agreed it was important to also solicit opinions from those in opposition, and at Q16 – Do you have any other comments? - another individual

requested there be a specific place for people who are against a proposed National Park to register their concerns.

### Reasons for disagreement

All those who provided further detail about their opposition to the criterion were individuals. A few highlighted a worry that local opinions could be swayed by lobbyists or interest groups. A few others disagreed because they believed a National Park is in the national interest and therefore creating one should not be based entirely on local opinion.

“There's the danger that this puts the decision into the hands of lobby-groups, giving the illusion of consensus when only a tiny proportion of the population have been informed or consulted.” – Individual

“I am concerned about how to achieve a balance between doing what we must to safeguard the future of all life and the needs of locals. A big worry is the vested interests of planet-wrecking, wealthy landowners who have already decimated their vast areas of land. They must not be permitted to place their greed and lack of proper stewardship over the needs of ordinary people and the need to restore biodiversity.” - Individual

### Views on the components

Q12. Do you agree with the components of criterion 6 (local support)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: What level of local support (with evidence) is there from local interests (community bodies, landowners and managers, businesses, third sector organisations, public bodies etc).	157	73	17	10
Component 2: What level of support (with evidence) is there from the local authority/authorities in the area?	157	72	15	13

The two components of Criterion 6 recorded the lowest levels of support across the framework, with 73% agreeing with Component 1 and 72% agreeing with Component 2. In both cases, agreement was lower among individuals than organisations; 69% and 93% respectively for Component 1 and 69% compared to 86% for Component 2.

It should also be noted that no organisations disagreed with either component. All those who did not agree indicated they were unsure.

There were 47 open comments in response to Q12.

**Component 1: What level of local support (with evidence) is there from local interests (community bodies, landowners and managers, businesses, third sector organisations, public bodies etc).**

Some respondents provided feedback on Component 1. A few asked for a clearer understanding of who would be classified as local under this component. For example, would landowners or business owners who lived remotely or in another country be considered? Another individual asked for clarity about what support meant.

“Guidance could be given as to what would constitute evidence of local support - e.g. online surveys, village hall meetings, opportunities to comment in local libraries, etc.” - The National Trust for Scotland

A request for robust local representation, capturing a multitude of views, both positive and negative, was requested by a few respondents. The National Trust for Scotland pointed out that this aspect of the submission would be the most costly as it required wide community consultation, e.g. publicity, engagement, and collation and analysis of responses, and questioned whether the Scottish Government would provide financial support for this. One individual stressed that business interests should not dictate environmental or biodiversity concerns.

**Component 2: What level of support (with evidence) is there from the local authority/authorities in the area?**

There were mixed views from several respondents in response to Component 2.

Of those who agreed, a few wanted further clarification on what information councils should supply in support of their application and how they would make it clear whether they support the nomination for all or only part of their area. Scottish Campaign for National Parks (SCNP) and Action to Protect Rural Scotland (APRS) noted that there could be competing or conflicting interests within local authorities. For example, it is possible that local authority may be the site of several, competing nominations. While these respondents supported the consideration of local authority positions, there was concern that putting too much weight on local authorities' opinions may stop the development of otherwise well-supported nominees.

“We feel that unequivocal Local Authority support at the nominations stage should not be required for a nomination to succeed, as reluctance to provide such whole-hearted backing may be motivated by a whole range of factors, some of which may have little to do with the long-term best interests of the area.” - Scottish Campaign for National Parks (SCNP) and Action to Protect Rural Scotland (APRS)

Among those who disagreed or were unsure about the component, the main concern was that local authorities could take a different position than the people or organisations in their area. They argued that a local authority's view was superfluous as councils should represent the same opinions as those sought in Component 1.

“We have selected ‘don’t know’ in response to Component 2 because whilst we recognise that Local Authorities are democratically elected, and in most areas we would expect Local Authority support for a bid, there could be cases where the Local Authority might not support a bid but there is local community support for a bid. In those instances, we don’t think Local Authority opinion should sway an outcome for a designation. There are examples where this has happened in the past. In 2013, a North Harris National Park proposal didn’t proceed because the Local Authority objected. The Local Authority will have a view on a designation, so it would always be beneficial as part of the process, to consult the Local Authority, but not for the Local Authority view to sway the final decision.”  
- John Muir Trust

### **Balancing interests**

There were concerns from several about how to balance the different interests of people involved. For example, a few posed questions around how national importance should be measured against local importance, how a loud minority opposition could be considered against a quieter supporting majority, and how business interests could be weighed against individual perspectives.

“This support is highly desirable and should be sought by applicants. However, there is inevitably a mix of views regarding designation of an area as National Parks, and, not infrequently, those opposed are vehement in their opposition, perceiving adverse consequences for their livelihoods or property or privacy. Consequently, my view is that this support should be sought, but that the weight given to it in the assessment process should be flexible; it should not be a factor that, if absent or incomplete, reduces the chances of being considered.” - Individual

“However, there is the need to balance the range of views to a national park designation to come to a determination against the wider national aspirations in term of the delivery of national outcomes designation would potentially bring.” – Scottish Borders Council

### **Less commonly mentioned themes**

As with most criteria, some respondents highlighted that environmental protection should be prioritised over local support.

The Royal Town Planning Institute Scotland mentioned that evidence should include “policies set out in emerging Regional Spatial Strategies and community-led plans or policies, including emerging Local Place Plans.”

One individual suggested that the government should work with local communities to help build the National Park vision.



## 9. Criterion 7: Strategic contribution

Assessment of the strategic contribution of a new National Park is considered in Criterion 7. This includes five components that cover a range of environmental, ecological and biodiversity considerations.

### Views on the criterion

Q13. Do you agree that 'strategic contribution' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know
<b>All answering (%)</b>	156	91	8	1
Individuals	128	91	8	1
Organisations	28	89	7	4
- Interest organisations / Stakeholders	15	87	13	0
- Public sector bodies	10	90	0	10
- Built Environment / Land management	2	100	0	0
- Energy	1	100	0	0

A criterion assessing strategic contribution was the joint highest rated of the seven criteria, with 91% of those answering Q13 agreeing this should be included. Agreement was high among both individuals (91%) and organisations (89%), with only three organisations not in agreement - The National Trust for Scotland and Galloway National Park Association disagreed, and Crown Estate Scotland was unsure.

### Supportive comments

32 respondents commented at Q13. While many agreed with the proposed criterion in the closed question, only a few left comments explaining their support. These respondents noted the importance of using National Parks to show how natural landscapes can be preserved and protected, increase biodiversity and used to help mitigate climate change.

"Hopefully this criterion captures the role of National Parks as exemplars, and how an increased number of National Parks 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." - Scottish Environment LINK

NFU Scotland also agreed, but noted that the success of integrating different land users into a sustainable vision for agriculture would be dependent on the funding allocated.

### Reasons for disagreement

Some respondents explained their opposition to the criterion. A few were critical of how the creation of the two existing National Parks had been managed, as well as their current

management. Individuals cited increased development of the areas and negative impacts on local populations, such as decreased wages, as their reasons for disagreeing. A few others disagreed because they thought National Park status would not effectively help environmental issues.

“The scale feels wrong. There's an urgent need to empower (i.e. fund) local communities to properly manage their environments - there's little evidence that National Park status achieves this.” – Individual

Other reasons for disagreeing included a request for further clarification of the criterion, including guidance on existing powers and budgets. The National Trust for Scotland disagreed with the criterion, requesting that it should also consider cultural heritage.

## Views on the components

Q14. Do you agree with the components of criterion 7 (strategic importance)? If you disagree, please give reasons for your answer.

All answering for each component:	n=	% Agree	% Disagree	% Don't know
Component 1: How could National Park designation support the area's leadership on climate change mitigation and adaptation in a way that is fair and inclusive for local communities?	154	87	8	5
Component 2: How could National Park designation support the area's contribution to commitments within the Scottish Biodiversity Strategy, including ecosystem restoration, protection and recovery of vulnerable species, wildlife management, nature friendly farming, the expansion of areas that are protected for nature and the development of nature networks?	152	88	6	6
Component 3: How could designation as a National Park support sustainable investment in the area's natural capital?	153	84	10	7
Component 4: How could designation as a National Park support the development of green skills and jobs in the area?	153	89	7	4
Component 5: How could designation as a National Park complement the contribution that Scotland's existing National Parks make to tackling the nature and biodiversity crises?	151	91	5	4

Support for the five components of Criterion 7 varied from 84% for Component 3 to 91% for Component 5. In all cases except Component 4, individuals were slightly more likely than organisations to agree.

There was no consistent pattern among the organisations who disagreed with or were unsure about specific components. For example, Component 3 was the lowest rated of the five components by organisations, with 79% agreeing. However, of six organisations who did not agree, Scottish Rewilding Alliance and Historic Environment Scotland disagreed, while Crown Estate Scotland, Built Environment Forum Scotland, Paths for All and Perth & Kinross Council were unsure.

### **Component 1: How could National Park designation support the area's leadership on climate change mitigation and adaptation in a way that is fair and inclusive for local communities?**

Some respondents commented specifically on Component 1. A few felt the aims of the component needed to be clarified. One individual stated that while it was a laudable aim, it was not particularly relevant to National Parks and should not be in the assessment.

Other concerns each mentioned by one respondent included:

- Questions about procedures for areas containing existing wind farms (see Q16).
- An acknowledgement of the benefits of community land ownership and further information on redressing imbalances and ambiguity of land ownership in Scotland.
- A request that the component consider businesses as well as individuals.
- A desire for applications to emphasise how new National Parks will bring additional benefits to what landowners, farmers and crofters are already trying to achieve in terms of climate change mitigation.

### **Component 2: How could National Park designation support the area's contribution to commitments within the Scottish Biodiversity Strategy, including ecosystem restoration, protection and recovery of vulnerable species, wildlife management, nature friendly farming, the expansion of areas that are protected for nature and the development of nature networks?**

Some respondents critiqued Component 2 as attempting to address something that should be of greater national importance. One individual respondent suggested that the biodiversity crisis cannot be fixed through new National Parks, and another highlighted that rewilding and biodiversity restoration should be part of a national wildlife campaign.

Perth & Kinross Council stated that Components 2, 3 and 4 in Criterion 7 overlapped with the components of Criterion 3, or 'meeting the special needs of the area'.

### **Component 3: How could designation as a National Park support sustainable investment in the area's natural capital?**

Of the respondents who provided further comment on Component 3, most disagreed due to concerns over the concepts of natural capital and sustainable development, which these respondents distrusted.

“What is 'sustainable investment'? Many industries make misleading claims. Who assesses sustainability?” - Individual

Scottish Land & Estates supported Component 3 and suggested that land managers be shown the long-term benefits of green finance.

#### **Component 4: How could designation as a National Park support the development of green skills and jobs in the area?**

Respondents who provided a comment about Component 4 tended to be split as to whether they agreed or disagreed. Those who agreed supported the increased development in green skills, which one anonymous organisation suggested was a skills gap across the UK. South of Scotland Enterprise supported the component as a way to engage the community and allow for further investment.

“The creation of green skills and jobs in the area can be maximised by engagement with the community to identify benefits which can be found through the designation. Opening the opportunity to engage with the possibilities enables community, social and private enterprises to plan ahead and be in a great position to reap the benefits when they come.”  
- South of Scotland Enterprise

A few respondents disagreed with the inclusion of Component 4 as they thought the term green skills and jobs had become empty of meaning. Another individual argued that not everything had to be focused on green economies all the time.

A few suggested, as with Components 2 and 3, that this was covered by Criterion 3.

#### **Component 5: How could designation as a National Park complement the contribution that Scotland's existing National Parks make to tackling the nature and biodiversity crises?**

Only one respondent commented on Component 5, stating that it should be considered a part of Component 2.

#### **Other themes**

A few respondents noted concern about prioritising economic benefits from new National Parks. While not all respondents provided further details, Scottish Rewilding Alliance thought that community benefit should be the overall priority.

“National parks are well placed to navigate these investment opportunities - but should do so with communities in mind. There should be community benefits from the millions of pounds in funding flowing through our landscapes beyond the restoration of nature. Where land generates value in the form of ecosystem services, money should also flow back into local communities. In the long term, this creates thriving communities whose lives are interwoven with nature. Rewilding and reepling should go hand in hand, especially in our national parks.” - Scottish Rewilding Alliance

A desire to prioritise national and international interests over regional interests was raised by two respondents. Conversely, one individual thought a new National Park could have value to only a region.

A few respondents suggested that the goals and aims of a wellbeing economy should be included, such as health and happiness.

Other considerations each mentioned by one respondent included:

- Putting greater emphasis on socio-economic benefits.
- Including components that consider affordable housing.
- Ensuring new National Parks are inclusive for those who may be older and less mobile or those who are less often National Park users.
- Historic Environment Scotland asked for consideration of how “the creation of a new National Park could contribute to the aims of ‘A Culture Strategy for Scotland’ and ‘Our past, our Future’.”
- Scottish Borders Council mentioned that new National Parks should “build on current local/regional activity such as RLUP<sup>1</sup> pilots”.

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<sup>1</sup> Regional Land Use Partnerships are partnerships facilitating collaboration between local and national government, communities, landowners, land managers, and wider stakeholders to take a more effective and collaborative approach to land use planning and to meet the challenge of climate and environment targets and support economic recovery and renewal.

## 10. Scoring and other considerations

This chapter presents the analysis of responses to Q15 and Q16. These two questions had a broader scope than the rest of the consultation. Q15 asked respondents for their views on the overall scoring process, while Q16 provided an opportunity for respondents to provide any other comments on the draft Appraisal Framework.

Q15. 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?

### Environmental concerns are paramount

81 respondents answered Q15. In line with the recurring theme noted under Criterion 1, many respondents suggested that environmental considerations, such as ecological preservation, climate mitigation and biodiversity protection should be given priority in the scoring process. While some also called for cultural and social heritage to be prioritised, others thought that the benefits new National Parks would bring to the environment should be the top concern.

“Given the lack of land and sea area where non-human interests are prioritised, please weight selection criteria of the national park to non-human beneficiaries.” - Individual

### Scoring process

Several respondents commented on the process of scoring applicants. A few respondents each suggested letting stakeholders decide or letting the public decide via a vote, for example. Others raised more specific concerns. A small number suggested that statisticians should be involved in the process, while a few others mentioned a distrust of quantitative scoring, instead proposing a more qualitative scoring process, such as: very good, good, fair, poor.

A small number requested clarity on how criteria that seemed to overlap would be assessed. Areas of overlap between Criterion 3: Meeting the special needs of the area and other criteria in the Appraisal Framework were highlighted by a few organisations, particularly between Criterion 3, Criterion 7: Strategic contribution and Criterion 5: Added value. Perth and Kinross Council suggested re-ordering the criterion to enable a direct comparison between similar fields, and Scottish Environment LINK questioned how the assessment framework will address the potential duplication or double scoring of overlapping criteria.

Perth and Kinross Council, Highland Council and Mineral Products Association Scotland provided specific requests for weighting the criteria. However, they expressed different priorities. Perth and Kinross Council and Mineral Products Association of Scotland believed Criterion 6: Local support should be the top priority. Highland Council believed that Criterion 1: Outstanding national importance was the top priority with Criterion 6: Local support the second most important.

Scottish Land & Estates emphasised the importance of balance:

“As with all of these issues there is a requirement for balance. There should be a minimum score required for each of the outcomes. e.g. Getting 100% in 5 areas and 10% in 2 should not be favoured over a more balanced score which meets all of the outcomes but to a lesser extent. The success of a new park will be reliant on it bringing a range of benefits, both locally and nationally.” - Scottish Land & Estates

### **Transparency in the application process**

Transparency was highlighted by several as necessary for a fair assessment of applications. Some respondents mentioned that the criteria need to be clarified and the weighting and scoring structure available to applicants before they apply. Some others suggested publishing the criteria and scoring procedures publicly, while another individual requested the publication of all submissions.

“The scoring methodology should be clearly explained to ensure that it can be understood by all, and this should possibly be supported by further consultation. There is likely to be a high degree of cross over between the criteria identified in the Appraisal Framework (e.g., 3 and 7) and it will be important to ensure that any assessment methodology is able to be clearly applied to criteria where there may be a lack of transparency because of the similarity of the criteria and their components. It should be clear from the appraisal framework how the different components will be weighted in the decision-making process, particularly where there may be conflicts between components.” - Crown Estate Scotland

In Q16, respondents asked for clarity on the application itself, including information on what support will be provided by the Scottish government, word counts, and clear guidance notes to assist completion.

### **Local people and communities**

In Q15 and Q16, some respondents reiterated the importance of including local people and local voices in the application process. Some requested that local concerns be prioritised over other factors in the scoring process. Others emphasised that this should reflect the views of local people and communities, rather than local government.

“While local government/third party support (businesses) is important, I would like to stress that this should not be taken as more important than the needs and wishes of the local community. They should be acting in the best interests of said local community and not for their own political/financial gain.” - Individual

When commenting on questions about Criterion 6: Local support, some respondents questioned the application process and asked for transparency about how data would be collected, how decisions would be made and how applications would be scored. A few wondered what would constitute evidence of support and how support should be captured to ensure competing views are represented.

“It is not clear from the criterion or components how support can be sought and demonstrated equitably. There will be many competing views on whether there should be a national park in a particular area, what such a designation ought to mean and how the park should operate. National parks, by their nature, have to operate in a context of local and national interest, so while it is right that local stakeholders should be empowered through this process, consideration should be given to how views are sought and coordinated.” - Scottish Rewilding Alliance

There was an interest in understanding how support would be considered, and if, for example, local authorities' opinions would carry greater weight.

### **Additional suggestions**

The following considerations were mentioned by one participant each:

- There should be greater inclusion of charities in the scoring and assessment process, specifically wildlife or ecologically focused organisations.
- Natural environments located within cities should also be considered.
- Distinctiveness of the landscape should be prioritised.
- Whether a place can cater for and include everyone.

Q16. Do you have any other comments that you would like to make about the draft appraisal framework and nominations process for new National Parks?

A total of 79 respondents answered Q16. However, many took the opportunity to reiterate points which have been described earlier in this report. For example, the most prevalent theme, mentioned by several respondents, again stressed that environmental concerns should be a top priority in the assessment process. Specifically at Q16, a few suggested that existing National Parks have not sufficiently protected the environment and were therefore opposed to new parks.

To avoid repetition, the analysis below focuses on points or themes that have not already been covered.

### **Supportive comments**

Broad, positive comments were submitted by some respondents, reflecting their support for new National Parks and expressing gratitude for the chance to comment on the framework. One individual supported the consultation on a draft framework and emphasised the importance of engaging younger populations in Scotland.

“This is a fantastic long overdue opportunity to invest in the natural and cultural heritage of Scotland in a way that will bring about meaningful benefits to rural communities, businesses and the wider environment. We need to ensure that the approach taken is modern and forward-thinking, recognising the interdependencies between people and nature that will ensure future generations look back on this as a turning point that resulted in a rebalancing of the ecosphere.” - Galloway and Southern Ayrshire UNESCO Biosphere



## Negative comments

Concerns about, and objections to, the creation of new National Parks were noted by some. These comments typically reiterated the sentiments noted throughout this report, though two respondents were critical of the consultation and the wording of the framework.

“Please consider very carefully why you are doing this. Remember, small is beautiful and thinking big like this while passing control to institutions like this is one of the causes of the problem. It should not be regarded as a good idea. Where I live we are surrounded by 'designations' policed by Quangos [quasi-autonomous NGO].” – Individual

## Windfarms

At various points throughout the consultation, including at Q16, the small number of energy organisations who responded highlighted issues that could arise if a new National Park as a wind farm within its boundaries. These responses described the need for renewable energy infrastructure in Scotland and called for further clarity about the acceptability of existing wind farm infrastructure and land use within a new National Park. They cautioned that if wind farms are not permitted within a new National Park, there needs to be clarity about whether existing turbines would need to be dismantled, and consideration given to potentially losing a significant portion of Scotland’s renewable energy generation.

“New National Parks will potentially contain wind farms, whether going through the planning system, under construction or at some stage through their operational lifetime. It is still unclear what approach will be taken to wind farms within or adjacent to new National Parks. SPR understand that the approach may depend on what nominations come forward, and whether these proposed parks contain any renewables, however, there needs to be thinking put into how this will be handled to ensure that Scottish Government can adequately engage the renewables industry to find acceptable policy solutions.” - ScottishPower Renewables

“At present, the Appraisal Framework encourages consideration of the positive gains that a National Park nomination could bring. We suggest that a criteria is added that offers a clear opportunity for consideration of the negative implications of a National Park nomination to allow for balanced approach. We also suggest that a criteria is added that requires consideration of any resulting conflict with NPF4 policies.” - RWE Renewables

## Additional suggestions

The John Muir Trust offered a simplified framework where applications are measured against two criteria: “a) The potential for the land to be managed in an exemplary way to protect and restore our finest wild places. The park must be based on a thriving natural ecosystem; and b) The strength of interest and support from the local community for the area to be designated based on an appreciation of the added visitor numbers and associated economic opportunities that the designation would bring.”

Collaboration was emphasised as an important criterion for measuring applications against by a few, including Architecture and Design Scotland.

# 11. Conclusions

Many individuals and stakeholders with detailed knowledge took part in the consultation, sharing their views on the draft Appraisal Framework, which will be used to assess candidates for a new National Park. Reflecting their experience and perspectives, this report provides a high-level summary of the consultation responses. For more detail, readers are encouraged to look to individual responses where permission was given for publication<sup>2</sup>.

Analysis of the closed questions indicates a high level of overall support for the seven criteria in the draft Appraisal Framework. The table below shows that all criteria were supported by at least 70% of respondents, with three supported by more than 90%. Similarly, each of the 22 components of the criteria was supported by between 72% and 94% of respondents, with most organisations in agreement.

<b>Package</b>	<b>% agree</b>
Criterion 1: Outstanding national importance	88
Criterion 2: Size, character and coherence	85
Criterion 3: Meeting the special needs of the area	91
Criterion 4: Visitor management and experience	90
Criterion 5: Added value	72
Criterion 6: Local support	77
Criterion 7: Strategic contribution	91

Open comments highlighted a mix of views, with respondents providing both reasons for and against different elements of the Appraisal Framework. Supportive comments typically agreed that the criteria were aligned with the aims of National Parks, with some suggesting how they could be improved further. There were calls for both broader and narrower criteria, and for some, there was an appeal to prioritise environmental considerations over other potential assessment criteria.

In several cases, respondents requested clearer definitions of the criteria or component wording, or for more detail to be provided. This was particularly evident for Criterion 5: Added value and Criterion 6: Local support, and for components considering cultural heritage and the size of a proposed National Park. Some terms were considered to be too subjective or difficult to assess. While alternative suggestions were sometimes provided, there was a desire for clear definitions and guidance to ensure candidates have a consistent understanding of what evidence is required when they apply.

Overall, the key message was that, with some refinement, there is widespread support for the draft Appraisal Framework. The findings from the analysis will be used by the Scottish Government to revise and finalise the Appraisal Framework which will then be published ahead of the nominations phase of the selection process.

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<sup>2</sup> Responses are published on the [Scottish Government's consultation website](#).

# Appendix A: Quantitative Analysis

This appendix provides more detailed breakdowns of the 29 quantitative closed questions included in the consultation.

The tables for each question show:

- The number of respondents from the total sample of 165 respondents who selected each response, and the corresponding percentage.
- The number and percentage response among those **who answered each question**, broken down by:
  - Individual and organisation responses.
  - By type of organisation.

Please note that the row percentages may not add to 100% due to rounding.

## Criterion 1: Outstanding national importance

Q1. Do you agree that 'outstanding national importance' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	138	14	5	8
All respondents (%)	165	84	8	3	5
<b>All answering (%)</b>	157	88	9	3	-
Individuals	129	86	10	4	-
Organisations	28	96	4	0	-
- Interest organisations / Stakeholders	14	93	7	0	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

Q2. Do you agree with the components of criterion 1 (outstanding national importance)? If you disagree, please give reasons for your answer.

**Component 1:** Is the proposed area of outstanding national importance due its natural heritage, including biodiversity, geodiversity and landscapes?

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	139	13	4	9
All respondents (%)	165	84	8	2	5
<b>All answering (%)</b>	156	89	8	3	-
Individuals	128	88	9	3	-
Organisations	28	93	7	0	-
- Interest organisations / Stakeholders	14	93	7	0	-
- Public sector bodies	10	90	10	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

**Component 2:** Is the proposed area of outstanding national importance due to the area's cultural heritage, including the historic environment?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	114	21	14	16
All respondents (%)	165	69	13	8	10
<b>All answering (%)</b>	149	77	14	9	-
Individuals	121	73	16	12	-
Organisations	28	93	7	0	-
- Interest organisations / Stakeholders	14	93	7	0	-
- Public sector bodies	10	90	10	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

## Criterion 2: Size, character and coherence

Q3. Do you agree that 'size, character and coherence' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	132	19	4	10
All respondents (%)	165	80	12	2	6
<b>All answering (%)</b>	155	85	12	3	-
Individuals	127	83	14	3	-
Organisations	28	96	4	0	-
- Interest organisations / Stakeholders	14	100	0	0	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	67	33	0	-
- Energy	1	100	0	0	-

Q4. Do you agree with the components of criterion 2 (size, character and coherence)? If you disagree, please give reasons for your answer.

**Component 1:** Does the proposed area have a distinctive character and coherent identity?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	136	14	5	10
All respondents (%)	165	82	8	3	6
<b>All answering (%)</b>	155	88	9	3	-
Individuals	127	86	10	4	-
Organisations	28	96	4	0	-
- Interest organisations / Stakeholders	14	100	0	0	-
- Public sector bodies	10	90	10	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

**Component 2:** Is the proposed area of a sufficient size to warrant integrated management as a National Park?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	117	23	12	13
All respondents (%)	165	71	14	7	8
<b>All answering (%)</b>	152	77	15	8	-
Individuals	124	77	15	8	-
Organisations	28	79	14	7	-
- Interest organisations / Stakeholders	14	93	7	0	-
- Public sector bodies	10	80	10	10	-
- Built Environment / Land management	3	33	33	33	-
- Energy	1	0	100	0	-

### Criterion 3: Meeting the special needs of the area

Q5. Do you agree that 'meeting the special needs of the area' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	143	9	6	7
All respondents (%)	165	87	5	4	4
<b>All answering (%)</b>	158	91	6	4	-
Individuals	128	90	7	3	-
Organisations	30	93	0	7	-
- Interest organisations / Stakeholders	15	100	0	0	-
- Public sector bodies	10	80	0	20	-
- Built Environment / Land management	4	100	0	0	-
- Energy	1	100	0	0	-

Q6. Do you agree with the components of criterion 3 (meeting the special needs of the area)? If you disagree, please give reasons for your answer.

**Component 1:** How would National Park designation support the conservation and enhancement of cultural heritage and the historic environment?

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	135	17	3	10
All respondents (%)	165	82	10	2	6
<b>All answering (%)</b>	155	87	11	2	-
Individuals	126	85	13	2	-
Organisations	29	97	3	0	-
- Interest organisations / Stakeholders	14	100	0	0	-
- Public sector bodies	10	90	10	0	-
- Built Environment / Land management	4	100	0	0	-
- Energy	1	100	0	0	-



**Component 2:** How would National Park designation support nature recovery and restoration in the area, including ecosystem restoration, protection and recovery of vulnerable and important species and wildlife management?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	145	7	2	11
All respondents (%)	165	88	4	1	7
<b>All answering (%)</b>	154	94	5	1	-
Individuals	125	94	6	0	-
Organisations	29	93	0	7	-
- Interest organisations / Stakeholders	14	93	0	7	-
- Public sector bodies	10	90	0	10	-
- Built Environment / Land management	4	100	0	0	-
- Energy	1	100	0	0	-

**Component 3:** How would National Park designation help to promote the understanding and enjoyment of the area by Scotland's people?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	131	15	7	12
All respondents (%)	165	79	9	4	7
<b>All answering (%)</b>	153	86	10	5	-
Individuals	124	85	10	5	-
Organisations	29	90	7	3	-
- Interest organisations / Stakeholders	14	86	7	7	-
- Public sector bodies	10	90	10	0	-
- Built Environment / Land management	4	100	0	0	-
- Energy	1	100	0	0	-

**Component 4:** How would National Park designation support the sustainable development and well-being of local communities?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	141	11	3	10
All respondents (%)	165	85	7	2	6
<b>All answering (%)</b>	155	91	7	2	-
Individuals	125	90	7	2	-
Organisations	30	93	7	0	-
- Interest organisations / Stakeholders	15	93	7	0	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	4	75	25	0	-
- Energy	1	100	0	0	-

**Component 5:** How would National Park designation support the sustainable use of the area's natural resources and how it would make a significant contribution to climate change mitigation and adaptation?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	141	7	6	11
All respondents (%)	165	85	4	4	7
<b>All answering (%)</b>	154	92	5	4	-
Individuals	125	90	6	4	-
Organisations	29	97	0	3	-
- Interest organisations / Stakeholders	14	93	0	7	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	4	100	0	0	-
- Energy	1	100	0	0	-

## Criterion 4: Visitor management and experience

Q7. Do you agree that 'visitor management and experience' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	139	9	7	10
All respondents (%)	165	84	5	4	6
<b>All answering (%)</b>	<b>155</b>	<b>90</b>	<b>6</b>	<b>5</b>	<b>-</b>
Individuals	127	87	7	6	-
Organisations	28	100	0	0	-
- Interest organisations / Stakeholders	14	100	0	0	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

Q8. Do you agree with the components of criterion 4 (visitor management and experience)? If you disagree, please give reasons for your answer.

**Component 1:** How would National Park designation enhance opportunities for enjoyment, recreation and understanding of the area's natural and cultural heritage?

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	138	10	6	11
All respondents (%)	165	84	6	4	7
<b>All answering (%)</b>	<b>154</b>	<b>90</b>	<b>6</b>	<b>4</b>	<b>-</b>
Individuals	127	89	6	5	-
Organisations	27	93	7	0	-
- Interest organisations / Stakeholders	13	92	8	0	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	67	33	0	-
- Energy	1	100	0	0	-

**Component 2:** How would National Park designation support visitor management in the area?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	135	10	9	11
All respondents (%)	165	82	6	5	7
<b>All answering (%)</b>	154	88	6	6	-
Individuals	127	86	8	6	-
Organisations	27	96	0	4	-
- Interest organisations / Stakeholders	13	100	0	0	-
- Public sector bodies	10	90	0	10	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

**Component 3:** How could National Park designation support current and potential future transport infrastructure in and around the proposed area?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	132	9	13	11
All respondents (%)	165	80	5	8	7
<b>All answering (%)</b>	154	86	6	8	-
Individuals	127	86	6	8	-
Organisations	27	85	4	11	-
- Interest organisations / Stakeholders	13	85	8	8	-
- Public sector bodies	10	90	0	10	-
- Built Environment / Land management	3	67	0	33	-
- Energy	1	100	0	0	-

**Component 4:** How could National Park designation support access to nature for Scotland's people?

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	135	13	7	10
All respondents (%)	165	82	8	4	6
<b>All answering (%)</b>	155	87	8	5	-
Individuals	127	88	6	6	-
Organisations	28	82	18	0	-
- Interest organisations / Stakeholders	14	79	21	0	-
- Public sector bodies	10	90	10	0	-
- Built Environment / Land management	3	67	33	0	-
- Energy	1	100	0	0	-

## Criterion 5: Added value

Q9. Do you agree that 'added value' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	112	26	17	10
All respondents (%)	165	68	16	10	6
<b>All answering (%)</b>	<b>155</b>	<b>72</b>	<b>17</b>	<b>11</b>	<b>-</b>
Individuals	127	69	19	12	-
Organisations	28	86	7	7	-
- Interest organisations / Stakeholders	14	71	14	14	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

Q10. Do you agree with the components of criterion 5 (added value)? If you disagree, please give reasons for your answer.

**Component 1:** How would the benefits of a National Park in the area justify the investment required?

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	116	20	17	12
All respondents (%)	165	70	12	10	7
<b>All answering (%)</b>	<b>153</b>	<b>76</b>	<b>13</b>	<b>11</b>	<b>-</b>
Individuals	126	76	14	10	-
Organisations	27	74	7	19	-
- Interest organisations / Stakeholders	14	57	14	29	-
- Public sector bodies	9	89	0	11	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

**Component 2:** What is the added value that National Park designation would bring to the area?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	109	25	17	14
All respondents (%)	165	66	15	10	8
<b>All answering (%)</b>	151	72	17	11	-
Individuals	124	71	19	10	-
Organisations	27	78	7	15	-
- Interest organisations / Stakeholders	14	64	7	29	-
- Public sector bodies	9	89	11	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

## Criterion 6: Local support

Q11. Do you agree that 'local support' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	121	22	14	8
All respondents (%)	165	73	13	8	5
<b>All answering (%)</b>	157	77	14	9	-
Individuals	128	73	17	9	-
Organisations	29	93	0	7	-
- Interest organisations / Stakeholders	15	87	0	13	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

Q12. Do you agree with the components of criterion 6 (local support)? If you disagree, please give reasons for your answer.

**Component 1:** What level of local support (with evidence) is there from local interests (community bodies, landowners and managers, businesses, third sector organisations, public bodies etc).

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	115	27	15	8
All respondents (%)	165	70	16	9	5
<b>All answering (%)</b>	157	73	17	10	-
Individuals	128	69	21	10	-
Organisations	29	93	0	7	-
- Interest organisations / Stakeholders	15	87	0	13	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-



**Component 2:** What level of support (with evidence) is there from the local authority/authorities in the area?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	113	23	21	8
All respondents (%)	165	68	14	13	5
<b>All answering (%)</b>	157	72	15	13	-
Individuals	128	69	18	13	-
Organisations	29	86	0	14	-
- Interest organisations / Stakeholders	15	80	0	20	-
- Public sector bodies	10	100	0	0	-
- Built Environment / Land management	3	67	0	33	-
- Energy	1	100	0	0	-

## Criterion 7: Strategic contribution

Q13. Do you agree that 'strategic contribution' should be a criterion for assessing nominations for new National Parks? If you disagree, please give reasons for your answer.

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	142	12	2	9
All respondents (%)	165	86	7	1	5
<b>All answering (%)</b>	156	91	8	1	-
Individuals	128	91	8	1	-
Organisations	28	89	7	4	-
- Interest organisations / Stakeholders	15	87	13	0	-
- Public sector bodies	10	90	0	10	-
- Built Environment / Land management	2	100	0	0	-
- Energy	1	100	0	0	-

Q14. Do you agree with the components of criterion 7 (strategic importance)? If you disagree, please give reasons for your answer.

**Component 1:** How could National Park designation support the area's leadership on climate change mitigation and adaptation in a way that is fair and inclusive for local communities?

	n=	% Agree	% Disagree	% Don't know	% No answer
All respondents (n=)	165	134	12	8	11
All respondents (%)	165	81	7	5	7
<b>All answering (%)</b>	154	87	8	5	-
Individuals	126	88	8	4	-
Organisations	28	82	7	11	-
- Interest organisations / Stakeholders	14	93	0	7	-
- Public sector bodies	10	70	20	10	-
- Built Environment / Land management	3	67	0	33	-
- Energy	1	100	0	0	-

**Component 2:** How could National Park designation support the area's contribution to commitments within the Scottish Biodiversity Strategy, including ecosystem restoration, protection and recovery of vulnerable species, wildlife management, nature friendly farming, the expansion of areas that are protected for nature and the development of nature networks?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	134	9	9	13
All respondents (%)	165	81	5	5	8
<b>All answering (%)</b>	152	88	6	6	-
Individuals	124	89	6	5	-
Organisations	28	86	4	11	-
- Interest organisations / Stakeholders	14	93	7	0	-
- Public sector bodies	10	80	0	20	-
- Built Environment / Land management	3	67	0	33	-
- Energy	1	100	0	0	-

**Component 3:** How could designation as a National Park support sustainable investment in the area's natural capital?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	128	15	10	12
All respondents (%)	165	78	9	6	7
<b>All answering (%)</b>	153	84	10	7	-
Individuals	125	85	10	5	-
Organisations	28	79	7	14	-
- Interest organisations / Stakeholders	14	86	7	7	-
- Public sector bodies	10	70	10	20	-
- Built Environment / Land management	3	67	0	33	-
- Energy	1	100	0	0	-

**Component 4:** How could designation as a National Park support the development of green skills and jobs in the area?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	136	11	6	12
All respondents (%)	165	82	7	4	7
<b>All answering (%)</b>	153	89	7	4	-
Individuals	125	89	8	3	-
Organisations	28	89	4	7	-
- Interest organisations / Stakeholders	14	100	0	0	-
- Public sector bodies	10	70	10	20	-
- Built Environment / Land management	3	100	0	0	-
- Energy	1	100	0	0	-

**Component 5:** How could designation as a National Park complement the contribution that Scotland's existing National Parks make to tackling the nature and biodiversity crises?

	n=	% Agree	% Disagree	% Don't know	% No answer
<i>All respondents (n=)</i>	165	137	8	6	14
All respondents (%)	165	83	5	4	8
<b>All answering (%)</b>	151	91	5	4	-
Individuals	125	91	6	3	-
Organisations	26	88	4	8	-
- Interest organisations / Stakeholders	14	93	7	0	-
- Public sector bodies	9	89	0	11	-
- Built Environment / Land management	2	50	0	50	-
- Energy	1	100	0	0	-

# Criteria summary

## Criterion 1 - outstanding national importance

Is the area of outstanding national importance because of its natural heritage or the combination of its natural and cultural heritage?	Component 1 Is the proposed area of outstanding national importance due its natural heritage, including biodiversity, geodiversity and landscapes?
	Component 2 Is the proposed area of outstanding national importance due to the area's cultural heritage, including the historic environment?

## Criterion 2 - size, character and coherence

Does the area have a distinctive character and a coherent identity? Is the proposed area of a sufficient size to justify integrated management as a National Park?	Component 1 Does the proposed area have a distinctive character and coherent identity?
	Component 2 Is the proposed area of a sufficient size to warrant integrated management as a National Park?

### Criterion 3 - meeting the special needs of the area

<p>How would designating the area as a National Park meet the special needs of the area? What difference would National Park designation make to the area for nature restoration, cultural heritage, sustainable use of natural resources, public enjoyment and sustainable communities?</p>	<p>Component 1 How would National Park designation support the conservation and enhancement of cultural heritage and the historic environment?</p>
	<p>Component 2 How would National Park designation support nature recovery and restoration in the area, including ecosystem restoration, protection and recovery of vulnerable and important species and wildlife management?</p>
	<p>Component 3 How would National Park designation help to promote the understanding and enjoyment of the area by Scotland's people?</p>
	<p>Component 4 How would National Park designation support the sustainable development and well-being of local communities?</p>
	<p>Component 5 How would National Park designation support the sustainable use of the area's natural resources and how it would make a significant contribution to climate change mitigation and adaptation?</p>

#### Criterion 4 - visitor management and experience

How would designating the area as a National Park support visitor management and the area's offer for education, recreation and enjoyment by all of Scotland's people?	Component 1 How would National Park designation enhance opportunities for enjoyment, recreation and understanding of the area's natural and cultural heritage?
	Component 2 How would National Park designation support visitor management in the area?
	Component 3 How could National Park designation support current and potential future transport infrastructure in and around the proposed area?
	Component 4 How could National Park designation support access to nature for Scotland's people?

#### Criterion 5 – added value

Why is the investment required to create and operate a new National Park for this area justified?	Component 1 How would the benefits of a National Park in the area justify the investment required?
	Component 2 What is the added value that National Park designation would bring to the area?

#### Criterion 6 - local support

Is there sufficient evidence of local support for this proposal?	Component 1 What level of local support (with evidence) is there from local interests (community bodies, landowners and managers, businesses, third sector organisations, public bodies etc).
	Component 2 What level of support (with evidence) is there from the local authority/authorities in the area?

## Criterion 7 - strategic contribution

Would the designation of the area bring benefits to Scotland as a whole and contribute to strategic priorities including nature restoration, climate mitigation and adaptation action, green investment, skills and jobs and nature friendly farming?	<b>Component 1</b> How could National Park designation support the area's leadership on climate change mitigation and adaptation in a way that is fair and inclusive for local communities?
	<b>Component 2</b> How could National Park designation support the area's contribution to commitments within the Scottish Biodiversity Strategy, including ecosystem restoration, protection and recovery of vulnerable species, wildlife management, nature friendly farming, the expansion of areas that are protected for nature and the development of nature networks?
	<b>Component 3</b> How could designation as a National Park support sustainable investment in the area's natural capital?
	<b>Component 4</b> How could designation as a National Park support the development of green skills and jobs in the area?
	<b>Component 5</b> How could designation as a National Park complement the contribution that Scotland's existing National Parks make to tackling the nature and biodiversity crises?





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