A report on the proposal for a National Park in Southwest Scotland

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Scottish Government
Riaghaltas na h-Alba

NatureScot
NàdarAlba
Scotland's Nature Agency
Buidheann Nàdair na h-Alba

A report on the proposal for a National Park in Southwest Scotland

This report has been prepared by NatureScot for the Scottish Government under Section 3 of the National Parks (Scotland) Act 2000

Executive summary

In July 2024, NatureScot was requested by Scottish Ministers under Section 3 of the National Parks (Scotland) Act 2000 to undertake the reporting on its proposal for a Galloway National Park. This report presents the findings of this work and the conclusions we have reached as Reporter on the proposal. To ensure clarity between our roles, we have presented our advice as natural heritage advisor in a separate letter.

Consultation outcomes

This consultation has been one of the largest and most challenging NatureScot has undertaken. We have made every effort to raise awareness of the proposal and to provide everyone with an interest in it with opportunities to express their views. It has followed good practice in public consultation and has sought to be as inclusive, participatory and equality focused as possible in the time frame available. As well as the consultation survey itself, the range of engagement activity has included an online information hub and leaflets distributed to 52,000 addresses, as well as meetings and events with local communities, interest groups, businesses, landowners and land managers.

The key themes from the consultation in support of the National Park proposal were based around the enhanced action it would deliver to protect and restore the natural and cultural heritage of the area; the range of economic and social benefits it could bring; the stronger local voice it would provide in decision making; and the positive recognition it would bring to this part of Scotland.

In contrast, the arguments made against the proposed National Park were based on the potential negative economic impact of National Park status on the farming, forestry and renewable sectors; fears of overtourism; the impact on local infrastructure and services; and concerns over the appropriateness of a National Park solution for the area.

The principle of a National Park and alternatives to it

As Reporter, our assessment and our analysis of the issues and of the range of views expressed during the consultation suggests that the proposal has not garnered sufficient support locally to proceed.

Our recommendation as Reporter is therefore not to proceed with the designation but instead to strengthen a range of existing arrangements, including a better resourced and more influential Galloway and Southern Ayrshire Biosphere Reserve, a renewed focus on people and nature alongside commercial forestry operations in the Galloway Forest Park and a new commitment to the implementation of management strategies for the three National Scenic Areas.

The arrangements for the proposed National Park

As part of our reporting role, we were also asked to develop the detailed arrangements for the National Park for consideration by Scottish Ministers if they did decide to go ahead with preparing and consulting on a draft designation order to establish the National Park. This includes the following issues which we detail in Section 4 of the report:

- Area of the National Park
- Powers and functions of the National Park Authority

- Governance of the National Park Authority
- Name of the National Park.

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Section 1 - Introduction

1. In July 2024, Scottish Ministers made a formal proposal under Section 2 of the National Parks (Scotland) Act 2000 for a National Park in Southwest Scotland (covering Galloway and extending into South and East Ayrshire). They also asked NatureScot to act as the statutory reporter on this proposal, as required under Section 3 of the Act. We were required to consult widely on the proposal and to report in light of the responses to the consultation. This report sets out our findings.

Background

2. In 2021, the Scottish Government announced that the time was right to establish a third National Park. This builds on, in its view, the generally positive experience of the existing National Parks in Loch Lomond & the Trossachs and the Cairngorms in caring for two of Scotland's most special places. A Scottish Parliament debate in June 2022 also demonstrated cross-party support for new National Parks in Scotland and a NatureScot public opinion survey in 2022 indicated that 89% of people in Scotland supported the creation of a new National Park.

3. At that time, Scottish Government did not have a specific area in mind for Park status and instead developed a non-statutory process to seek nominations from local groups. Five areas came forward. They were appraised by an expert panel against the published criteria. Scottish Ministers agreed that the bid put forward by the Galloway National Park Association (GNPA) and the Galloway and Southern Ayrshire Biosphere Reserve (G&SABR) had met all of the appraisal criteria.

4. The bid for a Galloway National Park built on previous work by the GNPA and had been subject to extended discussion locally over many years as well as specific consideration within the local development plan for Dumfries and Galloway. In its report on the support it provided to the bidding groups during 2022/23 on behalf of the Scottish Government, Lateral North noted the following:

> Out of all of the areas that [we] facilitated engagement work….. Galloway was clearly the least divided with the conversation much more focused around exploring ideas and opportunities rather than asking questions about what a national park is or the process. This will without a shadow of a doubt be because the GNPA have been promoting their campaign for over 7 years now within the local area so a lot more people are aware of what a national park is and what the process is as well.
>
> The engagement sessions were a mix of people of different backgrounds - farmers and landowners through to dog walkers and artists - which were reflected in their varied comments. The four engagement sessions took place in four very different communities, however there was an overall sense within each of those that the creation of a national park within the area is something that a majority of the community want to see happen.

5. While not everyone was in favour of Park status for area (as the bid itself made clear), the bid was supported in principle by all three local authorities and the South of Scotland Enterprise (SOSE).

6. On the basis of its appraisal, Scottish Ministers initiated the first stage of the statutory process for designating the National Park, appointing NatureScot as the reporter and providing guidance to us about how we should undertake this task.

7. Scottish Ministers will consider NatureScot's report, including the findings of the public consultation, and consider whether or not they wish to designate the area as Scotland's third National Park. If they decide to do so, the next step set out in the legislation would be the preparation of a designation order which provides for the National Park to be legally established by the Scottish Parliament. The designation order would first be subject to a further period of public consultation before it is finalised and submitted to the Scottish Parliament for further scrutiny before approval or rejection.

8. Despite an earlier commitment to designate a National Park in this Parliamentary term, **no decision to establish a National Park has yet been made with Ministers making clear that they want to use the formal proposal to gauge the level of support locally and nationally for a National Park in the Galloway area and alternatives to it.** If having considered NatureScot's advice as Reporter they agree to proceed with the designation process, Ministers will consider the most appropriate timetable for it.

9. Alternatively, Ministers may decide to withdraw the proposal or undertake further work on it. Under Section 5 of the National Parks (Scotland) 2000 Act, Scottish Ministers also have the power to hold a formal public inquiry to allow examination of those issues which require more detailed scrutiny.

Issues for the Reporter to address

10. As the Reporter, NatureScot was asked to gauge the level of support or opposition to the proposal and alternatives to it. At the same time, we were required to develop the detail of the proposed National Park and seek the views of local people and other stakeholders on it. The starting point for the Reporter investigation into these matters was the bid submitted jointly by the GNPA and G&SABR together with the relevant findings within the Scottish Government's appraisal panel report.

11. As set out in the reporter requirements under Section 3 of the National Parks (Scotland) Act 2000, Scottish Ministers asked NatureScot to consider and advise them on the following specific matters:
    a) the area which it is proposed should be designated as a National Park;
    b) the desirability of designating the area in question (with or without modifications) as a National Park;
    c) an assessment of whether the conditions in section 2(2) of the 2000 Act are satisfied in relation to the area that has been proposed as a National Park;

d) the functions which it is proposed the National Park authority for the Park should exercise;
e) the proposed governance arrangements for the National Park authority including: the proposed size of the authority; the proposed number of elected members; the proposed number of members appointed by Ministers (including those to be nominated by the local authority/local authorities in the area); the proposed date of election to the board; and any particular expertise, knowledge and skillset that should be represented on the board;
f) consider options for a new National Park authority in Galloway to be cost efficient, contribute to Scotland's public sector reform agenda and provide value for money for Scotland as a whole;
g) recommend the development of any transitional arrangements in the area prior to designation as a National Park; and,
h) the proposed name of the National Park.

12. In our advice to Ministers, we were asked to report on the engagement and consultation we undertook and how we analysed the views provided including:
    a) reporting on who the major stakeholders and interest groups are and how they have been engaged and consulted;
    b) providing an analysis of the balance of opinion on the matters considered, including specific reference to the views expressed by local communities and businesses (including those representing agriculture and forestry interests) and by bodies and agencies representative of interests which fall outside our remit; and,
    c) ensuring that any views which are those of NatureScot as statutory adviser on natural heritage matters are kept clear and distinct.

13. In accordance with these requirements, this report distinguishes where necessary three separate elements:
    i. The range of views expressed by consultees and, where possible, the reasoning behind those views
    ii. Discussion and analysis of significant points, the evidence underpinning them and their relevance to the proposal
    iii. NatureScot's advice as Reporter.

14. The views and conclusions set out in this report are based on the analysis of the responses to the consultation. The engagement and consultation work undertaken demonstrated considerable polarisation of views on the proposal. From some quarters there was also distrust in the decision makers and NatureScot's ability to act as Reporter given our general position of support for new National Parks where these are supported locally. Given these circumstances, we have carefully described the range of views expressed to us and by whom. We have also explained our line of reasoning which we have used to come to our conclusions so that Scottish Ministers can decide on the way forward.

The role of the Reporter

15. Our role as Reporter is separate to our role as natural heritage advisor. As Reporter, we are asked to consider the proposal in terms of the National Park (Scotland) Act 2000 which includes the natural heritage aspects of a National Park, but also a range of other environmental, social, economic and administrative factors. We are also asked to come to a view both in light of our analysis of the consultation we were required to undertake and also the expertise we have as an organisation. In contrast, as natural heritage advisor we are required to focus on core aspects of our remit only. To ensure clarity between our roles, we have therefore presented our advice as natural heritage advisor in a separate letter.

Structure of the report

16. The report deals with the various issues on which NatureScot was asked to report as follows:

Section 2 - The engagement and consultation process
Section 3 - The principle of a National Park in Southwest Scotland
Section 4 - The arrangements for the proposed National Park if Ministers decide to proceed with designation:

- Area
- Powers and functions
- Governance and staffing
- Name
- Other issues

Annex A	Requirement for NatureScot to act as the reporter
Annex B	List of accompanying reports
Annex C	Breakdown of responses from business and organisations
Annex D	A selection of quotes from the surveys from individuals, businesses and organisations
Annex E	Assessing and selecting the area of the proposed National Park

17. The reports accompanying this advice provide additional detailed information on our approach to the consultation and its analysis, and the results of the detailed analysis of the responses to the separate consultation surveys; the programme of public events and surgeries organised and facilitated by the consultancy Outside the Box (OtB); correspondence; and bespoke engagement with young people. NatureScot also commissioned an independent review of the engagement and consultation process by the Scottish Community Development Centre (SCDC).

Distribution of this report

18. This advice and its supporting reports are all available online. Where respondents have given permission for this, the data from the responses to the surveys are also available on request. We have circulated a summary of the advice to community councils and organisations, local authorities, public bodies and other groups who contributed to the consultation process.

19. Anyone who has questions about any aspect of the report and the process of engagement and consultation which underpinned it should contact NatureScot at NationalParkReporter@nature.scot.

Section 2 - The engagement and consultation process

20. Before we could prepare this reporter advice, NatureScot was required to consult widely with individuals and organisations with an interest in the proposed National Park. This section of our advice describes how we undertook this task, summarises the comments received about how we did this and presents an assessment of its effectiveness, drawing on the independent review of this work we commissioned from the Scottish Community Development Centre (SCDC).

Overall approach

21. The overall approach was set out in the Reporter Plan published in August 2024 outlining three phases of work:

Table 1 – Phases of work

Pre-consultation Engagement (August 2024 – mid October 2024) To raise awareness of the proposal and work with local interests and other stakeholders to design an effective consultation strategy and develop the draft proposals for consultation **Formal Consultation (November 2024 – February 2025)** To gauge opinion on detailed proposals and the support or opposition to the principle of the proposal through a formal 12-week consultation. **Analysis and Evidence (February 2025 – April 2025)** To analyse the responses received and finalise advice for Ministers taking account of the views expressed in the previous phases

22. As well as being developed to ensure we meet the requirements on us, our work was informed by Scottish Government good practice on consultations and the national standards of community engagement. Alongside this Reporter Plan we also developed an Equalities Impact Assessment to consider how to develop our work to be as inclusive as possible.

Pre-consultation Engagement

23. In the engagement phase we:

- wrote and provided briefing on the proposal and how we proposed to undertake the consultation process on it to the three local authorities, 52 community councils and 39 community organisations across the indicative area suggested by the bid;
- provided a range of information, such as details of the process and frequently asked questions, on the National Parks pages of our website;
- prepared and distributed through the post an information leaflet to 52,000 households and businesses within and close to the indicative area suggested in the

bid (though we recognise that not all addresses have received them as we had anticipated);
- created a dedicated online Reporter hub to provide information and the opportunity for interested parties to share issues and concerns. In total, more than one thousand respondents contributed a total of 2,951 comments to the various surveys hosted on the information hub;
- held or inputted to over 30 meetings online and in person with circa 400 people from local and national groups and stakeholders to explain the process and discuss the issues it raises;
- scoped and developed bespoke engagement with young people and under-represented people and groups;
- issued press releases and social media content to raise the profile of the work and respond to widely held queries;
- responded to over 500 emails and letters; and
- developed more detailed thinking on the proposal to inform the formal consultation, both drawing on these discussions and our own field work and analysis.

24. We published a report summarising the main outputs from this engagement phase in December 2024. This concluded that nine of the proposed actions outlined above had been successfully completed or progressed. The report noted the significant engagement achieved overall in terms of the depth and range of issues raised for this stage of the reporting work. It also highlighted some issues encountered around engagement with community councils, the distribution of the information leaflet by Royal Mail and the postponing of the drop-in surgeries to enable these to be informed by the more specific proposals in the consultation.

Formal Consultation

25. For the consultation phase we developed a main consultation paper and used this as the basis for the following consultation methods:

    a) An online technical survey allowing participants to respond in detail to all aspects of the proposal (hereafter 'Technical survey')
    b) An online summary survey primarily intended for individuals and households (hereafter 'Summary survey')
    c) A survey leaflet distributed to the 52,000 household and business addresses in or close to the area and containing the same questions as the summary survey (hereafter 'Household survey')
    d) A programme of 30 independently facilitated public consultation events led by Outside the Box held across the area
    e) Sector-led consultation meetings and events including land managers, tourism, renewables, conservation and local authorities
    f) A range of bespoke engagement work with young people, black and ethnic minorities, disability groups, and other under-represented groups.

26. We received 5,387 responses to the three surveys, of which 5,230 were considered valid. A more detailed breakdown of the responses by businesses and organisations is provided in Annex C.

Table 2 - Survey Reponses

Survey Type	Total valid responses	Total invalid responses[1]
Summary	4,477	120
Technical	445	4
Household	308	33
Sub-totals	5,230	157
TOTAL	-	5,387

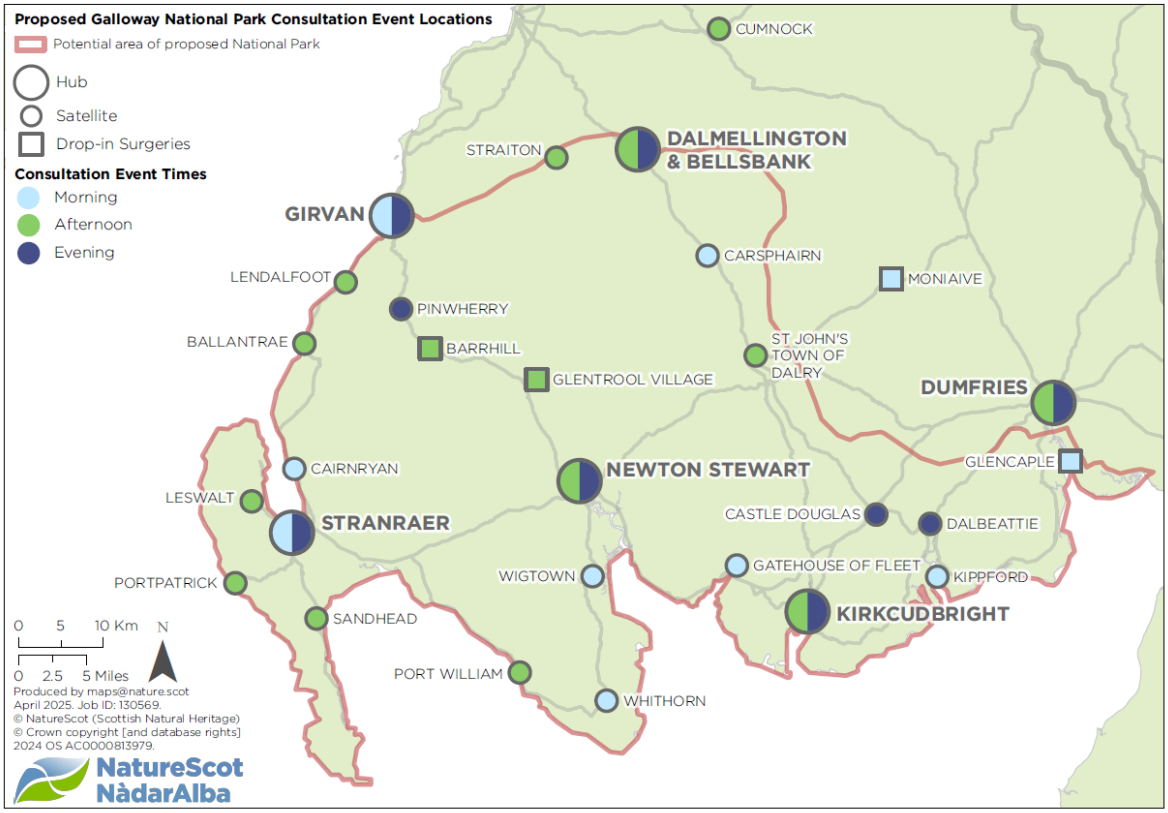
27. Between November 2024 and February 2025, the consultancy, Outside the Box, facilitated and hosted 30 community events across Southwest Scotland and three online events. In total 1,158 people signed in and participated in the activities. A number of additional people also attended these events but did not sign in. In addition, 4 drop-in surgeries organised and led by NatureScot attracted over 60 attendees.

28. During the consultation period, we also attended a series of 8 sector-led meetings with audiences ranging approximately from 5 to 50. We also provided briefing for councillors of the three local authorities and met regularly with the South of Scotland team of public sector bodies.

29. Map 1 shows the location and timing of all the public consultation events and drop-in meetings held as part of the consultation.

[1] Invalid responses included those that did not include basic respondent information, inappropriate duplicates, or test submissions. The validation process is detailed in the Methodology Report we are publishing alongside this advice.

Map 1 - Consultation event locations



Analysis and Advice

30. In the advice phase we analysed all survey responses and information from the public meetings to develop the consultation reports that accompany this advice. Support in handling and analysing data from the three surveys was provided by the consultancy Progressive Partnership. The detailed methodology for this analysis is presented as a separate report.

31. Using this analysis, a small team developed the draft advice for discussion and review by a range of senior staff. The NatureScot Board discussed the advice at extraordinary online meetings held on 17 and 28 April and 2 May 2025. In preparation for this work, on 15 and 16 March 2025, the NatureScot Board also visited the proposal area to familiarise themselves with it and to meet and hear from a range of stakeholders who had participated in the consultation.

Commentary on the consultation

32. We consider that we have successfully delivered on all the outputs and milestones we set out to undertake in the Reporter Plan to meet the requirements of us from Scottish Government. We also received a range of formal and informal feedback on the work we have undertaken, most of it positive. Though we do not ask a direct question on this issue, calls for a referendum were mooted in responses to the consultation making up less than 3% of all responses.

33. At the same time, we recognise that a number of issues have been raised by members of the public and by groups who were opposed to the proposal, with the No Galloway Campaign Group in particular expressing significant concerns about both our capacity and capability to act as Reporter. Throughout the process, we have sought to address the key concerns raised by making changes to the programme of work. We also responded to 321 separate emails from 155 people (of which 30 people sent 173 emails and 3 people sent 50 emails) seeking further information on the process or challenging aspects of it.

34. A common theme raised concerned the survey approach which sought to gauge opinion on the proposal and alternatives to it while also seeking views on the detailed arrangements for the proposed National Park. While these elements of the analysis are presented separately in this report, we do know that responses to many of the questions was lower among strong opponents of the proposed National Park and that some people were concerned that offering a preference on an option area might be interpreted as support for the National Park itself.

35. We also heard claims that the consultation process was not fair and balanced in line with the national standards for community engagement. Equally, concerns were raised from both sides of the debate that the heated nature of the public and online discourse on the proposal was making it difficult for all to have their voices heard. In response, NatureScot and SOSE had to issue statements seeking to lower the temperature of the discourse and focus it on the substantive issues rather than personal ones.

36. In their report on the programme of public consultation events they organised and facilitated which will be published alongside this report, Outside the Box noted several lessons learned as well as improvements that could be made in further engagement exercises. Most of these result from the time and timing to prepare and run the events suggesting a longer run of more than 8 weeks to the consultation exercise may have been useful. They also provided the following feedback and commentary on the process.

Feedback from People at the Community Events

At the events, informal feedback was gathered at the welcome desk from people as they left the events. Feedback tended to fit into four areas. People said:

- it was useful and informative, and they felt they had a chance to have their say, leave comments and talk with NatureScot staff;
- the information was too vague, and the proposal was unclear making it hard to comment;
- the information boards were too wordy with too much to read and take in; and,
- they didn't like the dots and post-it notes approach because they felt they were being treated like children.

Most people said the events were useful. Outside the Box observation of people at the events was that many arrived looking tense and uncertain and left looking more relaxed after they had completed activities and had conversations with NatureScot and Outside the Box staff.

People also said they liked meeting and seeing their neighbours and friends and spending time chatting about the issues in an informal setting. At most of the events there was a friendly relaxed atmosphere and people stayed for an hour or so chatting with neighbours and friends.

37. While this feedback was generally positive, Outside the Box also made the following observations on the atmosphere of the events.

Atmosphere at the Community Events

The aim of the community drop-in events was that they were a safe enjoyable space and experience where people could easily share their views, participate in activities and get answers to their questions.

However, during at least five events, participants and *Outside the Box* staff experienced aggressive and intimidating behaviour by other people at the events.

At four events the venue was at capacity for the numbers of people who arrived and then stayed watching what was happening and what comments were being left. The lack of space and noise of many people talking added to the unpleasant atmosphere.

At other events, 'no-campaign' banners were installed outside the venue during the drop-in event, 'no-campaign' leaflets were handed out to people outside the venue before they came in (and inside at least two venues as well) and members of the 'no-campaign' wore clothing, fleeces and buffs, featuring 'no-campaign' logos.

At the end of every event people supporting the 'no-campaign' took photos of the completed feedback boards and in particular the completed H diagram board.

Outside the Box staff observed that people who were undecided or were positive towards the proposed Park were less likely to complete activities and write comments, and when they did complete activities would wait until a quiet time to do so.

38. In their broader review of our consultation work against the National Standards For Community Engagement which will be published alongside this advice, the Scottish Community Development Centre (SCDC), interviewed a wide cross section of people who participated in the consultation. Overall, they noted that "this consultation compares very favourably with others and has demonstrated elements of very good practice in the use of the National Standards in Scotland". Key conclusions from the final report included the following.

Levels of involvement: NatureScot have made very significant progress in involving local people in the decision making about designation which compares very favourably with other park designations and large-scale public consultations. We should say that reliable figures for levels of engagement in public policy are not routinely gathered, analysed and published however comparisons we did identity point to significantly lower rates of involvement in these consultations.

Making use of the Standards: Our dialogue with those planning and delivering the work confirms that the design of the engagement used a systematic approach guided by the National Standards for Community Engagement in terms of who needed to be engaged, the contact strategy, methods and how to reach population groups whose voices are often not heard.

Methods used: We feel that the methods used were fundamentally sound and it is clear that the NatureScot Reporter Team sought to maximise opportunities to enable people to participate, particularly geographically, but also in communities of identity. In our experience the numbers of people who did take part was much higher than other activity we have supported or observed in other areas, and we imagine the analysis of engagement data will confirm this. The spread of promotional work, numbers of well attended local meetings and the work to raise awareness of the survey were evidence of this.

Role of NatureScot: Despite some local views to the contrary, we think it is clear that as a government agency operating on environmental issues that Nature Scot are a perfectly acceptable choice for government to appoint to the role of Reporter in a similar way that the Agriculture and Rural Economy Directorate regularly runs consultations on relevant policy, or that Councils and the NHS consult local people about funding priorities and service planning. This is a legitimate role of Government agencies and has value for money implications when compared to some suggestions about possible roles of independent enquiries

39. Like the Outside the Box observations on the atmosphere at some of the public consultation meetings, SCDC also noted:

Our experience suggests that it can be difficult for people to separate how they feel about the substantive issues in engagement from their feelings about the process by which their views have been sought gathered and analysed. This is particularly the case in issues where there are directly opposing views being expressed vociferously on different sides of an argument and/or where people are very motivated to advocate for specific positions and see little room for compromise. It seems clear that this has been an issue in this case with significant and effectively expressed criticisms of the process obscuring positive aspects of the work to engage local people and gather their views…

40. In its report, SCDC identified several areas for improvement and related recommendations for future engagement, with the key ones including the use of the National Standards for Community Engagement (NSfCE) planning tool VOICE; greater consistency in data gathering and use of both more inclusive and deliberative methods of engagement; and the establishment of a wider local advisory group. **These improvements and the others they suggested should be implemented during any future engagement and consultation work on this proposal with the timetable planned accordingly.**

41. Building on what we have done during the reporting work, **further efforts should also be made to engage young people and individuals with protected characteristics while work is also needed explore how best to involve people on low incomes in these discussions**. Investment in these engagement strategies will be important whatever happens next, but it would also help lay the foundations for a future National Park if Ministers decided to proceed with designation.

Consultation outcomes

42. This consultation has been the largest and most challenging one NatureScot has undertaken. We have made every effort to raise awareness of the proposal and to provide everyone with an interest in it with opportunities to express their views. It has also followed good practice in public consultation and has sought to be as inclusive, participatory and equality focused as possible in the time frame available. Public consultation and engagement has included meetings and events with local communities, interest groups, businesses and landowners and managers, using a variety of formats and approaches.

43. At times the debate has become heated, with strong and emotive language used especially online but also at some public meetings and events. Both misunderstandings and misinformation have also been evident, while attendance at public meetings and the use of negative posters and leaflets containing misleading information may also have shaped the public discourse and put off some from making their voices heard. From this perspective, the differences in the balance of opinion between the surveys and the public meetings is instructive.

44. We are aware the consultation work has been criticised by some parties as inadequate. NatureScot's ability to act as Reporter has also been called into question. The open process of developing the detail of a National Park set out in the National Park legislation has been frustrating to those wanting more detail of how a National Park would operate and what its priorities would be. These views may have been unavoidable given the legislative process requires a stepwise development of proposals, and any organisation acting as Reporter may have been perceived as taking forward a formal Government commitment.

45. Overall, we consider that our work has met the Reporter requirements set us by Scottish Ministers. There are clearly important lessons to learn from the consultation process we have undertaken and the polarisation of the debate that has happened since the

proposal was published. Nevertheless, we do not think the issues raised have significantly impacted on the outcomes of the consultation in terms of the arguments made for and against the proposed National Park, nor the conclusions we can reach from them.

Section 3 - The principle of a National Park in Southwest Scotland

46. This section of the advice considers the support and opposition for and against the proposed National Park. While it presents the overall response figures from the consultation, its main purpose is to provide an assessment of the underlying arguments made to support these positions and the case made for alternatives.

The case for a proposed Galloway National Park

47. Scotland's existing National Parks are two of the nation's most special places where nature is thriving and enjoyed by many; where sustainable use and enjoyment of the area are at the heart of community wellbeing and prosperity; and where some of the urgent action needed to tackle climate change is realised on the ground. As the Scottish Government's policy memorandum to the Natural Environment Bill notes: "Scotland's National Parks are more important now than ever before. Scotland, in common with the rest of the UK, has experienced a continuing decline in biodiversity over the last 20 years and tackling the climate and nature crises is a national priority".

48. Like other National Park areas across the UK, the hills and coasts of Galloway and Ayrshire are a living and working landscape whose valued natural and cultural heritage has been shaped by people over many centuries. More uniquely (though not exclusively), it is also an area of significant economic importance for its farming, commercial timber and renewable energy production and it is also rightly recognised as the 'dairy capital' of Scotland. All these sectors are an important component of local employment and community life, but they are also of national significance in terms of tackling climate change, moving to a more sustainable circular economy and increasing food security. Despite this important economic base, parts of the area are performing less well than other rural areas in Scotland, with lower average wages, an ageing population and pockets of high child poverty. Average occupancy rates for visitor accommodation are low and the tourism season is also shorter than elsewhere.

49. The strategies and plans of the South of Scotland Regional Economic Partnership already place high value on the importance of the area's natural capital in tackling these issues, as signalled by the development of the natural capital innovation zone for Southern Scotland. The new responsible tourism strategy 2024-34 also seeks to grow the visitor economy sustainably by inspiring more visitors to come to the south of Scotland in ways which do not undermine the special qualities of the area or the infrastructure and services that communities depend on. While focusing on community development needs, similar aspirations are picked up in many of the local place plans which are being developed by local communities across the area.

50. The establishment and expansion of the Galloway and Southern Ayrshire UNESCO Biosphere Reserve indicates the desire from South of Scotland Enterprise (SOSE) and the three local authorities across the area to find solutions to these challenges by focusing on action that protects the core of this area and seeks more sustainable approaches in its buffer and transition zones. The management plans previously drawn up for the three coastal National Scenic Areas of Fleet Valley, East Stewartry Coast and the Nith Estuary also had similar aspirations. The area is also unique in terms of the scale of public land managed by Forestry and Land Scotland (FLS), and to a much lesser extent NatureScot, on behalf of the Scottish Government. This brings significant opportunities for landscape scale approaches to nature recovery and sustainable land management.

51. As the recent consultation on the new regional land-use framework highlighted, there are tensions and potential conflicts between these land uses and the natural and cultural heritage of the area. Such issues are set to rise with the increasing trend towards afforestation of its upland areas, the future pipeline of wind farm developments and related grid infrastructure projects being considered for parts of the area, the growing intensification of lowland farming and pressures for tourism particularly on the coast.

52. The joint bid prepared by the GNPA and GSA Biosphere Reserve suggested that a National Park bespoke to Galloway could help address these challenges and meet the special needs of the area by:

- **Driving innovation and partnership:** a new style Galloway National Park will address our area's competing demands for conservation, communities and commerce with creativity, cohesion and respect. Its location in the national Natural Capital Innovation Zone places the Park in a leadership position to address biodiversity loss and climate change at a scale that will attract responsible private investment. It will:
- **Delivering landscape scale change in response to biodiversity goals and climate change targets:** Galloway has small-scale land ownership with few large estates. Producing change at scale requires the Park to bring individual landowners and managers together to enhance and expand existing nature networks. The Park will provide an opportunity for strategic spatial planning across 3 local authority areas that is essential if we are to address the rapid rate of land use change.
- **Providing a testbed for innovative nature-based solutions**: The Park contains landscape types and land uses which differ from existing NPs in terms of scale and diversity. This mosaic creates unique opportunities for solutions to be trialled and for knowledge transfer to other rural communities as exemplars of good practice. Building on the experience of the UNESCO Biosphere, and relationships with secondary and tertiary educational facilities across Scotland, robust partnerships are already in place. This Park would hit the ground running.
- **Supporting the Wellbeing Economy:** Despite decades of economic investment in agriculture, forestry and renewable energy Dumfries and Galloway has stubbornly languished at the bottom of the income league for Scotland, unlike other rural areas. Our innovative Park will focus on the regeneration of communities, economy and the environment, building on existing initiatives developed by the Biosphere and others.

53. The Scottish Government expert panel that appraised the Galloway bid also recognised many of these issues and opportunities, noting in particular:
    a) the high natural and cultural heritage value of the area;
    b) the important socio-economic context – an area doing less well than other rural parts of Scotland;
    c) an opportunity for nature recovery, to grow sustainable tourism and for greater co-ordination of existing land-uses in keeping with the regional economic strategies for the area, the borderland inclusive growth deal, and natural capital innovation zone; and,
    d) a clear contrast to existing Scottish National Parks (hill, lowland and coastal character, SW location) which provides opportunities for further demonstration and exemplars.

54. In making its proposal for a National Park in Galloway, the Scottish Government recognised that the area met - or was likely to meet subject to the detail of the area selected - the legislative conditions for National Park status. They also expected a new National Park in Galloway to actively contribute to its key priorities of growing the economy, tackling the climate emergency and improving public services. Alongside a step change in the care and enhancement of the natural and cultural heritage of the area, a new National Park would need to help deliver economic growth by supporting the visitor economy and working closely with the highly important land uses of the area. Perhaps most critically, its design and operation would need to take account of local circumstances and the views of local communities and have a positive impact on people's social, mental and physical health and wellbeing.

55. Against this background, the consultation sought to gauge the level of support for, or opposition to, a National Park and also to understand the arguments that underpinned these positions.

Level of support for or opposition to the National Park

56. The following tables and map provide an overview of the level of support for or opposition to the National Park recorded in written responses to the consultation and the public consultation events (see paragraph 25 for explanation of the detailed survey formats).

Table 3 – Breakdown of responses across the three surveys

Capacity of Response	Summary Survey		Paper Survey		Technical Survey		Overall	
As an individual	3200	71%	186	60%	264	59%	3650	70%
As a household	937	21%	98	32%	57	13%	1092	21%
As a business	296	7%	20	6%	85	19%	400	8%
As an organisation or group	37	1%	-	0%	39	9%	76	1%
Blank	8	0%	4	1%	-	0%	12	0%
Total	4477	100%	308	100%	445	100%	5230	100%

Table 4 - Breakdown of the results by survey type

Survey Type	Strongly support		Tend to support		Tend to oppose		Strongly oppose		Undecided		Blank	
Paper	78	25%	41	13%	21	7%	159	52%	4	1%	5	2%
Summary	1484	33%	457	10%	263	6%	2116	47%	143	3%	14	0%
Technical	119	27%	50	11%	22	5%	229	51%	20	4%	5	1%
Overall	1681	32%	548	10%	306	6%	2504	48%	167	3%	24	0%

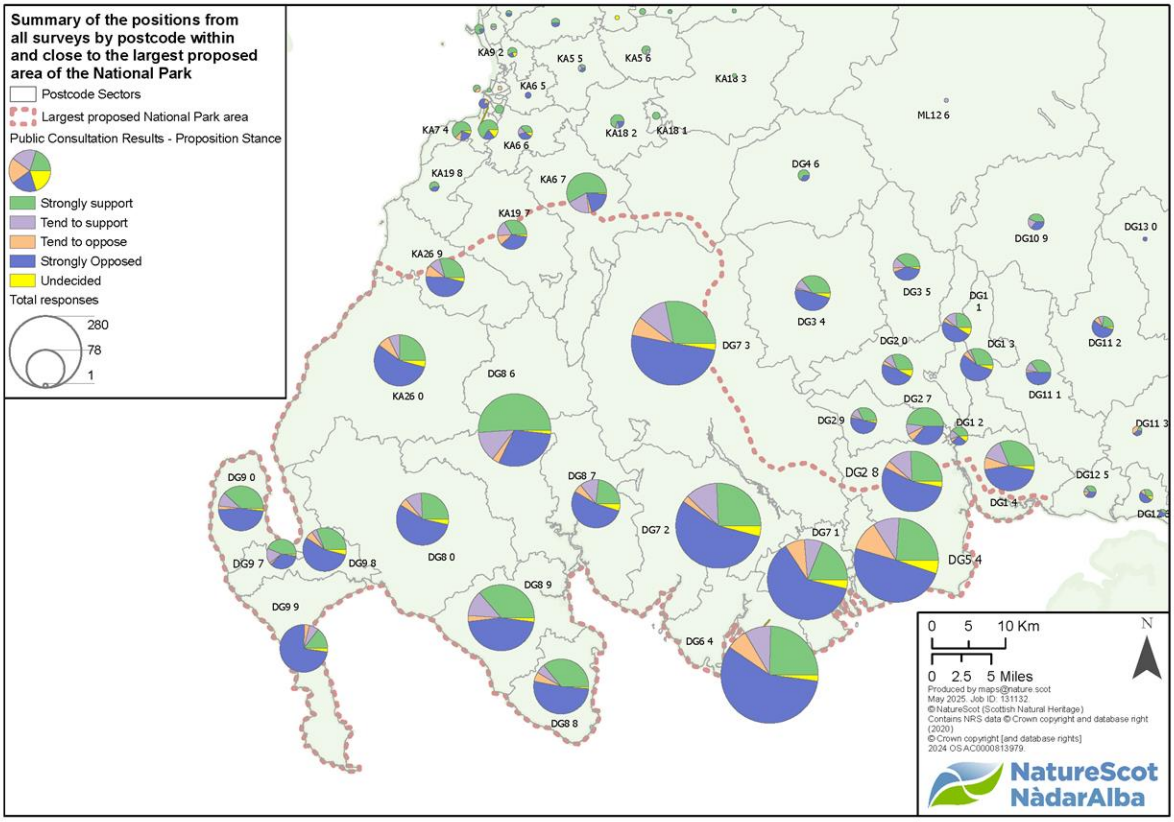
Table 5 - Breakdown of business responses

Stance	Summary		Paper		Technical		Overall	
Support	102	35%	4	20%	25	28%	131	32%
Oppose	179	61%	15	75%	55	64%	249	62%
Undecided	13	4%	-	0%	6	7%	19	5%
Blank	1	0%	1	5%	1	1%	3	1%
Total	295	-	20	-	87	-	402	-

Table 6 - Breakdown of stated positions by respondent groups (note - multiple responses possible)

Relationship to area	No. of responses	% of total	Strongly Opposed	Tend to oppose	Undecided	Tend to support	Strongly support	Blank
Live in proposal area	4028	77.0%	51.4%	5.6%	2.9%	10.2%	29.6%	0.3%
Work in proposal area	1904	36.4%	54.8%	4.6%	3.1%	10.1%	27.1%	0.4%
Farmer or forester, or work in these sectors	672	12.8%	76.3%	5.8%	2.8%	4.6%	10.2%	0.3%
Landowner / land manager	747	14.3%	65.5%	4.7%	2.9%	7.3%	18.9%	0.7%
Local councillor / other elected representative	90	1.7%	39.6%	5.5%	5.5%	11.0%	38.5%	0.0%
Business owner	940	18.0%	55.9%	3.2%	3.7%	8.1%	28.7%	0.5%
Retired	1748	33.4%	46.0%	7.0%	3.6%	11.2%	32.0%	0.1%
Student / in full-time education	159	3.0%	38.7%	12.3%	9.2%	10.4%	28.2%	1.2%
Frequent visitor to area	746	14.3%	37.4%	5.9%	2.3%	10.0%	44.3%	0.3%

Map 2 - Summary of the positions from all surveys by postcode within and close to the largest proposed area of the National Park



57. In terms of the public consultation events, the key headlines as reported by Outside the Box were as follows:

- The people attending the consultation events like living in the area and in Southwest Scotland and this included families that had lived there for generations and people who had chosen to live there.
- Everyone agrees the area needs improved infrastructure and services – especially roads and health services, economic regeneration, business investment, better employment opportunities for young people, affordable housing and environmental conservation.
- Comments in favour of a National Park embrace it as a way to bring what is needed to the area, and the concerns are that without it, the area will continue to decline.
- Comments not in favour of a National Park say that it will not only fail to deliver the positive changes people want to see but will negatively impact the local community, economy and environment for current and future generations.
- People want more information on how a National Park would run in reality and what it would mean for the area in terms of the issues noted above (infrastructure, employment, etc.)
- They want to be kept informed and for local people and communities to be involved in decision-making so that decisions are made with them, not for them.

58. Table 7 below provides an overview of the results provided by Outside the Box in percentages from the H-diagram exercise from the programme of consultation meetings. Given the methodology used, the public nature of this exercise, and the role it was specifically designed to play in helping people attending these meetings with strong opinions to express their views, care is needed interpreting these results. We would also note that of the 1,158 people who registered at these events, 329 or nearly 30% of people did not contribute to this exercise.

Table 7 - How do you feel about the proposals for a Galloway National Park? Summary of the results of the "H-diagram" exercise from the programme of consultation meetings.

<table>
<tr><td colspan="12">All meetings summary</td></tr>
<tr><td colspan="3">% very negative</td><td></td><td></td><td>Neutral</td><td></td><td></td><td colspan="3">% very positive</td><td rowspan="2">Did not take part</td></tr>
<tr><td>0</td><td>1</td><td>2</td><td>3</td><td>4</td><td>5</td><td>6</td><td>7</td><td>8</td><td>9</td><td>10</td></tr>
<tr><td>38</td><td>3</td><td>1</td><td>2</td><td>1</td><td>5</td><td>1</td><td>3</td><td>4</td><td>3</td><td>10</td><td>28</td></tr>
<tr><td colspan="12">Meeting specific summary[2]</td></tr>
<tr><td colspan="4">Opposed (0-4 scoring)</td><td>Neutral</td><td colspan="5">Supportive (6-10 scoring)</td><td>No results</td></tr>
<tr><td colspan="4">Dalry *
Carsphairn*
Girvan Hub*
Lendalfoot
Pinwherry
Sandhead
Portpatrick*
Stranraer 2*
Ballantrae*
Dumfries 1
Castle Douglas*
Dalbeattie*
Kirkcudbright 1+2*
Kipford*
Gatehouse of Fleet*
Whithorn
Port William
Newton Stewart 1</td><td>Stranraer
Leswalt</td><td colspan="5">Cumnock
Straiton
Bellsbank*
Dalmellington
Girvan CG
Dumfries 2
Wigtown
Newton Stewart 2</td><td>Cairnryan</td></tr>
</table>

[2] Meetings where more than 30% of people did not contribute to the exercise are marked with an asterisk.

59. Figure 1 below provides a summary of some of the key stakeholder positions. Two other Community Councils responded with results from community surveys but no organisational position.

Figure 1 - Summary of positions from key stakeholder organisations

<table>
<tr><td>Strongly oppose</td><td>Undecided</td><td>Strongly Support</td></tr>
<tr><td>• CONFOR (Confederation of Forest Industries)
• Corsock & Kirkpatrick CC
• Gatehouse of Fleet CC
• NFUS (National Farmers Union Scotland)
• No Galloway National Park Campaign
• Scottish Renewables
• Scottish Land & Estates</td><td>• Cycling UK
• Dumfries and Galloway Council
• Galloway Static Gear Fisherman’s Association
• Southwest Scotland Transport Alliance</td><td>• Association for the Protection of Rural Scotland
• Belmont & Kincaidston CC
• Blue Marine
• Galloway National Park Association
• GSA Biosphere Reserve
• John Muir Trust
• Landscape Institute
• Loch Doon Association
• National Trust for Scotland
• RSPB (Royal Society for the Protection of Birds)
• Scottish Campaign for National Parks
• South Ayrshire Council
• Visit Scotland</td></tr>
<tr><td>Tend to oppose</td><td>No position</td><td>Tend to support</td></tr>
<tr><td rowspan="2"></td><td>• Crown Estate Scotland
• MOD (UK Defence Estates)
• NHS Ayrshire and Arran
• NHS Dumfries and Galloway
• Regenerative Farming Network
• South of Scotland Destination Alliance</td><td rowspan="2">• Ayrshire Fisheries Trust
• Cree Valley CC
• Dumfriesshire & Galloway Natural History and Antiquarian Society
• East Ayrshire Council
• Forest Policy Group
• Galloway Conservation Society
• Galloway Fisheries Trust
• Galloway Wildlife Conservation Trust
• Historic Environment Scotland
• James Hutton Institute
• Network Rail
• Ramblers Scotland
• Scottish Countryside Rangers Association
• Scottish Wildlife Trust
• Scotways
• Southern Upland Partnership
• Wildfowl and Wildlife Trust</td></tr>
<tr><td>Support alternative</td></tr>
<tr><td></td><td>• South of Scotland Enterprise</td><td></td></tr>
</table>

While we did receive a number of national and UK responses to the consultation, 94% of all responses were from within the area or within 30km of it. An understanding of where public opinion is on this issue nationally is found in the following 2024 results of the NatureScot Omnibus Survey (NatureScot, forthcoming):

- NET support for a new national park being established in Scotland: 86%, 4% opposed (89% and 3% in 2022);
- NET support for a new national park in the Southwest of Scotland: 83% (new question);
- 39% of people said they had heard of the current proposal for a new national park in southwest Scotland (new question); and
- 50% said they had visited at least one national park for leisure in the last 12 months, whereas only 21% said they had visited the Galloway area (new question).

Meeting the conditions of the Act

60. Any area proposed for National Park status is required to meet the conditions of the Act, namely:
    a) that the area is of outstanding national importance because of its natural heritage or the combination of its natural and cultural heritage,
    b) that the area has a distinctive character and a coherent identity, and
    c) that designating the area as a National Park would meet the special needs of the area and would be the best means of ensuring that the National Park aims are collectively achieved in relation to the area in a co-ordinated way.

    In the Scottish Government evaluation of the bid which led to the proposal, it was considered that this area did, or was likely to, meet each of these conditions. In preparing geographic options for consultation, the analysis we had undertaken had reached a similar conclusion.

61. Nevertheless, views on this in relation to the three geographic options we consulted on were mixed in line with respondents' views on whether they supported or opposed the National Park. Overall, over 45% of respondents agreed the general area met conditions 1 and 2 of the Act while under 25% considered it did not and 17% considered it did partially. In contrast only 33% of respondents considered it met condition 3 while 45% considered it did not with only 7% considering it met this condition in part. The balance of these views was broadly consistent across the geographic options.

62. Both the natural beauty of the area (including aspects of its landscape variety, sense of 'wildness', dark skies, geological significance and species and habitat diversity) and its rich history and historic environment were seen to contribute to the area's national importance and distinctive identity and coherence. Many responses, including a roughly equal number of opponents and supporters of the proposal, also suggested that the region's agricultural heritage contributed significantly to meeting these two legislative conditions. In contrast, several responses suggested that Galloway was no more special

or distinct than other areas of Scotland, a view much more widely held among opponents of the proposal than supporters.

63. Much less commentary was received on the special needs of the area. Those in favour of a National Park tended to conclude a National Park was needed to address the special needs of the area. Those who were not in favour of the proposal or undecided challenged this, or argued the costs of a National Park were not justified to tackle the issues facing the area; or that existing mechanisms and approaches were adequate. Little was said directly on the issues facing the natural and cultural heritage which a National Park could address.

Views on possible alternatives to National Park status

64. Around 20% of responses proposed no alternative to a National Park and this was the most common category of response overall.

65. Opponents of the proposal offered more alternatives than supporters. These respondents particularly favoured direct investment in local infrastructure and services, as well as supporting existing mechanisms perceived to be currently doing the job of a National Park including the Biosphere Reserve and the Galloway Forest Park. SOSE made the case for developing a new place-based mechanism for delivering the South of Scotland natural capital innovation zone. Reasons for these alternatives included less bureaucracy, greater local control over decision making, increased community involvement in the protection and regeneration of the area and the lack of consensus over the National Park proposal.

66. In contrast, two-fifths of respondents who supported the proposal argued that there was no alternative available as strong as a National Park.

67. Nearly 20% of both opponents and supporters were also in favour of a stronger role for the Biosphere Reserve whether a National Park was established or not.

Reporter assessment of the findings of the consultation

68. From this survey data, we would draw out the following points:

    a) Opinion on the proposal is highly polarised and the results are not as conclusive as the headline data may suggest. The inclusive way the three-survey approach was designed means that there is some double counting of responses from the same respondents across the three surveys. The open nature of the National Park proposal and the options we consulted on for it also mean that treating these results as definitive is problematic.
    b) Across the surveys and public consultation events, it is notable that the strongest in principle position was held by opponents to the proposal, which could suggest a

more value-based judgement about the principle of National Park, whatever its final location and form may take. In contrast, those more minded to support a National Park were more nuanced in their position and were generally keener to see the final detail of what it would entail in practice. In that sense, those in support of the National Park were more aligned with those who were undecided.

c) A small overall majority "strongly" or "tend to" oppose the proposal – circa 51% of responses from individuals to the summary leaflet and 54% of all responses (the bulk of whom are individuals living or working in the area). In the public consultation events, 64% of participants who expressed a view using the H-diagram were opposed to the National Park though this represented 46% of the total number of people attending these meetings (with 54% being neutral or positive or deciding not to take part in this exercise).
d) In the survey responses, the balance between public support for and opposition to the proposal varied across and near to the proposed area of the National Park, with support stronger in central, northern and more urban postcode areas and strongest opposition in the eastern parts of the area and southern parts of the Rhins. A similar geographic pattern in opinion can be observed from the public consultation events.
e) There were relatively few responses to the surveys from students or people in full-time education with responses generally reflecting the overall survey trends. Through our work with schools and youth panels, we did engage with a significant proportion of young people of school age across the area (over 1500 in total), thus raising awareness and understanding of the issues raised by the proposal. The outputs from the engagement covered a similar range of issues and opportunities to the general debate; economic topics were more evident than environmental or social ones. The young people we met and heard from were engaged and courteous, open to exploring the issues, mature in expressing their views and respectful in listening to the views of others, which bodes well for the future of the area irrespective of whether a National Park is designated or not.
f) Some 400 (8%) of all responses were reported from businesses with support ranging from 20% to 35% and opposition ranging from 61% to 75% of all responses depending on the survey type. Farms and other land-use related businesses represented 60% of business responses and had a significantly higher level of opposition to the National Park proposal than other types of businesses with 15% supporting the proposal and 81% opposed. Business responses, other than those from those working in farming, forestry or land indicated an aggregated support of 58% in favour of the National Park.
g) The complex mixture of views in the public responses to the proposal is matched by the key stakeholders. Two of the three local authorities supported the proposal (East and South Ayrshire) and sought a larger part of their areas to be included. The third (Dumfries and Galloway) are undecided pending the final detail of the National Park proposed by Scottish Government. A supporter of the original National Park bid, SOSE, now advocate an alternative and innovative approach that "looks to build and invest in what is already working, maximising the social, environmental and economic impact to deliver growth and benefit nature".
h) In terms of other stakeholders, support is greatest among the environment, recreation and tourism sectors while opposition is strongest from landowners, land managers and the farming, forestry and renewables sector.

i) In supporting the proposal Scottish Environment Link and other national and local organisations championed the role that National Parks play in tackling the climate and nature emergencies through supporting sustainable integrated land management, nature recovery, climate action and the improved wellbeing of local communities. Likewise, the Forest Policy Group saw National Park designation as an opportunity to make the region a centre for Forestry Excellence through enhanced resilience, diversification of the regional bioeconomy and wider appreciation of the multi-functional value of woodland and natural heritage.
j) VisitScotland provided insight from the existing National Parks into the opportunities for growing the visitor economy and responsible tourism that this designation could bring to Southwest Scotland. In supporting the proposal, they also welcomed the significant role a new National Park could play in educating visitors, in the investment of visitor infrastructure and "in helping deliver a joined plan to encourage the respect, protection and enjoyment of the southwest of Scotland."
k) South of Scotland Destination Alliance (SSDA), Scottish Land and Estates (SL&E) and the National Farmers Union Scotland (NFUS) carried out their own polling of members. While not providing a position itself, SSDA noted that two thirds of the members who responded to their survey were supportive of the proposal seeing the benefits for them from growth in the tourism-related economy of National Park status. In contrast, the SL&E and NFUS polls emphasised the significant opposition to the proposals by over three quarters of their members who responded underpinned by concerns over what they saw as additional bureaucracy and regulation and the uncertainties about what it would mean in practice for their business.
l) The responses from both CONFOR and Scottish Renewables provided economic data on what they saw would be significant negative impacts for their sectors and associated Scottish Government targets for the economy and climate that they considered would result from National Park designation. The former highlighted the 20% drop in commercial Sitka production in the existing National Parks since designation. The latter suggested that in their predicted worst case with strict restrictions on new wind farm development, up to 1.7GW of onshore wind capacity; £543 million Gross Valued Added (GVA) and 467 jobs per year would be at risk.
m) While we consulted on a terrestrial area for the National Park, a number of comments were also received on coastal and marine issues, emphasising the need for a National Park to engage positively in the management of this zone and work closely with fishing interests. Dumfries and Galloway Council also suggested extending the boundary into the marine environment to the 3nm limit.
n) While not providing a formal position on the proposal, both health boards submitted responses to the consultation. NHS Ayrshire & Arran "welcomed the aspirations of a National Park given the combined potential benefits for our population and planet." The detailed Health Impact Assessment (HIA) they provided raised a range of potential benefits for public health and their operations but also noted potential impacts on service delivery which would need careful consideration, including increasing demand for A&E and longer travel times for ambulances and care services. NHS Dumfries & Galloway noted a similar range of issues, and argued that should a National Park be designated, "it will be critical that this becomes an opportunity to innovate with other Community Planning partners to address the challenges the region faces."

o) Comparatively little detailed comment was generated on possible alternatives to a National Park with those more in favour of considering this option tending to oppose a National Park. While awareness of the Biosphere Reserve is generally quite low, both opponents and supporters were also in favour of a stronger role for the Biosphere Reserve whether a National Park was established or not.

Reporter assessment on the views expressed on the potential benefits and drawbacks of a Galloway National Park

69. Both support for a National Park and opposition to it have been passionately made, and in the accompanying reports which detail the responses across the three surveys, we have selected a range of quotations to try to illustrate the key points made. A small selection is provided in Annex D.

70. The possible advantages and disadvantages identified in the responses to the consultation mainly build on the ones identified during the pre-consultation phase of work. Information and briefings provided by organisations on both sides of the debate have also influenced the range and presentation of the arguments presented in the responses. First-hand experience – particularly of the nearby Lake District National Park – as well as material drawn from English and Welsh experience of National Parks more generally have also influenced some of the public views expressed, even though the National Park approach in Scotland is distinct to the UK as a whole.

71. In terms of the arguments made for a National Park, the key themes from the consultation were mainly based around the enhanced action it would deliver to protect and restore the natural and cultural heritage of the area, the range of economic and social benefits it would bring, the stronger local voice it would provide in decision making and the positive recognition it would bring to this part of Scotland.

72. In terms of the arguments made against the proposed National Park, some of the key themes from this consultation can be summarised as follows:
    a) Community concerns focus on the impact of more visitors on existing infrastructure and services – with the capacity of the A75 and health services being specifically cited; the impact of more visitors on the area both on the natural and cultural heritage and the quietness of the area (which is particularly valued by both residents and visitors alike); and concerns over another level of administration which they have limited influence on, and funds being invested in a National Park administration which would be better invested in existing organisations to address these problems.
    b) Land management concerns focus on the perception of increased regulation, delays to decision making, more visitors impacting on their operations, more visitor traffic on roads impacting on their operations and possible future planning constraints by the National Park Authority or Scottish Government. For the commercial forestry sector, there are concerns that this would result in this area losing its economic competitiveness with knock-on implications for timber production and the viability of the ecosystem of sawmills and wood manufacturing businesses. The impact on the positive interrelationship between public and commercial forestry production in this area also needs to be considered.

c) The renewables sector described the risks to the future supply of renewable projects that they saw arising from a National Park in this area. In their view, the scale of this threatened climate change targets for reducing carbon emissions, undermining the case for a National Park on environmental grounds.

73. The focus on social and economic issues presented in the case both for and against is notable with less attention overall given to the case for and against in natural heritage terms. Some of those opposing the National Park consider the current model as potentially damaging to the very natural and cultural heritage it has been designated to look after and enhance, based on the increasing popularity that may come with National Park status. Taken out of context, and without any timeframe on it, the original bid's reference to 500,000 extra visitors has also caused significant concern. This number is in keeping with trends in visitor numbers over 20 years in the Cairngorms, the aspirations of the current responsible tourism strategy for South of Scotland and more general increases in countryside recreation and tourism that have already taken place across Scotland, particularly post Covid-19, including in Galloway itself.

74. Based on the consultation paper, **Table 8** and **Table 9** below provide a summary of the main positions "for" and "against" the National Park and both provides our commentary as Reporter on what the evidence available suggests on each theme, and our assessment of its significance to the consideration of this proposal. The tables draw on our knowledge and experience of the existing National Parks in Scotland but also require a judgement by the Reporter of its potential relevance to Southwest Scotland.

75. For several reasons, this is not a precise science, nor is there much longer-term quantitative evidence to draw on especially for some of the possible negative impacts. Other key factors in such assessment which are unknown at present are the choice of the geographic area for the National Park, the detailed arrangements for the Park Authority and how this new body would seek to plan and manage this area once designated. Conversely, it is also important to consider what would happen in the area without the designation. For example, if realised, the widely desired improvements to the A75 and other trunk roads will increase accessibility to the area, potentially exacerbating existing visitor management issues irrespective of National Park status. Equally, economic factors will lead to further changes in land-use resulting in further intensification of dairy production, upland afforestation replacing upland farms and a further step change in the number and size of wind farms and related grid infrastructure. While difficult to quantify, the role of a future National Park in helping to manage these predicted changes also needs to be considered.

Table 8 - The perceived benefits of National Park status for Southwest Scotland

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium-low[3])	Reporter commentary on the evidence base and its relevance to Southwest Scotland	Reporter assessment of its significance for the consideration of the National Park proposal (high-medium-low)
Environ-mental benefits	Increased action to help tackle the climate emergency, reverse biodiversity loss and protect the valued natural and cultural heritage of the area	H	There is good evidence that this specific focus of National Parks and their ability to develop effective partnerships and bring in funding facilitates a range of action for key species, habitats and landscapes. The typical condition of nature designations in the two Scottish National Parks is currently the same or better than the national picture (in comparison to the rest of the UK). Both Parks also have two of the largest landscape scale nature recovery projects in the UK, with ambitions to do more. In contrast, there is little evidence available on the specific contribution of the existing National Parks to the historic environment beyond normal expectations of most local planning authorities. A better evaluation of long-term state of nature trends would be needed to assess the difference the National Park designation makes both for biodiversity and the historic environment. Action to tackle the climate emergency is primarily being delivered though peatland restoration expanding woodland cover in National Parks. Both Scottish National Park Authorities are also investing in active and public transport infrastructure and are part of the UK National Park initiative to become carbon sinks. As well as improving the carbon absorbing capacity of key habitats, this will require significant effort to reduce car-based visits. The Strategic Environment Assessment	H (high for action for nature but lower for action on the historic environment and climate)

[3] Based on percentage of responses which referred to this issue (L 0-5%, M 5-15%, H 15%+).

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium-low[3])	Reporter commentary on the evidence base and its relevance to Southwest Scotland	Reporter assessment of its significance for the consideration of the National Park proposal (high-medium-low)
			(SEA) undertaken by Scottish Government suggests that a larger area would bring more benefits both for nature and climate, though this has been challenged by the renewable sector on the assumption that any National Park area would restrict onshore windfarm development.	
	Better promotion, provision and management of access, outdoor recreation and education, and sustainable tourism	M	There is significant evidence of a range of action that National Park Authorities deliver in this area which is over and above what is happening in other parts of Scotland. Examples include branding and marketing of the area; strategic planning and investment in infrastructure; provision of large ranger services and funding for others within the area; active collaboration with Police Scotland; and the use of bylaws. The Loch Lomond & the Trossachs National Park was specifically established to address visitor management issues while post Covid-19 this has become a more important operational issue within the Cairngorms National Park. A National Park in Southwest Scotland would help tackle some of the existing issues the area faces and address any new ones that may arise from increasing number of visitors/visitor behaviours predicted by the regional tourism strategy.	H
	Better long-term regulation and planning of key land-uses including forestry, farming and renewables	M	The evidence base is mixed and likely to be specific to each National Park area depending on the mix of land-uses and the issues and opportunities that have arisen. The changes for EIA regulations with National Parks are very limited for agriculture but more significant	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium-low[3])	Reporter commentary on the evidence base and its relevance to Southwest Scotland	Reporter assessment of its significance for the consideration of the National Park proposal (high-medium-low)
			for forestry operations which may have contributed to some of the decline in commercial forestry reported in both existing National Parks – though this may also have led to more planting in other areas of Scotland. More generally, both National Park Authorities have higher performance standards than most planning authorities and approve a higher proportion of development proposals for built development. Both the existing National Parks are regional land-use pilots, with the National Park Plan and forestry strategies prepared for the existing Park areas seen as key tools for the better longer-term planning and co-ordination of land-uses.	
Social and economic benefits	Economic recovery through increased trade and opportunities for existing and new businesses	H	There is good evidence on economic benefits of National Park designation, especially through developing the visitor economy, with the existing National Park areas estimated to generate over £700 million of economic impact per annum in their visitor economies alone, more than 30 times the £22 million invested in them by the Scottish Government each year. The research does not currently consider alternative scenarios or compare with other similar areas. The impacts on established land-use sectors have also not been specifically reviewed though diversification of farm business is generally supported in both existing National Parks.	M
	Direct and indirect jobs and external investment in the area	H	A range of direct and indirect jobs are created by National Park designation, and this would likely be the case for a National Park in Southwest Scotland. The existing	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium-low[3])	Reporter commentary on the evidence base and its relevance to Southwest Scotland	Reporter assessment of its significance for the consideration of the National Park proposal (high-medium-low)
			National Park Authorities employ a total of circa 250 staff directly, with many requiring professional qualifications and experience, such as countryside rangers, planners, ecologists, archaeologists or education officers. While the scale may be different, a similar range of skills and expertise would be needed for a new National Park bringing much needed professional jobs to the area. It is likely that new jobs and external investment in nature recovery would also be created. The impact on jobs in established land-use sectors has not been reviewed. Some concerns have been noted over the potential impact on existing organisations seeking to recruit similar professional roles as the National Park Authority though this could equally be positive in terms of expanding the pool available.	
	Opportunities for more young people to stay in the area	L	The evidence base on the impact of Park status on young people in the area is limited. Nevertheless, both National Park Authorities are very active on this issue with youth members on their boards and youth councils to ensure the voice of young people is heard in decision-making. The Cairngorms National Park Authority has supported the development by young people of a youth manifesto for their National Park while both have put in place programmes of training and employment for young people.	L
	Positive support for land managers	L	There is good evidence of a range of action by both National Park Authorities including advice, networks, funding and support for diversification and the development of strategies to encourage more	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium-low[3])	Reporter commentary on the evidence base and its relevance to Southwest Scotland	Reporter assessment of its significance for the consideration of the National Park proposal (high-medium-low)
			woodland. However, the mainstream funding for agriculture and forestry remains with Scottish Government with a national approach taken which generally does not give any additional support for land managers in National Park areas.	
Added value of a National Park	Elevated status of the area and increased funding for its improvement	H	There is good evidence of a range of action by both existing National Park Authorities and others which increases direct and indirect funding to their areas to deliver a range of projects across the four Park aims. The Cairngorms National Park Authority has secured over £35 million of additional funding into the Cairngorms over the past two decades, over and above core grant in aid from Scottish Government. It is currently in the 2nd year of its 10-year Horizon 2030 project with circa £12.5 million of support from National Heritage Lottery Fund (NHLF))	H
	A stronger local voice in planning and managing the area	L	There is significant evidence of a range of action within National Parks which supports local empowerment including direct representation on the Park Board, active community engagement in the preparation of the Park Plan and related initiatives such as community action plans and place planning. Both existing National Park Authorities have also established a range of topic-based fora and groups that involve a wide range of local people.	M
	A greater spotlight on community development aspirations	L	There is significant evidence in both existing National Parks of greater recognition for community aspirations provided by the Park Plan and related initiatives such as community action plans, place planning and visitor management	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium-low[3])	Reporter commentary on the evidence base and its relevance to Southwest Scotland	Reporter assessment of its significance for the consideration of the National Park proposal (high-medium-low)
			bylaws. Both existing Scottish National Parks have National Park Trusts which distribute funding to community projects across their areas – for example, the Cairngorms Trust has delivered circa £12m of funding and supported 44 projects over the last two rounds of its Community Led Vision Fund.	

Table 9 - The perceived dis-benefits of National Park status for Southwest Scotland

Topic	**Key themes raised by respondents to the consultation**	**Frequency cited in responses (high-medium – low)** [4]	**Reporter commentary on the evidence base and its relevance (high-medium- low)**	**Reporter assessment of its significance for the proposal (high-medium-low)**
Environ-mental dis-benefits	More pollution, littering and irresponsible/illegal visitor behaviours	H	While an important issue, the evidence base to support this is limited. While National Parks are not immune to these issues, there is nothing to suggest that these are any better or worse in these areas compared to any other comparable areas such as the NC500 or on Skye. What National Park status does bring is a renewed focus, powers and funding for proactively addressing access and recreational and visitor management which can both prevent many issues arising and address them when they do. This focus will be required for this proposal given the range of access and visitor management issues already reported in parts of the proposed area and the aspirations of the responsible tourism strategy to grow the visitor economy.	M

[4] Based on percentage of responses which referred to this issue (L 0-5%, M 5-15%, H 15%+).

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium – low) [4]	Reporter commentary on the evidence base and its relevance (high-medium- low)	Reporter assessment of its significance for the proposal (high-medium-low)
	No greater constraints on further wind farm developments	M	Uncertain - Depends on Scottish Government policy and choice of area given that parts of the Galloway Forest Park and all three National Scenic Areas (NSAs) already have existing restrictions. While the current pattern of wind farms has been well planned from a biodiversity and landscape perspective, there is pressure for further significant development of new ones and additional grid infrastructure which could transform parts of the largest area being considered. On the other hand, evidence presented by the renewables sector could suggest significant negative impacts on climate targets if a National Park was designated.	H
	Not enough recognition given to protecting the natural and cultural heritage	L	The evidence base to support this is limited and given the aims, powers and funding of existing National Parks they are more often accused of doing too much on this rather than too little. As noted above better evaluation of long-term trends in the state of nature and the built environment in National Park areas would be useful to consider this further. Specific concerns which would need to be addressed through the planning and management of this area include the quiet and unvisited character of much of the proposed area and its attractiveness to larger scale wind farm development.	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium – low) [4]	Reporter commentary on the evidence base and its relevance (high-medium- low)	Reporter assessment of its significance for the proposal (high-medium-low)
Economic and social dis-benefits	Additional bureaucracy and restrictions on land managers	H	There is some evidence of impacts on forestry operations but very limited evidence of impacts on farming operations in the existing National Parks because of changes to the EIA regulations. This is very likely to be the case for Southwest Scotland given the commercial scale most of the dairy farms are already operating at which will mean that many of their activities are already covered by the EIA requirements which apply nationally. Regulation and funding remain with national government though some farm specific issues and opportunities were identified around planning, traffic and visitor management, though impacts on business viability is unknown and further research would be useful.	L (medium for forestry operations)
	Increase in house prices/decrease in affordable housing	H	The evidence base is limited on the actual impact of designation on the housing market in Scotland, though both National Park Authorities recognise the issue and are very active in trying to address the housing issues in their area, working closely with the local (housing) authority and others to increase the provision of affordable homes. Further research would be useful to look at the specific impact in Southwest Scotland, where there is a higher proportion of second homes.	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium – low) [4]	Reporter commentary on the evidence base and its relevance (high-medium- low)	Reporter assessment of its significance for the proposal (high-medium-low)
	Busier roads, congestion and road traffic accidents with implications for businesses	H	The evidence base is limited. While the area would attract more visitors, experience from the existing National Parks suggests that this is likely to be gradual and can be planned for given sufficient funding. However, given that in 2022, there are currently 6.04 road casualties per 10,000 population in Dumfries and Galloway, compared to 3.58 for Scotland as whole this would need careful consideration. The volume of forestry lorry movements in the area is also significant and interactions with visitor traffic may need specific attention. Transport Scotland has indicated that from a national perspective the pressures on the trunk road network and specifically the A75 and A77 were not extraordinary and could be addressed as they arise (as is the case for the implications of other major developments). They also saw benefits of Park status for the retention and development of public transport services.	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium – low) [4]	Reporter commentary on the evidence base and its relevance (high-medium- low)	Reporter assessment of its significance for the proposal (high-medium-low)
	Restrictions on further wind farm developments	M	Uncertain - Depends on Scottish Government policy and choice of area given that parts of the Galloway Forest Park and all three NSAs already have existing restrictions. Evidence presented by the renewables sector could suggest significant negative economic impacts if a National Park was designated with an associated loss of community funding, though this is based on modelling of an unspecified number and location of future developments which may or may not come forward or be consented and developed in a future National Park area.	H
	Increased pressure on local health services	M	The evidence base to support this is limited. Both NHS Boards noted potential benefits in terms of health outcomes but also potential impacts on A&E services and on their ability to recruit and retain staff in the area which is already challenging. The Loch Lomond & the Trossachs National Park Authority has noted that work of emergency services at some hot spot locations can occasionally be impeded by congestion and irresponsible parking though given the popularity of parts of the area, it is likely that this could be happening irrespective of National Park status.	L

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium – low) [4]	Reporter commentary on the evidence base and its relevance (high-medium- low)	Reporter assessment of its significance for the proposal (high-medium-low)
	Impact on jobs - increase in low skilled, seasonal jobs, decrease in skilled employment i.e. agriculture	M	The evidence base to support this is limited both in terms of the impacts on low paid job creation, but also on more skilled land-use jobs. Further research would be useful to look at the specific impact in Southwest Scotland given this area's reliance on the farming, forestry and renewable sectors and also its existing low wages. The research commission by Scottish Renewables also needs to be considered carefully.	M
Lack of added value with the National Park model	Time and money better spent elsewhere (in existing services and enforcing existing policies)	H	The evidence base to support this is limited. Public funding would need to be invested in the proposed National Park. However, in practice the additional environment funding from Scottish Government which comes through Park designation is not likely to be made available to existing planning and other service budgets of local authorities and public bodies if a National Park was not designated. We note this is an issue for the Scottish Government to consider not the Reporter.	L
	Greater national control over local decision making	M	The evidence base to support this is limited. National Park designation brings more national interest and involvement in this area but also greater local influence over national funding and priorities. How a Park is run and governed and how it works alongside and for its communities and in partnership with others would be critical for its long-term success.	M

Topic	Key themes raised by respondents to the consultation	Frequency cited in responses (high-medium – low) [4]	Reporter commentary on the evidence base and its relevance (high-medium- low)	Reporter assessment of its significance for the proposal (high-medium-low)
	National Park status will perpetuate the idea that the area is 'natural' which it isn't	L	The evidence base to support this limited. Farming, forestry and estate management are fundamental to the special qualities of Scotland's existing National Parks and are equally if not more important for this proposed area and a National Park Authority would need to reflect this in its planning, management and marketing of the area.	L

Reporter conclusions on the principle of a National Park in Southwest Scotland

Discussion

76. The engagement and the consultation work we have undertaken have demonstrated the considerable polarisation of views within and beyond the proposed area on the proposal. These positions also strongly influenced views on whether alternative options to a National Park were either more desirable or less effective. We are also mindful that we have yet to hear directly from a significant number of people across the area.

77. Support for the proposed National Park is widespread among environmental, recreation and tourism organisations, and many households and individuals across the proposed area. From our national survey, we know that wider public opinion nationally is strongly in favour both of new National Parks in general and also of one specifically in the Galloway area. Both South and East Ayrshire Councils are supportive, while Dumfries and Galloway Council have reserved their position until they see the detailed arrangements proposed by Scottish Ministers. Many who expressed support for the proposal expressed similar caveats while those who remain undecided are seeking greater clarity about how a National Park would operate in this area and what it would seek to do. We would also note that the significant opposition to the National Park proposal has created a challenging environment for individuals and some organisations who wanted to engage in the discussion of this proposal to consider the issues it raises and to make their voices heard. From the anecdotal evidence we have heard both from businesses and other stakeholders in the area, as well as experience of the public consultation events, we strongly suspect that support for the National Park proposal is underrepresented in the consultation responses. This is also confirmed by the reports prepared for us by Outside the Box and SCDC.

78. At the same time, there is clearly significant and well organised opposition in principle to the proposed National Park, especially from land managers and businesses associated with the farming, forestry and renewables sectors. Many households and individuals are also strongly opposed to the National Park proposal, fearing significant impacts on their everyday lives.

79. The core of this opposition is based on concerns over the potential negative economic impact to these key sectors, fears of overtourism, the impact on local infrastructure and services and concerns over the appropriateness of a National Park solution for the area. We would note that many of these issues raised in the responses to the consultation are not supported by strong evidence of how existing National Parks in Scotland operate, or more detailed consideration of how a National Park could be tailored to Southwest Scotland to address these concerns. **Nevertheless, it is clear the level of opposition in principle is significant and is something that Scottish Ministers need to give careful consideration to as they consider next steps.**

80. Following the consideration of this advice, the next step is for Scottish Ministers to determine whether to proceed or not with the designation process for the proposed

National Park. On the basis of the consultation, we consider that Ministers have three scenarios they can now consider:

a) Maintain existing arrangements
b) Strengthen existing arrangements or develop new ones
c) Prepare and consult on a draft designation order.

Scenario A: Maintain existing arrangements

81. As part of this scenario, Scottish Ministers could consider putting in place a mechanism for further discussion of the issues facing the area highlighted by the consultation. This might include a citizen's panel or assembly which would allow a more positive and constructive dialogue to take place, with a wider focus on the development of a strategy for the just transition of the area to net zero in ways which better support nature recovery and community wealth-building. Citizen's panels in particular offer an opportunity for considered debate and opportunity for participants to hear and question contrasting perspectives on issues and have been effective in developing common ground when complex choices and trade-offs are being considered. This may be particularly helpful if Scottish Ministers consider that the most pressing issues raised during the consultation are largely outwith the scope of a National Park to address.

82. This option leaves existing mechanisms to tackle the range of deep-seated economic, social and environmental issues the area increasingly faces that led to the submission of the bid and were key parts of the debate on it.

Scenario B: Strengthen existing arrangements or develop new ones

83. A number of changes to the existing arrangements could be made to strengthen the management of the area to tackle some of the issues which have featured in the discussion over the National Park proposal, including the following:
    a) a stronger role for the Biosphere Reserve – this would require the strengthening of national policy recognition and a more long-term funding arrangement put in place;
    b) a more integrated and inclusive approach to the planning and management of the Galloway Forest Park to deliver multiple benefits through a Park wide plan with additional funding allocated to nature restoration and provision for recreation and tourism; and,
    c) the preparation and implementation of refreshed management strategies by Dumfries and Galloway Council for the coastal National Scenic Areas or the coast as whole, with a particular emphasis on visitor management and community development.

84. New approaches could also be considered, including mechanisms to take forward the action on the ground that is needed to implement the natural capital innovation zone, the regional land use framework or one of the landscape scale restoration projects identified in the Scottish Biodiversity Strategy Delivery Plan. Each of these new approaches would need an organisation to lead and bring together a partnership to plan and deliver it.

85. This option has many of the benefits and some of the drawbacks of the first but would show positive action to tackle the issues facing the area. Using a non-statutory approach or approaches could be more cost effective, flexible and quicker to progress, though additional funding would still be needed to implement them. However, unless planned and funded well, the option could be perceived as an additional initiative or partnership approach when the area already has many in operation, though none have the impact that the statutory basis, policy footing, significant funding and longer-term approach of a National Park brings. Any of the alternatives would also have weaker brand recognition than National Park status brings so may bring less benefit to the visitor economy or in terms of raising the profile of the area more generally.

Scenario C: Prepare and consult on a draft designation order

86. This option would mean that Scottish Ministers were now minded to designate a National Park, subject to the successful outcome of further consultation on the draft designation order. Progressing to this step would enable a more detailed examination of specific options which many of those consulted felt would have facilitated more constructive discussion and examination of the impact of a National Park on their areas of interest. In providing clarity on the Scottish Government's views, it would enable a detailed test of the merits of a proposed National Park.

87. Such an approach would acknowledge the existing support for a National Park at this stage though it will also certainly be criticised by some communities and stakeholders. It would require more budget than the other options, but the strong track record of the existing National Parks clearly suggests it would deliver more for nature and for people. It would also provide the benefits of the National Park brand and help raise the status of the area nationally and more widely.

88. If the consultation on a draft designation order is progressed, it would be important to provide a simple "prospectus" for the National Park alongside the draft designation order on the Government's thinking on its vision, mission and funding. This should include clearer policy signals on how a National Park would work to support farming, forestry and renewables in the area. In developing the detail of the draft designation order, Scottish Government should also begin to work closely with staff from key organisations such as Forestry and Land Scotland, SOSE and the three local authorities. More detailed environmental and economic impact assessments would be required at this stage too, and we would propose that this is expanded to include the preparation of a Health Impact Assessment with close involvement of both health boards.

Reporter Advice

89. In considering the complexity of the issues raised by the proposal and the consultation we have undertaken on it, we are, as the Reporter, very mindful of the balance needed to ensure our advice is seen as fair, evidence-based and practical.

90. From the detailed discussions during the consultation, we remain of the view that the proposed area would meet the legislative conditions of the Act. In particular, we would note the following:
    a) The high natural and cultural heritage **value** and **coherent identity** of the area which while different to existing National Parks is special and of significance in the Scottish context.
    b) The **challenges** that nature increasingly faces given the scale and intensity of farming, forestry and renewables and **opportunities** for achieving more sustainable outcomes.
    c) The important **socio-economic context** – an area of considerable significance for food, timber and energy security but one which is doing less well than other rural parts of Scotland.
    d) The added value that a National Park could bring in terms of addressing the special needs of the area:
        - the significant potential for **nature recovery** across the area;
        - helping the transition to sustainable forestry practice in keeping with the **route map to resilience for forests and woodlands;**
        - improving **co-ordination of existing land-uses** and land-users to deliver economic, social and environmental outcomes;
        - realising the ambitions for **sustainable and responsible tourism, the regional economic and health strategies** for the area and the natural capital innovation zone; and
        - providing a stronger platform for realising **community ambitions.**

91. The analysis of the consultation exercise we have undertaken has shown that the outcome is more inconclusive than the headline data from the surveys may suggest. Nevertheless, while two of the three local authorities are supportive of it, the largest is now undecided. It is also clear that there is significant nervousness about the proposal, or direct opposition to it, across many communities and businesses which was not as evident in the reporter consultation for Scotland's first two National Parks.

92. The decision on whether to proceed or not is ultimately a choice for Ministers, though it should be informed by the available evidence. Of the three scenarios outlined above, we consider that B or C have the strongest potential for meeting the Scottish Government's priorities for tackling the nature crisis, taking the action needed on climate change, growing the rural economy and realising more value from public services. Putting in place a mechanism as proposed in Scenario A such as a regional citizen's panel for further discussion of the issues raised by the consultation does not appear to deliver many or any benefits quickly, though, if led well, it could have a useful role in bringing the communities and stakeholders together after what has been a polarising debate to date.

93. As the Reporter, our assessment suggests that while the case for a National Park in Galloway remains a strong one in terms of the conditions of the Act, our analysis of the issues raised and of the range of views expressed during the consultation suggests that the proposal has not at this stage garnered sufficient support locally. **Our**

recommendation is therefore not to proceed with the designation but instead to strengthen existing arrangements.

94. Further discussion with the local authorities and a range of public bodies would be needed to make sure a proposal for this was agreed with sufficient long-term funding of five to ten years made available to make it happen. In view of the range of issues raised by the proposal and the consultation on it, key elements of the strengthened arrangements which should be considered would include:

- **a strengthened and better resourced GSA Biosphere Reserve with a stronger focus on nature recovery and community wealth-building;**
- **the development of a new strategic plan for the Galloway Forest Park area which placed greater emphasis management for people and nature alongside commercial forestry operations;**
- **a renewed commitment to the management strategies for three National Scenic Areas and for the completion of the coastal path as a key visitor attraction for the area;**
- **sustained investment in access and visitor management across the area building on the existing community led approaches such as Whithorn and Loch Doon;**
- **progress with the implementation of the regional land-use strategy for the area; and**
- **on-going support for the work of the Solway Firth Partnership.**

Given both the urgency of the climate and nature emergencies and the considerable interest and energy generated by the proposal, the action to deliver these strengthened arrangements should be put in place as soon as possible.

Section 4 - The arrangements for the proposed National Park if Ministers decide to proceed with designation

95. **This section of the advice considers the detailed arrangements for the National Park if Scottish Ministers decide to proceed with drawing up a draft designation order for consultation.** Overall, there was less detailed comment on this part of the consultation compared to the questions on the principle of the National Park and further work will be needed to develop some of the detailed arrangements for the National Park.

The area of the National Park

96. Based on our assessment of the area (see Annex E for details), we consulted on three geographic options – as follows:

Option 1 - 'Hills and coast'
Option 2 - 'Hills and extended coast'
Option 3 - 'Hills, coast and countryside'

Of these options we consulted on, the largest area proposed was the most popular with those who expressed a view on this question, with views on Options 1 and 2 more even. A similar pattern emerged from suggestions made at the consultation events. Of the 30 hand drawn maps of the area submitted, 8 were variations on Option 3, though 8 were of the Galloway Forest Park area.

Table 10 - Option area preference by aggregated support / opposition to the proposal - Surveys

Preference	Overall		Support		Oppose		Undecided		Blank	
Option 1	575	11%	212	10%	326	12%	35	21%	2	8%
Option 2	432	8%	358	16%	46	2%	27	16%	1	4%
Option 3	1649	32%	1497	67%	99	4%	47	28%	6	25%
Don't know / no opinion[5]	1208	23%	91	4%	1073	38%	42	25%	2	8%
None[6]	200	4%	-	0%	196	7%	4	2%	-	0%
Other[5]	30	1%	15	1%	8	0%	7	4%	-	0%
Blank	1136	22%	56	3%	1062	38%	5	3%	13	54%

[5] Applies only to Technical Survey
[6] Applies only to Summary and Paper surveys

Table 11 - Option area preference by aggregated support / opposition to the proposal - Public consultation events

Preference	%
Option 1	5
Option 2	4
Option 3	19
None of the above – I'd prefer another option	2
None of the above – I don't know at this stage	3
None of the above – I don't want a National Park	29
Did not take part in the exercise	38

97. The respondents who preferred Area Option 3 believed that that the larger area would maximise the landscape and habitat diversity within the proposed National Park and extend its benefits to more communities. About a quarter of these respondents also felt that Option 3 offered the greatest potential economic benefits and offered more opportunity for conservation and efforts to tackle climate change. All three local authorities were in favour of the largest option with both Ayrshire councils seeking consideration of extending a larger National Park covering more of their areas.

98. Nearly 20% of responses that stated a preference for Area Option 1 felt that a smaller Park area would reduce the negative impacts on the surrounding area. Some were strongly of the view that areas of agricultural land and major settlements should be excluded, with a smaller National Park area focusing on the most outstanding areas of natural heritage. This option was also preferred as the 'least-worst' scenario by those who opposed the proposed National Park, and we would anticipate would have scored more highly if many more of those opposed to the creation of a National Park had expressed a view.

99. Very few detailed comments on the options were received (circa 3% of all responses to this question) with broadly similar numbers of respondents raising issues with each option. The most commonly made comment was about the benefit of extending the boundary to include coastal and marine areas within the National Park, and specifically to include all of the Luce Bay and Sands SAC, Wigtown Bay Local Nature Reserve and marine area of the three National Scenic Areas. Another theme was the inclusion or exclusion of more intensive agricultural land, with the latter being preferred. When specific settlements were mentioned, more respondents (two to four times more) supported including rather than excluding that settlement. The exception to this is the summary consultation on excluding the Ayrshire settlements. A number of suggestions were also made for extending Option 3 eastwards to include Mabie Forest and Moniaive as well as Annandale and Eskdale and the whole of Dumfries and Galloway.

Boundary considerations

100. Over 50% of respondents who responded to this question considered that the proposed principles were a good basis for drawing up a more detailed basis for the boundary with a third suggesting that they were not. Some specific boundary recommendations were put forward, such as including or excluding certain settlements or features.

101. Several responses focused on landscape features and their suitability for developing a boundary. Such responses were primarily made by supporters of the proposal. Several participants suggested that rivers and watersheds would make logical landscape boundaries, however some also cautioned against using rivers due to their propensity to move over time. The complexity of drawing up a Park boundary at the coast or foreshore was a particular focus. In particular, responses touched on what agreed reference points should be used at the coast, as well as the merits and practicalities of extending the Park extent further into the marine environment.

102. Other responses suggested that boundaries should avoid splitting communities, farms, land parcels and other smaller administrative units such as school catchments and council wards. Others also proposed that the Park utilise existing designation or administrative boundaries in drawing up its extent.

103. A number of alternatives to a rigidly bounded, contiguous Park area were proposed, including developing interlinked but separate areas, extending Park operations beyond the boundary (or using a 'fuzzy' boundary) and allowing the Park extent to develop over time.

104. Responses from the renewables sector emphasised the need for very careful consideration of the boundary to ensure compliance with conditions of the Act.

Reporter conclusions on the area of the proposed National Park if Ministers decide to proceed with designation

Discussion

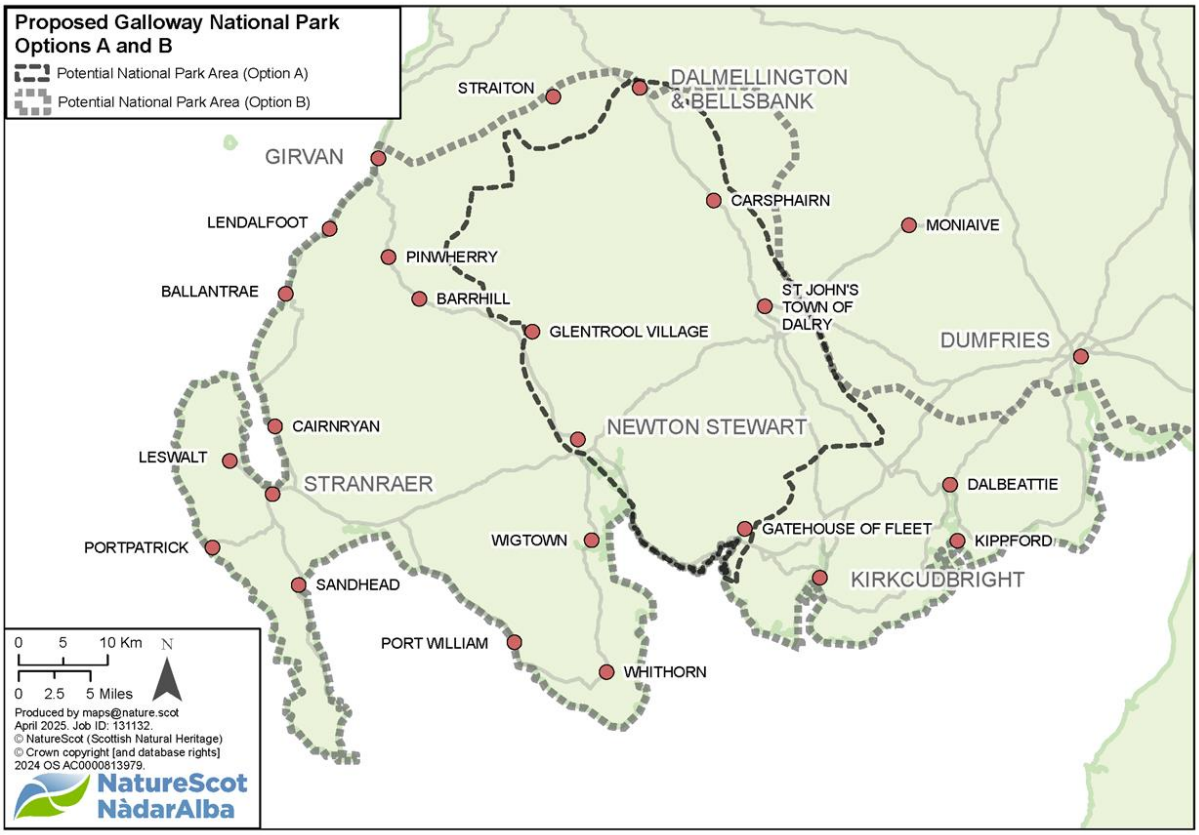
105. On the basis of the consultation, we have examined the merits of two options for the area of the National Park further: Option A - a core "Hills and Coast" area similar to but smaller than Option 1 proposed in the consultation and Option B - an extensive "Hills, Coast and Countryside" area similar to Option 3 proposed in the consultation. Indicative maps of both options are presented in ***Map 3*** and ***Map 4*** below. More information on the methodology for their selection is detailed further in Annex E together with a brief description of their indicative boundaries. At this stage, we have as Reporter discounted Option 2 on the basis that this was least popular. While including the entire coastline of the area is attractive as Option 3 recognises, drawing a meaningful inland boundary for it would be a significant challenge and raise similar issues to Option 3 considered further below.

106. Both of these area options cover all three local authority areas with details provided below. Option A is a little smaller than Loch Lomond & the Trossachs and Option B is a little smaller than the Cairngorms though with a population larger than both existing National Parks combined. It is notable that a large proportion of the area of the core Hills and Coast is in public ownership and recognised for its natural heritage value.

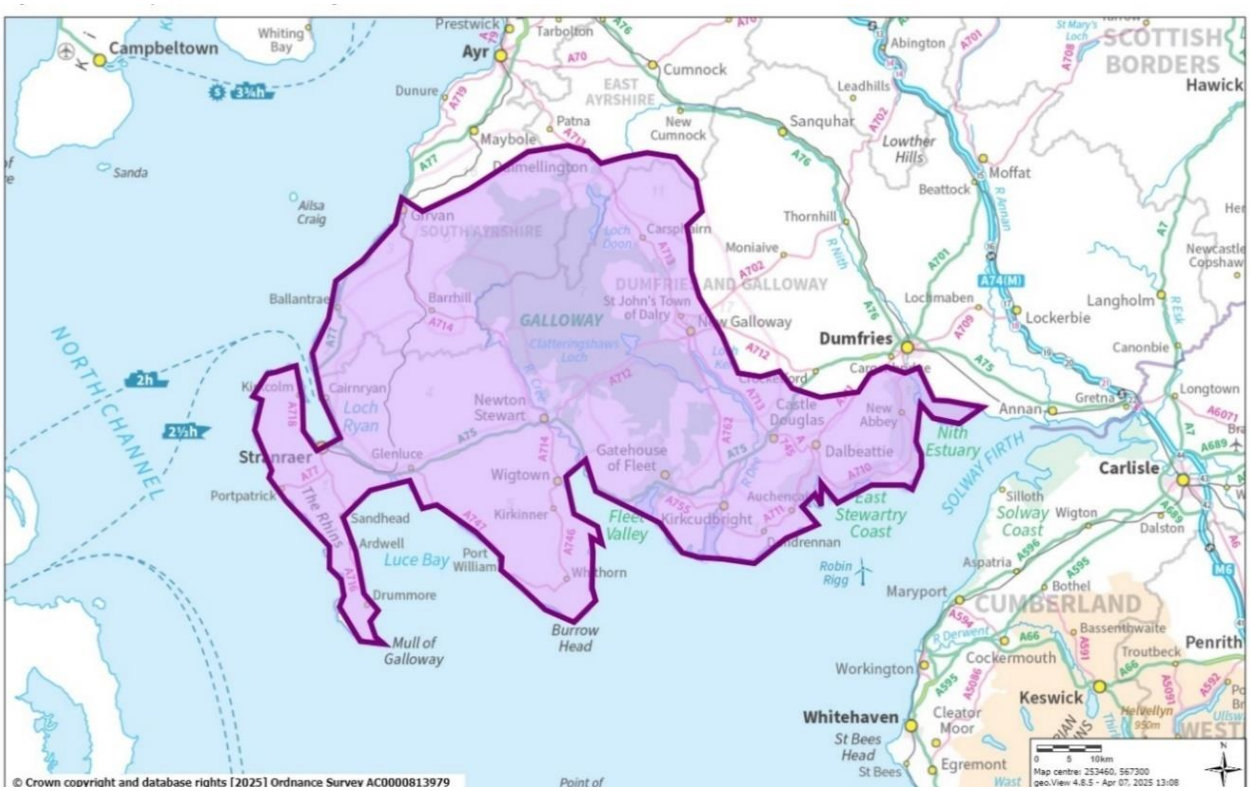
Table 12 - Area option details

Option	**Size of area (km2)**	**Area of Local Authority in the Newest NP option (km2)**		**% Designated** (SSSI, NNR, SAC, SPA, Ramsar, NSA)	**% Area Public Land**	**Population**
A - Core	1564	Dumfries and Galloway	1173	15.6%	51.5%	12,700
		South Ayrshire	264			
		East Ayrshire	120			
B - Extensive	4178	Dumfries and Galloway	3308	14%	25%	61,402
		South Ayrshire	715			
		East Ayrshire	139			

Map 3 - Option A 'Core'



Map 4 - Option B ‘Extensive’



107. As noted earlier, we have not had any comment which makes us reconsider the analysis of the proposal against the conditions of the Act that we previously presented alongside the consultation. While very different, we consider that both these area options will therefore meet the conditions of the Act for Park status, subject to detailed finalisation of their boundary.

108. The merits and drawbacks of each option are as follows.
    a) The **core “Hills and Coast” area** is of high natural or cultural heritage importance, contains a large area of public land and has the least impact on commercial farming, forestry and renewables interests across the area. Some of the communities in the area are more supportive of a National Park and consulting on this option may open up a more positive debate in nearby communities about whether they would want to be included. While the area would provide a strong focus on upland management and the transition to sustainable forestry practice, it would not include much coastline (less than half that of Loch Lomond & the Trossachs National Park). Improved provision for visitors and their management would focus on the Galloway Hills, though a wider approach would be needed to ensure pressures on its surrounding communities were also managed effectively.
    b) The **extensive “Hills, Coast and Countryside” area** includes all the significant areas of high natural or cultural heritage importance across the region, including its whole coastline. The large geographic scale of the area would bring the most benefit in terms of the potential for nature recovery and it would also spread the economic benefits of the National Park across all of the communities of the area. The inclusion of this length of coastline would provide the National Park a clear

focus for demonstrating leadership in coastal management. This scale of National Park was favoured by most of the responses which favoured a National Park, including Dumfries and Galloway Council. At the same time, it is a large and complex area for a National Park to make a difference across without a significant budget, it is unclear what difference a National Park could make to farming and forestry practice without some changes to funding and regulation and is not favoured by the farming, forestry and renewable sectors. The choice of this area would require the development of a new national wind farm policy specific to this National Park area.

Reporter Advice

109. The choice of the proposed area is guided by the three conditions of the Act, but it also needs to be informed by Scottish Government priorities and the views of communities and businesses within and surrounding the area.

110. In principle, we consider that the larger option would offer the greatest potential for nature recovery and also spreading the economic benefits arising from National Park status across all the communities of the area. But in practice we doubt whether a Park could give equal priority across such a large and complex area. Its ability to influence farming and forestry practice except through voluntary approaches is also limited. The funding required for it to make a difference would also be significant. We also appreciate the concerns being expressed about the inclusion of productive farming and forestry sectors within a National Park despite the limited evidence of impact from existing National Parks. If large areas were included, strong reassurance would be needed on the value the future National Park Authority would place on supporting these key sectors. Careful consideration would similarly be needed on renewables and particularly onshore wind farms and related grid infrastructure. While the Scottish Government has proposed to make changes to NPF4 to allow for new large-scale renewable infrastructure to be located in new National Parks, such a change may not be needed if the proposed area does not impact on future patterns of development.

111. In including the key elements of the hills and coast option we consulted on, the core option would include the area with the strongest value for its natural heritage and its contribution to the special qualities of the area; it would include communities most in favour of considering Park status further and it would have least impact on the intensive dairy farming, commercial forestry and renewable interests. Much of the area is already in the ownership of Scottish Government and its day-to-day management by Scottish Forestry would ensure that multi-purpose forestry management could be successfully embedded into the ethos of the Park.

112. **In terms of the area, we therefore propose as Reporter that the core option (Option A) is developed further if Ministers decide to proceed with developing the draft designation order.** A map of this area and its indicative boundary at 1:100,000 scale is presented in Map 3 and described further in Annex E.

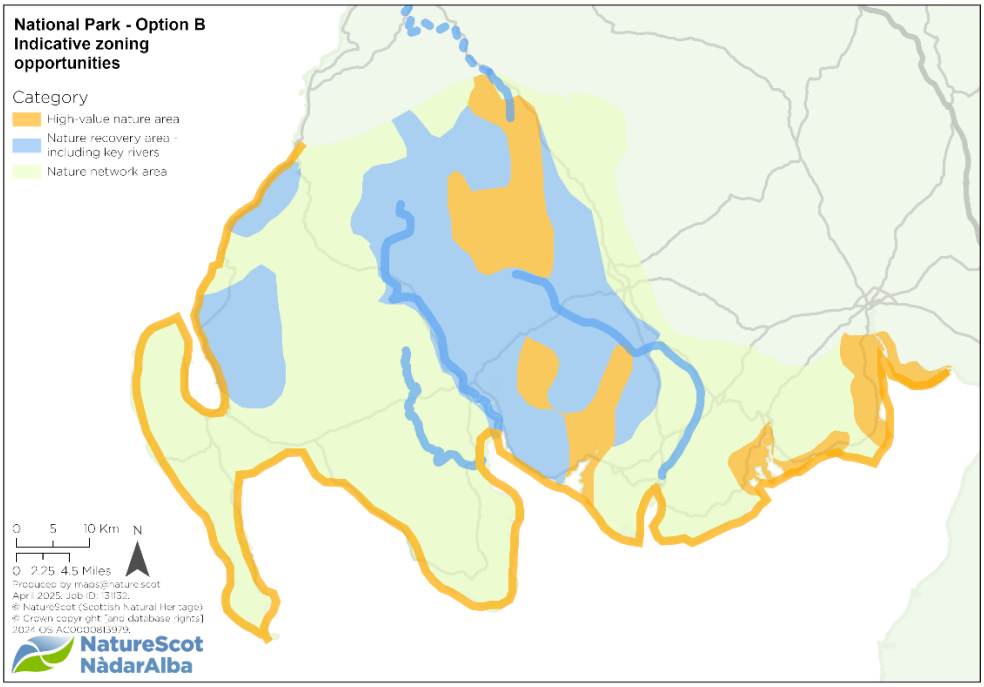
113. **We consider that such an option would also provide a clear role for the GSA Biosphere Reserve which would continue to operate across a much wider area.**

There is also a strong case for refreshing the management of the National Scenic Areas learning the lessons from the previous management strategies by Dumfries and Galloway Council.

114. At the same time, we recognise the support from those in favour of a National Park for the larger area of Option B to be considered and the positive arguments made for it in terms of the range of benefits it could bring to people and nature across the region. All three local authorities also are supportive of this largest option (though as noted earlier Dumfries and Galloway reserved their opinion on the principle of the Park itself). If Ministers favoured this option, we suggest that a zonal approach was taken to the National Park which differentiated between different areas of it in terms of their importance for nature. While building on the zonal approach established as part of the Biosphere Reserve, we do not think its threefold approach of core, buffer and transition zones should be used. Instead, we suggest the zones differentiate between:
    a) **High Value Nature areas** (amber). The parts of the National Park area of highest value and priority for nature, landscape and recreation (e.g. the Merrick wildland area, the Silver Flow European designation, Cairnsmore of Fleet NNR and the coastal zone including the three NSAs and Caerlaverock NNR);
    b) **Nature recovery areas** (blue). The parts of the National Park area with greatest potential alongside existing land-uses for nature-friendly practices and innovation (e.g. native woodland expansion, peatland restoration, grassland management and improving river ecosystem health); and
    c) **Nature Network areas**. The rest of the National Park area where potential for nature networks can be realised alongside existing land-uses.

115. While purely indicative at this stage, Map 5 illustrates how this zonal approach could be developed in practice.

Map 5 - Zonal approach



Powers and functions of the National Park Authority

116. The framework for the powers of the National Park Authority is provided by the National Parks (Scotland) Act 2000. These include:
    a) a range of general functions and powers provided by Schedule 2 of the Act;
    b) a range of countryside functions and powers provided by Schedules 3 and 5 of the Act;
    c) the town and country planning functions conferred under Section 10 of the Act; and,
    d) any additional functions and powers that are stated in the designation order, including for example the access functions and powers conferred under part 1 of the Land Reform (Scotland) 2003 Act.

117. With the exception of the National Park Partnership Plan, all the powers and functions for a National Park Authority in Schedules 2, 3 and 5 of the Act are drawn from existing legislation for local authorities and other public bodies. A summary of these general functions and powers is shown below and we sought views on whether there are other powers and functions which could be considered for this proposed National Park.

General functions and powers of a National Park Authority:

- General
- provide advice and assistance
- undertake or fund research
- give grants
- enter into contracts, accept gifts, form or promote companies and partnerships
- fix and recover charges for goods, services and facilities
- Management
- enter into management agreements and make bylaws and management rules
- establish nature reserves
- buy and manage land either by agreement or by compulsory purchase
- general arrangements for access, provision to make access orders and access agreements, acquire land etc.
- improve waterways for recreation
- protect and maintain rights of way
- request road traffic orders from the Scottish Ministers
- Services
- provide information, education services and facilities for the purpose of promoting the
- special qualities of the National Park by the public
- provide or promote leisure facilities in the National Park, and to encourage people to
- visit the National Park
- provide campsites and provide food etc in the National Park.
- provide recreational, sporting, cultural and social facilities and activities in the National Park

118. If enacted, the proposals now set out in the Natural Environment Bill will add the ability for National Park staff to issue Fixed Penalty notices in relation to National Park bylaws. They also provide for all future National Park Authorities to have access powers and functions if this is required.

Town and country planning

119. The Act provides the following options for the National Park Authority's planning function:
    a) to be the planning authority for the National Park with responsibility for both development planning and development management for its area
    b) to be treated as the planning authority for the National Park, but only in relation to development planning
    c) bespoke arrangements for the planning function that are set in the designation order.

120. In the consultation paper we set out a number of options for more bespoke arrangements for the planning function.

121. Responses to this question were mixed. Just over 40% of responses were opposed to bespoke options proposed for development planning and management and just under 40% were in favour with the remainder undecided or did not know.

122. The three local authorities were very clear in their views that the planning function should remain with them, with the National Park Authority having consultee arrangements on both the local plan and development management. Two of the three councils considered that existing local plan arrangements were sufficient and that there was no need for a separate local plan for the Park area; only one of the councils proposed referral powers to Scottish Ministers on cases where the National Park Authority objected to a proposal that the local authority was minded to support. Irrespective of who performed the function, the additional costs needed for planning services within the Park area as a result of changes to EIA regulations was also noted. Where they expressed a view, land management interests were extremely concerned over the National Park having any planning function because of the extra cost, delays and regulation they considered this to mean.

123. In contrast, some respondents, including both local and national environmental groups, argued for arrangements similar to the existing National Parks, with most in favour of the National Park being responsible for the local plan and making decisions on key proposals (akin to the Cairngorms arrangements), though some also made the case for the National Park to be a full planning authority (akin to Loch Lomond & the Trossachs arrangements).

Access, recreation and visitor management

124. Both the existing National Parks are Access Authorities and undertake this key function for their areas, including preparing a core path plan for their area, managing a local access forum, upholding access rights, providing advice to land managers and promoting the Scottish Outdoor Access Code. Given the third aim of National Parks is to promote the understanding and enjoyment of the area, we proposed that a similar role may be appropriate for the proposed Galloway National Park, though the detail of it will depend on the area which may be selected for National Park status.

125. Responses to these questions were mixed. In terms of the technical survey, nearly 46% of responses who expressed a view on this specific issue were opposed to the National Park Authority becoming the access authority for its area with nearly 41% in favour and 13% undecided or did not know. Equally, nearly 45% of responses were opposed to the National Park Authority drawing up the core path plan for its area with 37% in favour and 18% undecided or did not know. In contrast, nearly 47% of responses were supportive of the National Park Authority employing its own ranger service for its area with 40% opposed and 14% undecided or did not know.

126. The three local authorities were generally content with the National Park Authority having these functions, subject to further detailed consideration on the implications for them and other current service providers. Additional funding was also key. The scope for a Park-led access forum to provide advice beyond the Park area was suggested by Dumfries and Galloway Council. Similar supportive views were also expressed more strongly by local and national environmental and recreational groups. The need for the National Park Authority to have responsibility for rights of way as well as core paths was also suggested. When they expressed a view, land management interests were content with the current arrangements even though they also recognised a range of current access and visitor management related issues.

Forestry and onshore wind development

127. Forestry and renewable energy are important land uses which will play a major role in meeting the aims of the National Park. While the policy and regulatory framework for them is a matter for the Scottish Government and its agencies, a National Park Authority would need to work closely with these sectors in drawing up its Park Plan in ways which supported their long-term success. To help achieve this we proposed a range of consultation arrangements for the National Park Authority in relation to forest management plans prepared by Forestry and Land Scotland; regulation and funding decisions made by Scottish Forestry; and energy development proposals dealt with by the Energy Consents Unit in the Scottish Government under the Electricity Act. We also saw merit in the National Park Authority and Forestry and Land Scotland jointly producing a management plan for the Galloway Forest Park.

128. Responses to these questions were mixed. 44% of responses were opposed to the statutory consultation arrangements proposed with 44% in favour and nearly 17%

undecided or did not know. Support for these proposed arrangements were strongest from local authorities, and from local and national environmental and recreational bodies. In view of their stated opposition to the proposal, the representative bodies for forestry and renewables interests did not comment on the detailed arrangements but comments from individual forestry and renewables businesses highlighted the additional time and costs for them of slower decision making as a result of these proposals. The additional costs of forestry regulation due to the changes to EIA regulations in National Parks has also been raised in discussions with both Scottish Forestry and Forestry and Land Scotland.

Further powers and functions

129. Relatively few responses were generated by this question, with most comment on further powers and functions focused on the role of the proposed National Park in land management – for example though supporting implementation of the regional land-use framework and the new requirements for whole farm and estate plans through future agri-environment and forestry funding. As with the existing National Parks, it was expected that the National Park Authority would help facilitate place planning by communities within its area. Given its coastline, the need for it to be a consultee on marine planning was also suggested.

130. In contrast, those who opposed the principle of the National Park expressed concerns over what they saw as the unnecessary duplication of powers, increased regulation and a disconnect between the National Park Authority and local organisations and businesses. The desire to rework and innovate existing agencies was seen as more preferable than establishing a new National Park.

Reporter conclusions on powers and functions of the National Park Authority

Discussion

131. Reflecting the polarisation of views on the principle of the National Park, there is at this stage little consensus on the detailed arrangements for the powers and governance of its National Park Authority. Those more supportive of the proposed National Park either considered similar powers and functions to the existing National Park Authorities would be appropriate or sought different options which retained more of the role for existing organisations. The need for further detailed discussion was also highlighted by the three local authorities and others, with further engagement with both Scottish Forestry and Forestry and Land Scotland also essential.

132. The National Parks (Scotland) Act 2000 was designed to allow for different approaches to the National Park Authority to be explored for each area proposed as a National Park (with wider changes to the model of National Parks more generally possible for coastal and marine National Parks). The development of both the existing National Parks drew heavily on their predecessor arrangements – Loch Lomond & the Trossachs

developed from a regional park with a subject local plan and recreational management focus and the Cairngorms from a voluntary partnership of stakeholders which led to the development of the area's first non-statutory management plan. In contrast, a mix of arrangements are in place for the proposed area and it is right to consider if this suggests that a different approach to the model of National Park Authority is needed.

133. In undertaking our analysis, we have examined two options based on input received during the consultation. As the Reporter, we were particularly cognisant of the views of the local authorities who would have a key role in working with any National Park Authority.

Option A - A National Park Authority with powers and functions similar to the existing two

134. This Option might include:
    a) Development planning - A National Park Authority would have sole responsibility for the local development plan for the area.
    b) Development management - A National Park Authority would have responsibility for all or some of the development management decisions for its area.
    c) Access, recreation and visitor management - A National Park Authority would be the access authority for its area including preparing a core path plan, managing a local access forum, upholding access rights, providing advice to land managers, promoting the Scottish Outdoor Access Code and running its own ranger service. It could also have responsibility for rights of way.
    d) Forestry and renewables – A National Park Authority would be a statutory consultee for forest management plans prepared by Forestry and Land Scotland; regulation and funding decisions made by Scottish Forestry; and energy development proposals dealt with by the Energy Consents Unit.

135. This option is tried and tested and is generally seen as working well across areas which are larger than being considered here and involve more local authorities. 13 of the 15 UK National Park Authorities have full planning powers with only the Cairngorms and the South Downs National Parks being the exception though both of these are the development plan authority for their area.

Option B - A National Park Authority with powers and functions different to the existing two

136. This Option might include:
    a) Development planning - A National Park Authority would have responsibility for a bespoke (subject) local development plan for the area drawn up under S16 of the Town & Country Planning (Scotland) Act 1997 (as amended). It would also be a statutory consultee for the three local development plans prepared by the local authorities. Development planning staff from the three local authorities could be seconded to the Park Authority to prepare this subject local plan.

b) Development management - A National Park Authority would be a statutory consultee on development proposals which have significant implications for the implementation of the National Park Plan. The few cases where an objection from the National Park Authority cannot be resolved would be referred to Scottish Ministers for determination.
c) Access, recreation and visitor management - The Park would play a central role in the planning, co-ordination and investment needed for recreational and visitor management throughout its area, with a National Park advisory group established to guide detailed priorities and action and resolve operational issues. Both the National Park Authority and the local authorities would have full local access authority powers, with the detail of how these are undertaken to be agreed depending on the final decisions on the area of the National Park.
d) Forestry - The National Park Authority would work closely with Scottish Forestry and Forestry and Land Scotland on the regulation, funding and planning of forestry across the National Park area. If the larger area was selected, it could work with Forestry and Land Scotland to draw up and implement a management plan for Galloway Forest Park. If the smaller area was selected, the strategic planning of Galloway Forest Park would be subsumed into the National Park Plan with separate forest plans retained for dealing with the planning and management of the public forest estate.
e) Renewables - Development management decisions would remain with the local planning authorities and the Energy Consents Unit. The Park Authority would be a statutory consultee on proposals and work closely with renewable companies to shape their investment plans on nature restoration for community benefit within its area.

137. This option is innovative, more specially tailored to integrate with the existing arrangements for the area and would seem to reflect the ambitions of the local authorities. It is also more in keeping with public sector reform with the additional budget required because of National Park status going into collaboration and strengthening existing services. Care would be needed in finalising the approach to ensure that the international recognition of Scotland's National Parks by IUCN was maintained. To provide a common brand for the National Park, consideration would be needed to be given to how the potential range of ranger and other visitor management services were branded within Park. This would have parallels with differentiation between the branding of the Cairngorms National Park which is separate to the branding for the Cairngorms National Park Authority.

Reporter Advice

138. The National Parks (Scotland) Act 2000 provides a common framework for all National Parks designated in Scotland. Whatever arrangements are put in place for the additional functions and powers of this National Park Authority, it will be important that they are as simple as possible, add value to the operation of the functions and powers of existing public bodies and focus on the issues that matter to this National Park area. Good working relationships between the new National Park Authority, the

local authorities, Forestry and Land Scotland and other national and local organisations will also be critical.

139. Provided the national policy and regulatory framework for National Parks remains the same across Scotland, different models for the operation of their National Park Authorities can be developed. While it is important that it retains the key characteristics of the existing National Park Authorities to ensure the international recognition of Scotland's National Parks by IUCN is maintained, further deliberation on the detail of the powers and functions for this National Park Authority could be merited to test whether Option B is appropriate in full or in part. If alternative approaches are progressed, we suggest that a review of the success or otherwise of these new arrangements should be made after the first 10 years of the new Park's operation.

140. We note that the changes proposed in the Natural Environment Bill, if passed into law as drafted, would further strengthen the duties of public bodies including local authorities to have regard to National Park aims and to further the implementation of the Park Plan. We think this change would provide some safeguard to support elements of Option B.

141. Section 17 on agency arrangements and joint operations of the existing National Parks (Scotland) 2000 legislation also allows for functions to be transferred between the National Park Authority and other public bodies and vice versa. One approach might be to give the planning and access powers to the new National Park Authority which are similar to existing National Parks and for it to then delegate them back to the local authority to undertake on its behalf. Changes could then be made if required once experience of these arrangements in practice has been gained. Such an approach was tested in the development of the planning arrangements for the South Downs National Park.

142. The contribution of land management to the special qualities of this National Park is significant and the National Park Authority would need to develop a positive partnership between it and the farming and forestry sectors. Given the concern raised by land managers around the perceived disbenefits of operating within a National Park, we suggest that the scoring of new agri-environment and forestry arrangements should give greater weight to applications to land managers within National Parks. This was the case previously for considering access funding in the previous Scottish Rural Development Plan and would bring Scotland in line with funding schemes operating in National Parks across the rest of the UK.

Governance and staffing

Size and make-up of the Board of the National Park Authority

143. The Board of the National Park Authority is the decision-making body of the National Park and is directly accountable to Scottish Ministers for its actions. The framework for representation on the National Park Board is provided by the National Parks (Scotland) Act 2000. This framework:
    a) sets the maximum size of the National Park Board as 25 (although to date, it has always been smaller than this in the existing Scottish National Parks);
    b) provides for a minimum of 20% of the National Park Board to be directly elected by those living in the National Park area;
    c) provides for Scottish Ministers to appoint 50% of the other members and for local authorities to nominate the remaining 50%; and,
    d) ensures that a minimum of 60% of the Board's members are likely to be 'local' (defined as either people who live in the National Park area, or who are a councillor for an electoral ward or community council any part of which is in the park area).

144. The approach requires at least one representative from each local authority within the National Park area. For the existing Scottish National Parks, some of the electoral wards for directly elected members extend over more than one local authority area.

145. The size and population geography of the area has important implications for the number of directly elected members and the share of local authority nominations. This in turn has implications for the size of the National Park Board. While further detailed work will be needed to calculate the precise populations for the preferred area of the proposed National Park, we proposed two scenarios in the consultation as shown in ***Figure 2*** below.

146. Both these options mean that two thirds of the Board's membership would be likely to consist of local representatives (depending on who the local authority decides to nominate), with one third of members directly elected by local people living in the National Park area.

147. Overall, approximately 40% of respondents to the three surveys do not support either of these options with around 31% supportive and 17% either unsure or did not know. A further 12% offered no answer. The tendency to reject these proposals was strongest in the technical survey at 48% of all responses. The main reasons for objecting to these proposals were the need for more local representation and/or fewer appointments from outside the area by Scottish Ministers. It may also be that people objected to these proposals as part of their opposition to the principle of the

National Park – the overwhelming majority of those who objected to the Board options strongly opposed the proposal itself.

Figure 2 - Park Authority Board scenarios (from consultation)

148. Responses from both people and organisations who supported the possible options and those who opposed them all, agreed that local representation should allow for the final decisions of the Board to be determined locally. The responses from supporters of the principle of the Park note the importance and value of national appointments bringing different expertise and perspective to the Board. They also emphasised that a national voice was important given the longer-term funding for the National Park by Scottish Government.

149. There were also comments about how each local authority should be represented and in what quantity with South Ayrshire Council seeking greater representation. Dumfries and Galloway Council noted the need for the Board to be made up of appropriate numbers of local members to reflect both local accountability from directly elected members and local representation via the local authority which would continue to provide key services in the National Park area and also represent communities of place and interest outside it. Like others, they also suggested the need to increase local membership and support through reducing the number of direct appointments made by the Scottish Government or by ensuring that those appointed lived or worked locally.

150. Calls for a smaller Board were more common than those for a larger Board, especially among opponents of the proposal. Strong views were expressed in the responses and there was evidence of potential confusion on what the proposals meant in practice, including on the role, independence and renumeration of Board members. Many of the suggested Board compositions would also contravene the National Parks Act framework.

Reporter conclusions on size and make-up of the Board of the National Park Authority

Discussion

151. The framework provided in the legislation provides a balance between community, local authority and national interests which are all seen as essential for the effective governance of the National Park.

152. Both local accountability and representation is provided by directly elected members and local authority appointments who make up the majority of members of the Board. We consulted on two options that would both increase the share of directly elected members compared to the existing National Parks. Increasing this share further while maintaining reasonable balance of representation from local authority nominations would increase the size of the Board significantly. This does not seem proportionate or cost effective particularly if the powers and functions of the National Park are different from the existing ones.

153. The experience from the existing National Parks and other regional public bodies such as SOSE shows that national appointments can bring valuable expertise, experience and perspectives to a Board. In the case of the existing two National Parks, Ministers seek to appoint national appointments with either subject or geographic knowledge or both, and as a result they often appoint people who live and work in the area, as shown in the Cairngorms where at times up to 80% of the National Park Board have been made up of people who live and work in the area. There is possibly scope for further public sector alignment if the national appointment process for the National Park Board considered appointing members already on the boards of existing public bodies such as SOSE; SEPA, NatureScot or the existing National Parks. Care would be needed to reduce any real or perceived conflicts of interest that could arise.

Reporter Advice

154. While recognising the strength of arguments made on this issue, we consider it should be possible to find a way forward within the existing legislative framework that balances the calls for strong local representation with the value of national input. During the draft designation order phase of work, it would be important to increase awareness, understanding and discussion of the possible Board arrangements, for

example by sharing more information on the lived experience of being on one of the Boards of one of the existing National Parks.

155. Further work to finalise the size and make-up of the Park Board would be needed once final decisions on the area of the Park were made. If the core "Hills and Coast area" was selected then we consider that a Board of 12 members or fewer would be appropriate given the likely population of the area. If the extensive area were chosen then a Board of at least 15 members or more would be required depending on the detailed arrangements for powers and functions of the National Park Authority.

156. Given the concerns raised locally, we would strongly recommend that Scottish Ministers look to appoint people with relevant knowledge of the area or who live and work in the area. The scope to draw these appointments from the Boards of existing public bodies operating in this part of Scotland could also be explored further.

Areas of expertise required by the National Park Board

157. The majority of survey respondents agreed with the proposal for the Board to have expertise in nature, farming and forestry, though responses to the technical survey produced a more mixed picture.

158. A long list of other areas of expertise were also suggested including climate change and sustainability; land use and planning; community and rural development; biodiversity and conservation; renewable energy and green infrastructure; legal and regulatory affairs; economic and financial management; public health and wellbeing; access, recreation and tourism; technology and innovation; cultural and heritage preservation; and marine conservation. The need to involve young people on the Board was also noted.

159. A long list of suggestions for National Park sub-committees and advisory groups was also generated by the responses.

Reporter conclusions on areas of expertise required by the National Park Board

Discussion

160. While there is strong support for including expertise on nature, farming and forestry on the Board of the National Park, there are also a wide range of other suggestions made. This illustrates the challenge for a Park Board more generally given their very wide-ranging remit. Similar challenges would be experienced by the National Park Authority when it begins to scope its structure of sub-groups and advisory fora.

161. As well as relevant expertise of national appointments, experience of governance on Boards and similar governance arrangements would clearly be useful. For all

prospective candidates, the personal and leadership qualities they bring to the Board are equally important.

Reporter Advice

162. It would be important that appointments to the Board demonstrate the importance that the new National Park Authority would place on nature, farming and forestry. While the two often go hand in hand, this is as much about representation as expertise. The latter could readily sit at staff level in the National Park Authority or other bodies. The track record of the existing National Parks suggests that this representation can be achieved in practice through putting this into the designation order for this National Park. This may be needed given the significance of productive farming and forestry interests in this area. These topics are likely to be relevant whatever area is selected but particularly so for the extensive option.

Timing of direct elections

163. Of the relatively few responses to this question, the leading proposal was that members should be directly elected before placing appointees, with a smaller number of responses suggesting that elections should happen after appointees are publicised. Others suggested that elections should take place at the same time as local or national elections, or else at the same time as the other two National Parks.

Reporter conclusions on timing of direct elections

Discussion

164. This is quite a technical question compared to the others with little substantial comment generated from it.

Reporter Advice

165. We recommend that the results of direct elections to the Park Board are made prior to local authority nominations and Ministerial appointments. To make this work in practice would require careful planning and also a suitable timescale between designation of the National Park by the Scottish Parliament and its legal establishment date.

Staffing arrangements

166. Schedule 1 (13) of the Act requires a CEO to be appointed but leaves open what other staffing arrangements are put in place. This part of the consultation sought views on the level of staffing required by the National Park Authority itself and the scope for using existing public bodies to deliver National Park functions.

167. Many responses to this question reflected on the need for more detail on the area and powers and functions of the National Park Authority before this could be considered further. Local authorities and other public bodies with responsibility for regulation also emphasised the need for additional staff resourcing for them to deliver the

additional requirements which come with National Park status. The challenge of recruiting suitably qualified and experienced staff, particularly but not exclusively to professional roles in areas such as planning, legal and finance with the need to avoid organisations competing for these roles was noted.

168. Those in support of the proposal felt sharing corporate functions with the public sector in general may work along with a National Park perhaps giving funding to existing agencies and other voluntary and business organisations to help with the work of a National Park. The importance of integrating the work and staffing of the GSA Biosphere Reserve was also highlighted, along with creating jobs for local people and businesses.

169. There was little commentary on the level of staffing required with equal numbers commenting that the suggested 25 was too few or too many depending on the model of National Park Authority adopted and its powers and functions. It was noted that a significantly larger staff resource would be needed if the Park Authority had direct responsibility for access, recreation and visitor management. There was recognition that a National Park Authority's role in liaising, collaborating and joint working with many diverse agencies would need sufficient staffing to produce a more focused approach.

170. There were a range of comments raised by those opposed as to why existing agencies could not be properly funded to achieve the aims of a National Park without the designation. Calls were also made for additional resourcing for staffing in key services which could be placed under greater pressure by National Park designation such as health, mountain and sea rescue, and the police.

Reporter conclusions on staffing arrangements

Discussion

171. As many responses have identified, this is a difficult question to respond to in detail without knowing what either the area of the National Park might be or the powers and functions of the National Park Authority. Nevertheless, there appears to be an appetite for a different approach to this Park Authority that is more in keeping with the public sector reform agenda and the need to make public funds go further.

Reporter Advice

172. The Scottish Government is placing greater priority on public sector reform and a range of proposals is being developed to take this forward. Reducing duplication, increasing efficiency and sharing resources between public bodies makes sense in terms of making public funding go further, but it also adds value in terms of delivering better outcomes locally. As a place-based approach to public sector delivery, National Parks would seem to be well-placed to contribute to this agenda and should be at the forefront of new thinking if the designation of this National Park was progressed.

173. Further detailed consideration will be needed on the scope to achieve these ambitions with the designation of this National Park. Greatest potential to deliver public sector reform is most likely if the powers and functions are retained by existing bodies with the National Park Authority instead focusing on strategic planning, co-ordination of activity and making partnerships work effectively. If the approach taken is more similar to the existing two National Parks, there may still be scope for sharing corporate functions with the existing National Park bodies as well as offices and equipment with Forestry and Land Scotland or other relevant public bodies operating in the area. With three National Parks, a single National Park agency or service could also become a more viable option to consider provided the existing governance arrangements for each National Park were safeguarded.

Key steps to ensure a new National Park operates in ways which are inclusive of ethnic minorities and other protected characteristics

174. Responses to this question were mixed, though there was general recognition from most respondents that the National Park should give positive encouragement to under-represented groups as well as proactively engage and consult with community organisations. A higher proportion of those opposed to the National Park felt the existing approach and protections were fine and that no further steps were needed to ensure inclusivity of ethnic minorities and people with protected characteristics.

175. The need for Board membership and staffing of the National Park Authority to include equality, diversity and inclusion expertise was noted together with the need for a Park Authority to proactively engage with a range of Disabled People's Organisations and Access Panels and protected characteristic groups. Some suggested that at future stages of National Park development, the following aspects of accessibility and inclusion for disabled people would need to carefully considered: pathways, seating, buildings, toilets, transport, information and signage.

Reporter conclusions on inclusion of ethnic minorities and other protected characteristics

Discussion

176. This was an area of general consensus with a range of positive ideas and suggestions made for what measures could be put in place to ensure that a new National Park Authority complied with and demonstrated good practice on the equality duties placed on all public bodies.

Reporter Advice

177. This is an important issue for a National Park Authority to get right and there is considerable experience from the existing two National Parks to draw on in this area, including the Board membership, staff expertise and the establishment of advisory groups as such as the Cairngorms for all forum.

178. Further consideration should be given to how underrepresented groups can contribute to the next stages of the development of the proposed National Park,

building on the work NatureScot has undertaken as Reporter. This should include closer working with the existing groups and structures established by the three local authorities. A shadow Park for all group could also be considered as part of the transition arrangements.

Name of the National Park

179. Less than 20% of all survey respondents agreed with the proposed name, "Kingdom of Galloway National Park". Many responses questioned the rationale behind the inclusion of "Kingdom". By far the most common alternative suggestion was "Galloway National Park", though calls were also made for a name such as "Galloway and Carrick Forest", "Galloway and Southern Ayrshire" or "Galloway and Ayrshire National Park" which Ayrshire communities could more readily relate to. Many supporters of longer, more geographically descriptive names acknowledged the likelihood of these being shortened to "Galloway National Park" in common usage. VisitScotland also noted the need to market test the name with potential visitors to it.

Reporter conclusions on the name of the National Park

Discussion

180. The name of the National Park is important for many reasons, and particularly for allowing both local communities to identify with it and for potential visitors to be attracted to visiting it. For these reasons, the best choice of name can only be finalised when the extent of the National Park has been decided.

Reporter Advice

181. For now, we suggest the following names should be considered further depending on the area option selected:
    a) Core - Option A - Galloway and Ayrshire Hills National Park
    b) Extensive - Option B - Galloway and Ayrshire National Park.

182. The revised name should also be tested again as part of any further consultation. VisitScotland and the South of Scotland Destination Alliance should be consulted further on the branding implications.

Other issues and sources of evidence to inform further assessment

183. There were a huge range of topics highlighted in response to this section, though there was very little said which had not been stated in response to earlier questions. Very few additional sources of evidence were cited – exceptions included the GSA Biosphere State of the Biosphere 2012-2022 report and the review of the economic and climate implications of the proposed National Park by Scottish Renewables. The need for a more detailed Health Impact Assessment building on the one prepared by NHS Ayrshire and Arran was noted.

184. Those opposed to the proposal expressed concern over the costs involved in a National Park, the lack of funding for infrastructure and services and a dissatisfaction in the consultation itself, including the lack of a referendum. Many also stated their view that a National Park would not create sustainable jobs but would result in greater bureaucracy.

185. In contrast, those in favour reiterated their support for the establishment of a new National Park. A significant number see the opportunity to have a new National Park model as well as the chance for the Park to work closely with other organisations, as well as the positive economic impacts a National Park would bring and the opportunity to influence policy in the area

Annex A - Requirement for NatureScot to act as the reporter

National Park in Galloway: proposal by Scottish Ministers- Annex A

Introduction

1. The Scottish Ministers have decided, in relation to this National Park proposal, to proceed under section 3 of the National Parks (Scotland) Act 2000 ("the 2000 Act"), requiring NatureScot to consider the proposal, undertake a process of consultation and report to them on it in accordance with the provisions in section 3 of the 2000 Act.

Legislative background

2. Section 3(1) of the 2000 Act empowers the Scottish Ministers to require the reporter to consider the proposal and report to them, by a date as may be specified, on the matters which are set out in Section 3(2) of the Act.

3. Section 3(5) of the 2000 Act requires the reporter, on receipt of the National Park proposal, to:

   a) send a copy of it, together with a copy of this requirement, to every local authority any part of whose area is within the area to which the proposal relates,
   b) determine the period (which must be at least 12 weeks) for which the proposal is to be made available for public inspection and notify every such authority of that period,
   c) publicise the proposal in such manner as the reporter thinks fit, and
   d) consult on the proposal.

4. The 2000 Act requires the reporter to consult:

   i. every local authority any part of whose area is within the area to which the proposal relates,
   ii. every community council any part of whose area is within the area to which the proposal relates,
   iii. such persons as appear to the reporter to be representative of the interests of those who live, work or carry on business in the area to which the proposal relates, and
   iv. such other persons as the reporter thinks fit.

Requirement

5. In relation to the proposal for a National Park in Galloway, NatureScot is required to consider the proposal, take forward the consultation process and report to Scottish

Ministers in accordance with the provisions in section 3 of the 2000 Act. NatureScot must provide its report to Scottish Ministers by 28 April 2025.

6. The consultation should be participatory and should ensure that people living and working in the area have an opportunity to discuss the issues, consider the content of the proposal including the desirability of a National Park in the area and suggest any alternatives. In addition to consulting local authorities, community councils, businesses, landowners, land managers and interest groups, the reporter should ensure that agencies and public bodies representative of relevant interests are consulted and their views are reported. These should include representatives of the social, economic and environmental interests of the proposed National Park.

7. As set out in Section 3(2) of the 2000 Act, NatureScot is required to consider and report to Scottish Ministers on the following matters:

   a) the area which it is proposed should be designated as a National Park;
   b) the desirability of designating the area in question (with or without modifications) as a National Park;
   c) the functions which it is proposed the National Park authority for the Park should exercise; and
   d) such other matters relating to the proposal as the requirement may specify.

8. As provided for by (d) above, the Scottish Ministers require NatureScot to consider and report on the below matters:

   a) the proposed name of the National Park;
   b) who the major stakeholders and interest groups are and how they have been engaged and consulted;
   c) an analysis of the balance of opinion on the matters considered, including specific reference to the views expressed by local communities and businesses (including those representing agriculture and forestry interests) and by bodies and agencies representative of interests which fall outside NatureScot's main remit;
   d) proposed governance arrangements for the National Park authority including: the proposed size of the authority; the proposed number of elected members; the proposed number of members appointed by Ministers (including those to be nominated by the local authority/local authorities in the area); the proposed date of election to the board; and any particular expertise, knowledge and skillset that should be represented on the board;
   e) an assessment of whether the conditions in section 2(2) of the 2000 Act are satisfied in relation to the area that has been proposed as a National Park.
   f) consideration of the preparatory work and public consultation that was undertaken during the development of the nomination for Galloway to become a National Park and relevant findings within the appraisal report.
   g) options for a new National Park authority in Galloway to be cost efficient, contribute to Scotland's public sector reform agenda and provide value for money for Scotland as a whole, for example, through shared functions and

services with other public bodies and organisations in the South of Scotland and with the existing two National Park authorities; and

h) recommendations for the development of any transitional arrangements in the area prior to designation as a National Park.

9. In line with paragraph 4 of Schedule 1 to the 2000 Act, the arrangements under which the direct election of members to a National Park authority in Galloway are conducted will not form part of the reporter investigation, they would be set out in an Elections Order.

Directions for consultation

10. In line with the requirement set out above, the following directions on how the consultation is to be carried out are issued by Scottish Ministers to NatureScot under Section 3(6) of the National Parks (2000) Act Scotland:

- Within one month of receipt of this requirement, NatureScot should publish a plan for how it will take forward the reporter investigation, including an outline of the consultation that is required and the communities, organisations, businesses and interest groups it will seek to engage with.
- Every relevant local authority and community council must be engaged and consulted in line with the requirements in Section 3(5) of the 2000 Act.
- Non-executive departmental public bodies and Scottish Government agencies that represent interests relevant to this National Park proposal must be engaged and consulted, and their views reported. These must include those representative of the social, economic and environmental interests of the proposed Park area.
- Consultation should be inclusive, participatory and equality-focused, ensuring proactive engagement with those with protected characteristics including ethnicity, age, disability and intersectionality. Public consultation and engagement should include organising and publicising meetings and events with local communities, interest groups, businesses and landowners and managers, using a variety of formats and approaches.
- The preparatory work and public consultation that was undertaken during the development of the nomination for Galloway to become a National Park and relevant findings within the appraisal report should be described in the public consultation which takes place during the reporter investigation, so that consultees can see how this previous work has informed the content of the proposal.
- Record, document and take into account the views expressed by consultees when preparing the report to Scottish Ministers.
- Ensure that any views which are those of NatureScot as statutory adviser on natural heritage matters are kept clear and distinct.

Scottish Government
22 July 2024

Annex B - List of accompanying reports

Overview
1. Method statement
Findings from the surveys
2(a) - Analysis methodology
2(b) - Technical consultation
2(c) - Summary consultation – online
2(d) - Summary consultation – paper
2(e) - Freeform responses
Findings from the consultation events and surgeries
3(a) - An overview report by Outside the Box on all the consultation events
3(b) - Overview reports by Outside the Box of the six consultation hubs: Dalmellington & Bellsbank, Dumfries, Girvan, Kirkcudbright, Newton Steward, Stranraer
3(c) - An overview report on the four drop-in surgeries
Bespoke engagement
4 (a) - A report on the bespoke engagement with young people
4 (b) - A report on the bespoke engagement with Equality Diversity and Inclusion groups
Correspondence received
5 (a) An overview of correspondence received via the online community information hub
5 (b) An overview of correspondence received via the Reporter email inbox
5 (c) An overview of correspondence received as FoI/EIR requests
Other
6 - An independent review by Scottish Community Development Centre of the engagement and consultation work undertaken
7 - New National Parks - Supporting Nominating Groups- A report by Lateral North

Annex C - Breakdown of responses from business and organisations

1) Business

There was a total of 394 participants across the three surveys who submitted business responses (9 of whom submitted business responses to more than one survey). Of this total, 296 provided a business name. In line with our overall approach to the surveys, we have not sought to confirm the business credentials of any of the responses.

Categories of businesses that responded included forestry, land management, individual estates and farms, renewable energy, transport, tourism and retail.

The 296 named businesses that responded are as follows:

A & J Wright
A & T GRIERSON FARMING
A Croskell Ltd
A D Livingston and sons
A Lindsay & Co
A.M.Dunlop & son.
Abseline LLP
AD&M Craig
Ailsa Black
Aird Donald Caravan Park
Airds Bay Beach House
Airds Estate
Albannach Guided Tours
Albert Street Barbers
Alex Paton and son
Alistair Hamilton Photography
All clear pest control stranraer ltd
allan wright photographic
Annie's Art House
APC Lines Distribution Services Ltd.
Arbigland Farms and Estate
Arbigland House and Gardens
Ardwell Estates
Auchencairn Garage
Auchengool House, Alan Mellor
Auchlane Farming Company limited
Autolink UK Limited
AW Virtual Assistant
B Marshall motor engineer
Barmurrie
Barr holiday let
Barvernochan Farming Co
Barwhillanty estate
Belted Galloway Visitor Centre
BM Electrical
Brass Tacks Upholstery services
Brewery house
Brunston Clubhouse
C & D Auction Mart, Dumfries & farmer
C McFadzean
C&D McMicking
Caerlaverock Estate LLP
Café Rendezvous
Café The Buck - Straiton
Cairndoon Farm Whithorn Newton Stewart
Callander
Callymains farming Ltd
Canines & Friends
Caravan and Motorhome Club
Cardoness Estate
Carmac property
Carol Anderson Landscape Associates
Carr
Carrick Primestock
Cavens
Cerddoriaeth Fynyddig
CL faber trust
Clan Canines
Colwidhen Asset Management
Corsewall Estate, Estate Office
Corwar Darksky Glamping
Cosy Retreat
Courtyard cottages
Craichlaw Estate
Craigenholly Farm
Craighlaw's Arms Hotel
Craiglemine Farming Co
Craigley Farms ltd
Craigmount Bed and Breakfast
Craignarget Cottage - Self Catering Accomodation
Crochmore Holdings Ltd
Cubbox Farm, Balmaclellan
Cullinaw Farm
CWP Energy

Czernin Kinsky Scottish Company Ltd
Dalbeattie Wood
Dark Sky Dome
Deeside Marine Ltd
Derek Henderson
Donnan Construction Ltd.
Dourie Farming.Co. Ltd.
Dunskey Estate
Dunskey Guest House
DWL McCutcheon & son
E Power Ltd
EbaMed Ltd
EGGER
Elrig eggs ltd
Eriff
Erminea Ltd
Ernespie Hotel
Euroforest LTD
Evans Rural Architecture
Finlas Fishing Club
Finlay's Farm Ltd
FIRTH FARMING LTD
Five Kingdoms Brewery
Forrest Estate
G M Thomson & Co
G McCornick & Co
Galloway Activity Centre
Galloway Angling Centre
Galloway Arts
Galloway Cycling Holidays
Galloway Deer Management
Galloway Drainage Supplies
Galloway Farmhouse Cheese
Galloway Lodge
Gatehouse store
Gelston Castle Holidays, GC Farms, GC Estate, etc.
Gelston Picture Frames
GJ and C Vance
Glamp in a garden
Gledpark
Glenlair home farm
Glentrool Camping & Caravan Site
Glenview Woodland Services
gmhire
Grange Associates
Greenlaw Farms
GS Mcclymont
H & A Kelly
H & RM McLellan
H M Paton & Co
H M taylor
Hamilton Farm Killumpha
Harbourlights Guesthouse
Hayton Coulthard transport Ltd
Hensol Estate Holidays
High Drumlamford Forest Lodges
High Kirkland Holidays
HM Galloway & son
Holiday House at 22
Home Hearing Care
I J Clark
I W Taylor Ltd
I&f donald
I&J Donnan
IKM Farming
Invergarven Press
J & J McConchie Ltd
J & J P McMiken
J and R Green
J b roan & son
J H &A Metcalfe and son
J Nicholson & Sons
J S ross
J&A Dunlop
J&A Hannah
J&B Print Ltd.
J&J Strain
J+M Thomson
Jackie Newbold
James Blackwood
James Kingan & Sons Ltd
James S Vance and sons
James Shennan + sons
John Clegg Consulting
John Halliday & Sons
John Melville and Sons
John Spence +Sons
Julian Watson Consultancy
Just Breathe o2
KBT STORAGE
Killantringan Lodge
Kippford Lodges
Kirkgunzeon Canines
Kirkland farm
Kirranrae Farm/Scar Park Aire
Kymms Cotton Patch
Laggan Outdoor
Lakeview guest house
Land Energy
Laura Boswell Printmaker
Laurie Arms
Lindean Guest House
Little glengyre farm holiday let
Littlelochansfarmers
Loch Doon Ranger Service
Lowland Private Hire
Lusi Alderslowe (self-employed)
M&HD Currie
Mansefield Rooms
Mark Hill Farms Ltd
Marshall
Masonic Arms
Maxwell
McGill and Patrick
Mck forestry ltd
Meadowhead Estates co
Messes Atkinson
Messrs Wallace
MH & JR Weir
Mid Nithsdale Red Squirrels Group CIC
Minuntion and Pinclanty Farms
Moorburn industries ltd

Morris Architecture
Natural Power Consultants Ltd
Norrie Toch Studios Ltd
North Bay innovations Limited
Orroland Holiday Cottages
Peel House Bed and Breakfast
Penninghame
Peter F Vance and Company
Port Logan Lodge Holiday Lets
Portling Farm
Primrose Cottage self catering
Progressive Animal Services Ltd
Quarter farm
R & J McMaster
R and J jardine
R H Gladstone & Co
R L Milligan&Son
R McClelland & Sons
R&EVance
R&S Archibald
R.T Lawson
R+J Jardine
RC Shearlaw & Son
Reid Country Retreats
Renewable Energy Systems Ltd
Rhubarb
Rickwood House Guest House
Roadhouse Blues Ltd
Rock Lea
RVCM Agri
S Smyth & son
Sarah's Magic mopps
Scar Park Aire
Scotia Seaplanes Ltd
Scotlay Free Range Egg Co
Scottish and Southern (SSER)
Scottish Woodlands Ltd
ScottishPower Renewables
Scran-tastic
Scroggiehill Farming
Seudraidh ltd
Shellknowe Garage
Silver Lodge Scotland
Simpson Farms Ltd
Solway Firth Firearms
Solway Tours
Solway View Holidays
Southerness holiday lets
Southwick Farms
St Marys Isle Estate
Stair Estates
Stena Line
Stranraer Farm Services
T B Hutchison
T C McCreath & Co
T MCKINBEL
T Millar and son
T Wright - Gribdae Farm
Talisker Bay International Limited
The Angel coffee house
The Bookshop Band
The Break Pad
The Bridge Wellness Centre
The Coo Palace
The Cross Keys hotel
The Doune of Rothiemurchus
The Earth's Crust Bakery
The Fan Engine House
The Firm of John B Barrowman
The Gallery at Laurieston
The Iron Brew
The Nail Factory (art gallery)
The Old Bank Bookshop
The Olive Retreat
The Swallow Theatre
The Waterhouse
The Wooden Stall
Tig Cottage Holiday Home
Tina Marshall Consultancy Ltd.
toc-tic-toc
Torr Organic Dairy
Tourest information
Twynholm Traction Services
Vattenfall
Viking Grazers
Vip brows
W A Birse
W N Collins
W R Wilson & Sons
W Ramsay & Sons
W&H McWhirter
W. Cruickshanks &Co
Wadsworth Farming Ltd
Walkerhill Farm
Whiskybroker
William Kilpatrick
William Lindsay Butchers
Wm law cycles
WR Wilson and sons
Yellow Door Holidays

2) Organisations, groups and elected representatives

Community councils and trusts

Belmont & Kincaidston Community Council, Borgue Community Council, Carsphairn Community Council, Corsock & Kirkpatrick Durham Community Council, Cree Valley Community Council, Gatehouse of Fleet Community Council, Loch Doon Association (7)

Local authorities

Dumfries and Galloway Council, East Ayrshire Council, South Ayrshire Council (3)

MSP/MPs/Councillors

Finlay Carson MSP; Oliver Mundell MSP; Colin Smyth MSP, Pauline Drysdale - Dumfries and Galloway Ward Councillor for Castle Douglas and Crocketford, Morag Paterson - St Johns Town of Dalry Community Councillor; Susie Ross - Balmaghie Community Councillor; David Spruce - Cree Valley Community Councillor; Edwin Cooper - New Abbey Community Councillor (8)

National Public Bodies

Bord Na Gaidhlig, Crown Estate Scotland, Historic Environment Scotland, Ministry of Defence, Network Rail, Visit Scotland (6)

Regional / Local public bodies

Galloway & Southern Ayrshire Biosphere Reserve, NHS Ayrshire & Arran, NHS Dumfries & Galloway, South of Scotland Enterprise (4)

Land management sector groups

CONFOR (Confederation of Forest Industries), Dalbeattie Forest Community Partnership, Forest Policy Group, NFU Scotland, Scottish Land & Estates, Scottish Land & Estates – Dumfries & Galloway Region, Southwest Scotland Regenerative Farming Network (7)

Marine management sector groups

Blue Marine Foundation, Galloway Static Gear Fishermen's Association, Regional Inshore Fisheries Trust (3)

Natural and cultural heritage sector groups

Ayrshire Rivers Trust, Butterfly Conservation, Bellsbank Woodland Project, Crichton Carbon Centre, Dumfriesshire and Galloway Natural History and Antiquarian Society, Galloway Conservation Society, Galloway Fisheries Trust, Galloway National Park Association, Galloway Wildlife Conservation Trust, Kirkcudbright Galleries, John Muir Trust, Loch Awe National Park, National Trust for Scotland, RSPB, Scottish Environment LINK, Scottish Wildlife Trust, Scottish Analytical Services for Art & Archaeology, Save Kingsmeadows, Scottish Campaign for National Parks / Association for the Protection of Rural Scotland, Shambellie House Trust, Southern Uplands Partnership, Wildfowl & Wetlands Trust (22)

Recreation and sporting sector groups

British Horse Society, Cycling UK in Scotland, KM (Kirkpatrick Macmillan) Cycle Rally; Paths for All, Royal Yachting Association Scotland, RSAC Motorsport Ltd, Scot Ways, Scottish Ramblers (8)

Social and economic sector groups

Scottish Renewables, Southwest Scotland Transport Alliance, Strathclyde Partnership for Transport (3)

Professional bodies

Landscape Institute Scotland, Scottish Countryside Rangers' Association (2)

Research / Academia / Academics

James Hutton Institute (1)

Other

Dumfries and Galloway Greens, No Galloway National Park, South of Scotland wildlife hospital (3)

Annex D - A selection of quotes from the surveys from individuals, businesses and organisations

Supportive

"The close and longstanding relationship between landscape, nature, land use and community development, together with almost continuous habitation of the coastal strip for at least 6,000 years, have intertwined to create a unique identity in Galloway. This is evidenced by the overlap within the proposed boundary of natural and cultural designations, contrasting with the areas outside".

"It's easy to pick the beauty spots such as Glen Trool and the Ayrshire coast, but national parks should also encompass the grittier, industrial heritage of the area. We live in the Doon Valley where the river Doon supports a rich diversity of wildlife, and the sides of the valley are still tattooed with the scars of the mining industry which once dominated the area".

"Overall, this National Park has the potential to become a model for balancing environmental sustainability with community needs, benefiting both people and nature for generations to come".

The creation of a national park would be like any business – it's scary, it's new, it involves change but with the right leaders it will grow and succeed and survive for a long time. The A75 isn't going to become full of people on day one. It takes years to market an area, to put things in place. The National Park also won't work without investment in infrastructure. Surely this is a win-win".

Undecided

"We have so few years left to take decisive action on climate change and biodiversity crises. Is the NPA the best way to achieve a sustainable future for Galloway? In addition to one centralised board, there would need to be lots of local engagement mechanisms, much more than biosphere have done, and these would need to provide proper, meaningful spaces for dialogue to address issues and harness ideas of local people".

Unless Scottish Government decide to hold a referendum on the proposed National Park for all eligible residents in the affected area with clearly defined boundaries, an indicative budget and a governance model, it is not clear whether the majority of local residents support the principle of a National Park being established or oppose it.

"This polarising debate has been conducted in the absence of any actual facts about the way in which this park may differ from others and so we have had unsubstantiated claims for huge benefits from the Yes lobby and understandable but possibly equally unfounded scare stories from the No lobby. At the very least this process needs a reset and much more considered approach if it is to go forward"

"An alternative model has the potential for greater local and community buy in, can build on existing initiatives and partnerships, could address issues of local democratic accountability and control, and offer a "light touch" management and governance regime"

Opposed

“The area has many very different characteristics (large scale farming; hill farming; mass afforestation, costs, sea, mountains, uplands) which need different strategies and managements. As such there is no single distinctive characteristic or coherent identity - particularly when considering such a large area as proposed. To pretend otherwise is disingenuous”.

“Does ever increasing … intensification of farming, along with monospecific coniferous forestry demonstrate those areas have a natural heritage? There's no doubt some of the land looks nice, but the commercial reality of these areas would make the aims of a National Park very difficult to achieve”.

“Galloway is an area that needs more attention from government. The best way to achieve this is by identifying the deficiencies in housing, employment, infrastructure, retail and hospitality in order to implement specific improvements for the benefit of the community. This targeted approach has to be better than simply setting up another layer of bureaucracy with a broad remit and little real accountability to the people who live in Galloway”.

“No, I do not believe that the traditional focus and activities of National Parks are what this region needs. We would like the National Park brand, for economic reasons, but we need a much more economically based delivery model than that which is provided via the National Park framework.”

Annex E - Assessing and selecting the area of the proposed National Park

1. In making its proposal for a Galloway National Park, Scottish Government asked NatureScot to investigate, consult and provide advice on possible options for the Park area. It also indicated that it could be smaller or larger than the area outlined in the bid.

2. This annex outlines the methodology used by NatureScot to develop its advice on the area that the proposed National Park could cover. It also provides a brief description of the boundary of the two options we consider in our advice. To undertake this work, we adapted the method we had previously developed for determining the areas of the existing two National Parks in Scotland. This was informed by commissioned research and discussion with key partners. At its core is a simple, structured approach based on desk-based review and field work.

3. The indicative area in the nomination by the Galloway National Park Association and Galloway & Southern Ayrshire Biosphere Reserve (see map 1) provided the starting point for consideration of the possible area of the proposed National Park, together with additional information provided by Scottish Government's appraisal of the bid. Fieldwork and analysis described below together with input from Historic Environment Scotland helped develop options for the consultation. Following the consultation, further internal review was undertaken taking into account relevant responses to finalise NatureScot's advice on the preferred area of the proposed National Park.

4. At this reporting stage, we are only considering broad areas for potential inclusion or exclusion, not a detailed boundary which would be identified and consulted on as a later part of the designation order process. While consulted on the principles that could inform the identification of a detailed boundary, further investigation would only be undertaken if the Scottish Government decided to proceed further towards designation of a National Park.

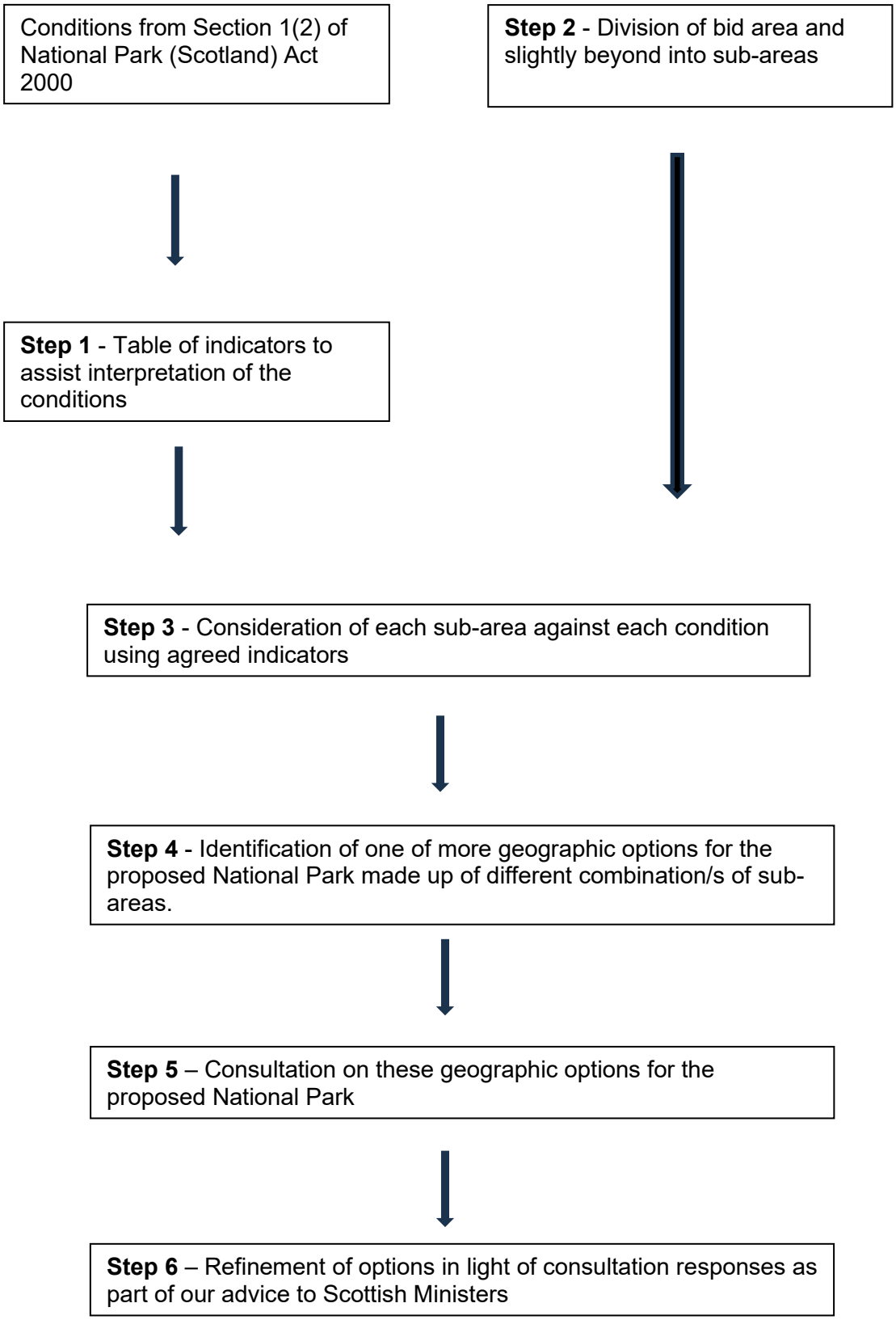
Approach

5. Experience in establishing the existing National Parks has shown the identification of a proposed Park area is a matter of judgement rather than a precise science. Community considerations are also important, which means that proposals can and should change as a result of consultation.

6. A structured approach to this task is essential. In particular, this needs to:
   - differentiate between consideration of the broad geographic area (reporting phase) and the detailed consideration of its boundary (designation order phase),
   - develop a set of criteria to help make, and explain, judgements about the area options being investigated and consulted on,
   - consider the relationship between the planning and management of the proposed Park area with its surrounding area, and
   - prepare a rational explanation to accompany the preferred option or options.

7. The approach we adopted is illustrated in figure 1 below. A full description was provided in the methodology report produced during the consultation phase

Figure 1 - Approach to identifying possible options for the area of the proposed National Park



8. The **first step** was to develop a set of indicators to help the detailed consideration of the three conditions for National Park status set out in Section 2(2) of the National Parks (Scotland) Act. Our starting point for this were the indicators previously developed for this purpose for the designation of the existing National Parks. **Table 1** illustrates the finalised indicators together with notes on how they could be applied to southwest Scotland.

9. The **second step** was a desk-based review of the indicative area to divide it into a number of coherent sub-areas, as shown in **Map 2**. Divisions were based mostly on landscape character, using the national dataset, as this provided appropriate elements and a suitable scale for this stage of the work. To ensure the work was comprehensive, the sub-areas extended beyond the indicative area identified in the bid. Eighteen sub-areas were initially identified which is in line with the level of detail used for assessing the existing National Parks areas (20 sub-areas were identified for Loch Lomond & the Trossachs and 29 for the Cairngorms).

10. The **third step** was fieldwork, conducted over two weeks in late September and early October 2024, to assess each sub-area for its contribution to the three conditions of the Act. The fieldwork team of seven members of NatureScot staff was divided into four groups of at least two staff per fieldwork session, with a landscape architect involved throughout for consistency. The fieldwork also enabled a check on the validity of the draft sub-areas. As a result, 3 areas were amalgamated and 2 divided, reducing the number of sub-areas by one, to 17.

11. The **fourth step** was desk-based assessment to consider one or more possible geographic options for the National Park area made up of different combination/s of sub-areas using a five-fold ranking system for considering the case for inclusion of each sub-area from low to high as follows.
    - Minimal
    - Minor
    - Partial
    - Significant
    - Extensive

12. The results of these exercise are shown in **Table 2**. As well as staff expertise, this exercise was informed by comments to a survey on the issues and opportunities within the proposed National Park area made on the online community information hub by members of the public during the pre-consultation phase of reporting work.

13. We identified three options for consultation made up of the following sub-areas:

Option	Sub-areas
Hills and coasts	7,8,9, 10,13
Hills and extended coast	1,5 7,8,9, 10,13, 14 and 15
Hills, extended coast and countryside.	1-15

14. We considered that these three options presented the possible range of combinations of different sub-areas based on their contribution to the legislative conditions. They also made sense in broad geographic terms.

15. The **fifth step** was the consultation on these three geographic options for the proposed National Park. To inform responses, the consultation paper contained a short description of each option and our assessment on how it met the conditions of the Act – see Table 3.

16. While we received considerable comment on each of these of the three options and the extent to which they meet the legislative conditions for Park status, the methodology and appraisal which underpinned them were not challenged during the consultation.

17. An additional area, upper Glen Afton, was proposed by East Ayrshire Council during the consultation. This area was assessed as a sub-area in mid-March 2025 (with the findings included in Table 2 for comparison with the other sub-areas).

18. In the **sixth step**, we reviewed the assessment following comments received from the formal consultation and two options were investigated further. These two options are shown in Map 3 and described below.

    - **Option A - core hills and coast**. This is a smaller than the smallest option we consulted on (option 1). It focuses on the Galloway Forest Park (GFP), Cairnsmore of Fleet National Nature Reserve (NNR) and the Fleet Valley National Scenic Area (NSA). These designations are mostly contained within sub-areas 7 and 8 of the area, both of which scored highly in terms of meeting the conditions of the Act.

    - **Option B -extensive hills, coast and countryside**. This is the same as the largest option we consulted on (Option 3). It contains all the sub-areas which score highly in terms meeting all the conditions of the Act but also others which did not score so highly against all of them. The lowest ranking sub-areas - 16 and 17 - are excluded.

    Map 4 provides a summary from all surveys of the degree of support and opposition by postcode with reference to these two options.

19. A brief description of an indicative boundary for both these areas is provided in Tables 4 and 5. Overall, the general considerations underpinning these involve a mix of river courses, river catchments, watersheds and minor roads. The precise boundaries of the Galloway Forest Park (GFP), Cairnsmore of Fleet National Nature Reserve (NNR) and the Fleet Valley National Scenic Area (NSA) would also need to be checked as these are established.

20. As with identifying the proposed area for designation, boundary setting is a matter of judgement, not a precise science. Experience from the current National Parks in Scotland and elsewhere in the UK, and results from the consultation suggest a flexible

approach would be needed that reflects the features, and range of landscape types, which may be found at the margins of the area as well as the more detailed assessment of land management units, administrative boundaries and relevant natural systems and processes. Further consultation with land managers, community councils, local authorities and other public bodies will also be required.

NatureScot
May 2025

Map 1 - Area proposed in the nomination by Galloway National Park Association and Galloway and Southern Ayrshire Biosphere Reserve

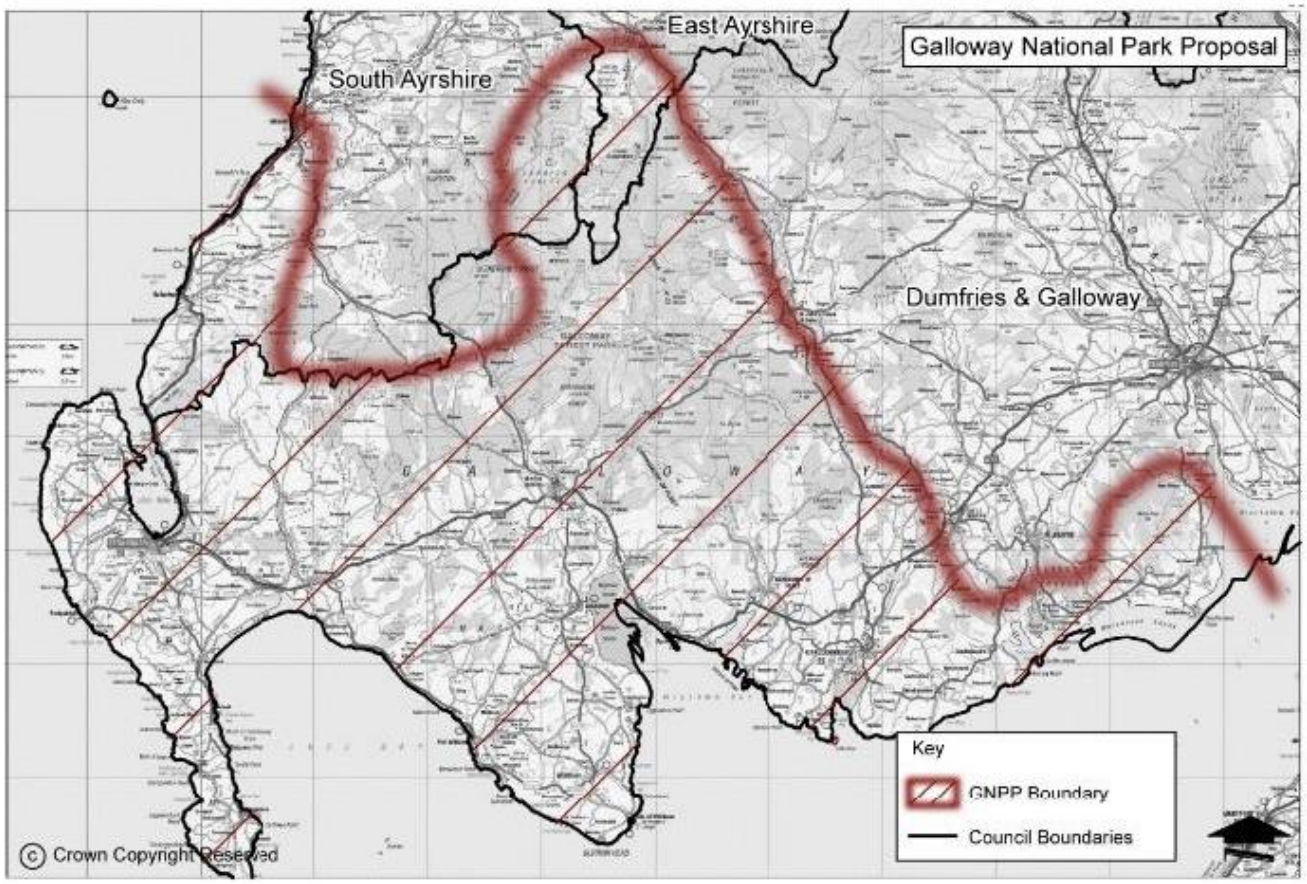


Table 1 - Evaluation framework and indicators to assist with the identification of options for the area of the proposed National Park in Stage 1

Legislative conditions	Components	Indicators	Notes for proposal for a National Park in southwest Scotland
Outstanding national importance	Does the area contain nature conservation, landscape or cultural heritage interests of the highest national significance, extent and quality?	Presence and extent of international, national and local designations for 1) biodiversity and geodiversity (European Sites; Sites of Special Scientific Interest, National and Local Nature Reserves) 2) landscape (National Scenic Areas, Wild Land Areas, and Local Landscape Designations) 3) historic environment (scheduled monuments, gardens and designed landscapes, historic battlefields, conservation areas)	Compared to their natural heritage equivalents, historic environment designations tend to be much smaller and/or point features. Discussion with Historic Environment Scotland helped to consider how these can be best be used in the assessment process alongside historic land-use assessment.
	Natural systems and processes – are they predominant in the sub-area?	Extensive areas of semi-natural habitat, dynamic river systems and processes.	Much of the area is highly modified, though it will be important to look at river catchments and coastal systems in refining a preferred area and its boundary.
	Do the special qualities of the area provide opportunities of national importance for enjoyment and understanding of the natural and cultural heritage?	Range, scale and significance of outdoor recreation resources dependent on the special qualities of the area. Range, scale and significance of opportunities for the understanding of the natural and / or cultural heritage.	Key features include national paths and trails (e.g. Scotland's Great Trails, National Cyle Network); recreational facilities (e.g.

Legislative conditions	Components	Indicators	Notes for proposal for a National Park in southwest Scotland
			Forest Park, Dark Sky Park, 7Stanes, etc.) and visitor attractions (e.g. HES, NTS, RSPB Logan RBGE outstation etc).
Distinctive character and coherent identity	What is the contribution to the distinctive character of the area?	Relative contribution of each sub-area to the overall character of Galloway or southwest Scotland.	Judged from bid, information available from landscape character assessment and historic land-use assessment and fieldwork. Informed by contributions from Historic Environment Scotland.
	What is the contribution to the coherent identity of the area?	Relative contribution of each sub-area in terms of local traditions, sense of community identity and historical and artistic associations.	
Special needs of the area	Are the threats to the natural, cultural heritage and recreational qualities of the area, or opportunities for their enhancement, sufficient to merit national effort and enhanced resources?	Loss or deterioration of natural and cultural heritage interests, or potential for their enhancement. Nature of opportunities for enhancing the quality of the area. Scale and significance of the need for more management of outdoor recreation, overcrowding, and traffic congestion.	Judged on information available and provided through the contributions received during pre-consultation phase.
	Does the management of the natural resources of the area require the more integrated and specialised approach of a National Park?	Scale and significance of conflicts between different land uses, between land management activities and recreation use, and between different recreational uses.	
	Are there likely to be specific social and economic benefits for the area of designation as a National Park?	Dependence of the local economy on the sustainable use of its natural resources, and the natural and cultural heritage of the area.	

Legislative conditions	Components	Indicators	Notes for proposal for a National Park in southwest Scotland
		Social and economic factors arising from the current pressures on the area Opportunities for marketing of products and services derived from the special qualities of the area.	

Map 2 – Finalised Sub-divisions for investigating the indicative area in Stage 2

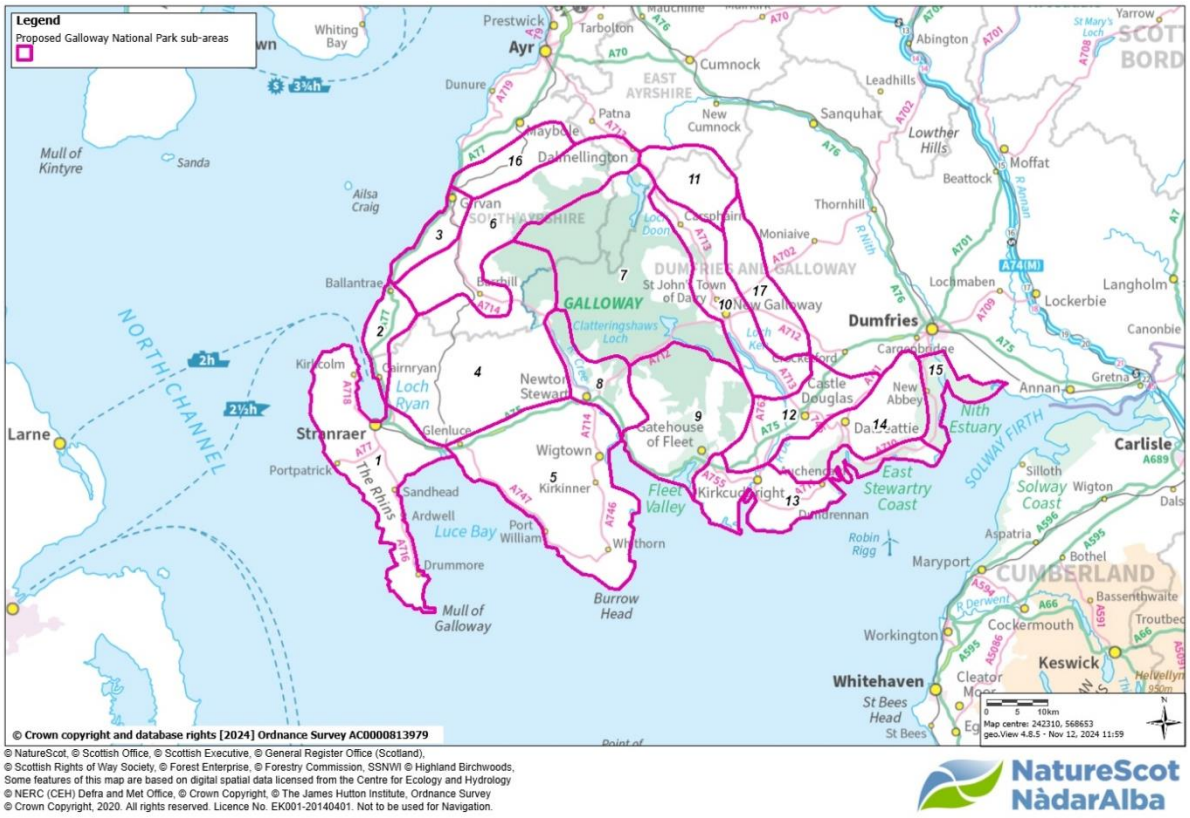


Table 2 - Assessment of the contribution of each sub-area to the legislative conditions for Park status in Stage 3

Sub area	Provisional name	Outstanding national importance	Distinctive character and coherent identity of the area	Designation would meet special needs of the sub-area	Assessment of contribution of sub-area to the legislative conditions
		- Natural heritage (nature and l'pe) - Cultural heritage - Natural systems and processes - Recreation interests	- What is the sub-area's contribution to the distinctive character of the area - What is the sub-area's contribution to the coherent identity of the area?	- Threats and opportunities for heritage interests - Complexity of land use issues - Dependency of, and opportunity for, economy on heritage interests	5 – extensive 4 – significant 3 – partial 2 – minor 1 – minimal
1	The Rhins	Partial 3	Significant 4	Minor 2	3
2	Cairnryan to Ballantrae	Partial 3	Partial 3	Minor 2	3
3	Ayrshire coast	Partial 3	Partial 3	Minor 2	3
4	Wigtownshire and southern Ayrshire moors	Partial 3	Minor 2	Minor 2	2
5	The Machars	Partial 3	Significant 4	Minor 2	3
6	Ayrshire dales and foothills	Minor 2	Partial 3	Partial 3	3
7	Galloway Hills	Extensive 5	Extensive 5	Extensive 5	5
8	Glen Trool, Cree valley	Significant 4	Significant 4	Extensive 5	4
9	Cairnsmore of Fleet, Creetown	Extensive 5	Extensive 5	Extensive 5	5
10	Glenkens	Partial 3	Significant 4	Extensive 5	4
11	Cairnsmore of Carsphairn	Minor 2	Partial 3	Partial 3	3
12	Dee Lowlands	Minor 2	Partial 3	Partial 3	3

Sub area	Provisional name	Outstanding national importance	Distinctive character and coherent identity of the area	Designation would meet special needs of the sub-area	Assessment of contribution of sub-area to the legislative conditions
		- Natural heritage (nature and l'pe) - Cultural heritage - Natural systems and processes - Recreation interests	- What is the sub-area's contribution to the distinctive character of the area - What is the sub-area's contribution to the coherent identity of the area?	- Threats and opportunities for heritage interests - Complexity of land use issues - Dependency of, and opportunity for, economy on heritage interests	5 – extensive 4 – significant 3 – partial 2 – minor 1 – minimal
13	East Solway Coast	Significant 4	Extensive 5	Significant 4	4
14	Coastal Hills	Partial 3	Extensive 5	Significant 4	4
15	Nith Estuary	Extensive 5	Extensive 5	Significant 4	5
16	Water of Girvan	Minor 2	Minor 2	Minor 2	2
17	East of Glenkens	Minor 2	Partial 3	Minor 2	2
Post consultation					
-	Upper Glen Afton	Negligible 1	Minor 2	Minor 2	2

Table 3 - Overview of the options for the proposed National Park area presented in the consultation paper in 5

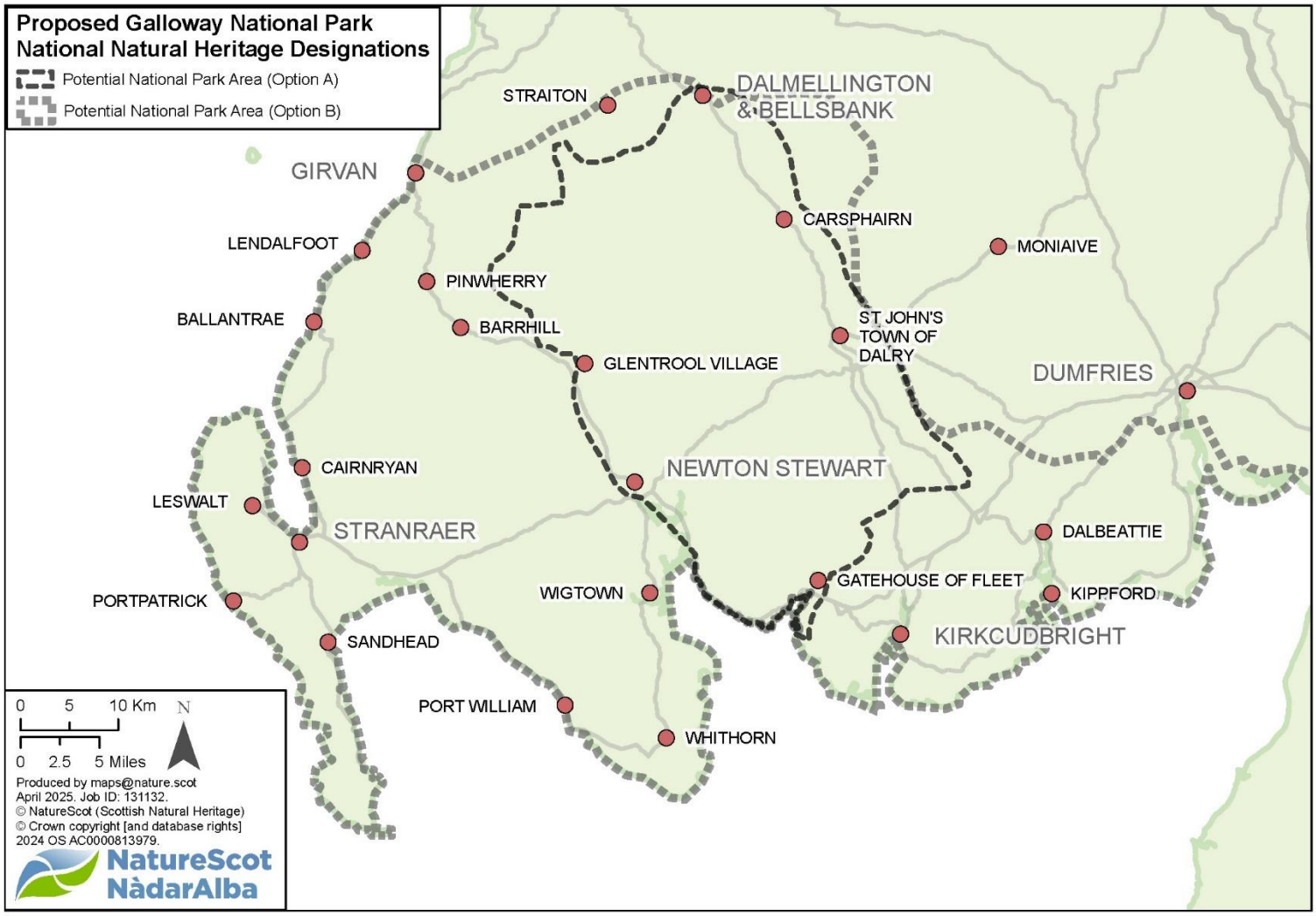
	Option 1 Hills and coast	Option 2 Hills and extended coast	Option 3 Hills, coast and countryside
Size (ha)	155,915	274,749	417,718
Estimated population	14,820	42,434	61,402
Main settlements	Gatehouse of Fleet, Kirkcudbright, New Galloway, Newton Stewart	As option 1, plus Dalbeattie, Portpatrick, Stranraer, Whithorn and Wigtown	As options 1 and 2, plus Ballantrae, Barrhill, Castle Douglas and Girvan
% areas of each of main Nature and landscape designations	Nature designation 12% SSSI 6% SAC 0.9% SPA 1.2% Ramsar 1.2% NNR 0.16% LNR Landscape designation 6% National Scenic Area 85% local landscape designations	Nature designations 9% SSSI 5% SAC 1.6% SPA 1.7% Ramsar 1% NNR 0.34% LNR Landscape designations 8% National Scenic Area 64% local landscape designations	Nature conservation 9% SSSI 4% SAC 3.2% SPA 1.2% Ramsar 0.6% NNR 0.22% LNR Landscape designations 5% National Scenic Area 50% local landscape designations
Natural and cultural heritage importance	The area includes the Core area of the UNESCO Biosphere Reserve as well as one of two Wild Land Areas in South of Scotland. It also would incorporate most of the Galloway Forest Park and all of the Galloway Dark Sky Park and the Cairnsmore of Fleet National Nature Reserve. The area comprises a distinctive mix of hills that form a regional landmark,	The area includes a much more extensive coastline of rocky headlands, low cliffs and sandy bays. The Mull of Galloway is the southernmost point of Scotland. The cultural heritage includes the cradle of Scottish Christianity at Isle of Whithorn. Wigtown is Scotland's book town, and WWII links include D-Day training locations. 'Land of the Leal' was set in the Rhins. The start/end point of the Southern Upland Way is at Portpatrick on the west coast of the Rhins while new Kirkpatrick C2C cycle route	At Ballantrae there are rare remnants of once-oceanic crust from ancient tectonic plate collisions. Cultural heritage interests are extensive, with particular notable evidence of pre-historic hut circles to the east of the area. The area includes both the Southern Upland Way and Ayrshire Coastal Long-Distance Routes, which together with NCN routes and many other paths and trails are part of the

	Option 1 Hills and coast	Option 2 Hills and extended coast	Option 3 Hills, coast and countryside
	and varied and highly scenic coastline of rocky promontories and estuarine flats. Parts of the area are long settled, with archaeological remains on the coast. Cultural heritage includes associations with artists, personified in Kirkcudbright as the painters' town.	starts/ends at Stranraer. There are stretches of coastal path which are the building blocks to the ambitious plans for a SW coastal long distance route. NCN 73 and 7 cross the area	wide range of recreational opportunities of the region.
Distinctive character and coherent identity	In part because of the large-scale commercial forestry that dominates their lower slopes, the Galloway Hills are distinctive, wild and feel remote. They provide a regional landmark. Lochs and rivers, and richly wooded river valleys are typical. The interplay of natural and cultural heritage, and the meeting of land and sea are key elements of the landscape of the area. The infrastructure of early twentieth century hydroelectric power schemes is distinctive. In the Glen Kens it is the	The inclusion of more of the Solway coast increases the marine character of the area. Extensive coastal flats are of an openness and horizontal scale unusual in Scotland, as is the incoming tide as fast as 'a galloping horse'. The coastal hills, particularly Criffel as well as the Mull of Galloway, are key landmarks. The farmland, settlements and historic patterns of land use are distinctive. Drystone dykes are typical. The Machars peninsula in particular is said to be the epitome of Galloway culture. It is an important food producing region and contains almost half the Scottish dairy herd in its lush pastures. There are hill sheep farms and beef cattle, of which the distinctive Galloway breed is synonymous with the region.	In addition to the features of Options 1 and 2, the Carrick coast and countryside typically includes farmland backed by raised beaches. It is a well-settled landscape, with pastoral river valleys and policy woodland as well as upland farmland and moorland. More of this area is characterised by extensive forestry. It also includes a number of large wind farms with related grid infrastructure.

	Option 1 Hills and coast	Option 2 Hills and extended coast	Option 3 Hills, coast and countryside
	basis for water-based recreation. Sometimes known as Scotland's Riviera, the Solway coast is a long-established holiday destination. Settlements are often distinctive and traditional in character.		
Meeting the special needs of the area	The area depends on both its primary production (forestry and agriculture) and the visitor economy. Accordingly, it relies on the health and quality of its natural and cultural heritage to sustain its socio-economic needs. There are extensive opportunities for nature recovery from source to sea, including restoration of peatland, native woodland, and coastal habitats. There are land use issues relating to the balance between forestry, upland farming and recreation and their impacts on the natural and cultural heritage. Building more resilience to climate change in the commercial forestry	Many of the issues and opportunities described in Option 1 also apply here The inclusion of the larger coastline would provide more opportunities for restoring coastal habitats, managing the impacts of climate change and developing coastal and marine recreational opportunities, including completing the SW coastal path. The area would also be linked by train from Ayrshire, providing more opportunities for sustainable travel. Depending on how far inland the extended area went, there could be more opportunities to support farmers to tackle climate change and increase biodiversity on their land in ways which benefited the resilience of their business. However, the extent of intensive [dairy] farming could lessen the difference that a National Park could make, given the smaller role of government support for these businesses.	Many of the issues and opportunities described in Options 1 and 2 also apply here. The wider area is seen as critical to meeting renewable energy targets both through new wind farm capacity and improving related grid connections. A National Park could help plan for this positively with the industry and the community. This larger area could also help realise a SW coast path to complement the other long-distance walking and cycling trails the area has to offer. It could also provide the potential to do more to record and promote understanding and enjoyment of the rich and distinctive cultural heritage of Galloway.

	Option 1 Hills and coast	Option 2 Hills and extended coast	Option 3 Hills, coast and countryside
	sectors will be critical for its long-term success. There is considerable scope for expanding recreational routes and opportunities, emphasising the relative wildness and challenging nature of the hills. There would be opportunities for both refreshing existing visitor facilities as well as developing new ones. Initiatives that extended the visitor season and increased responsible tourism and public access would be of benefit.	Inclusion of more of the western communities such as Stranraer could help support economic recovery.	Inclusion of more of the north-western communities such as Barrhill and Ballantrae could help support economic recovery in this area. Girvan could benefit as gateway community even if not included.
Key questions to consider further	Should the communities of Dalmellington and Straiton be included? Should Cairnsmore of Carsphairn be included?	How much of the countryside of the Machairs and Rhins should be included in addition to the coast?	Should Girvan be included in the National Park?

Map 3 – Proposed Options A and B developed in Stage 6



Map 4 – Summary of the positions from all surveys by postcode with reference to these two options

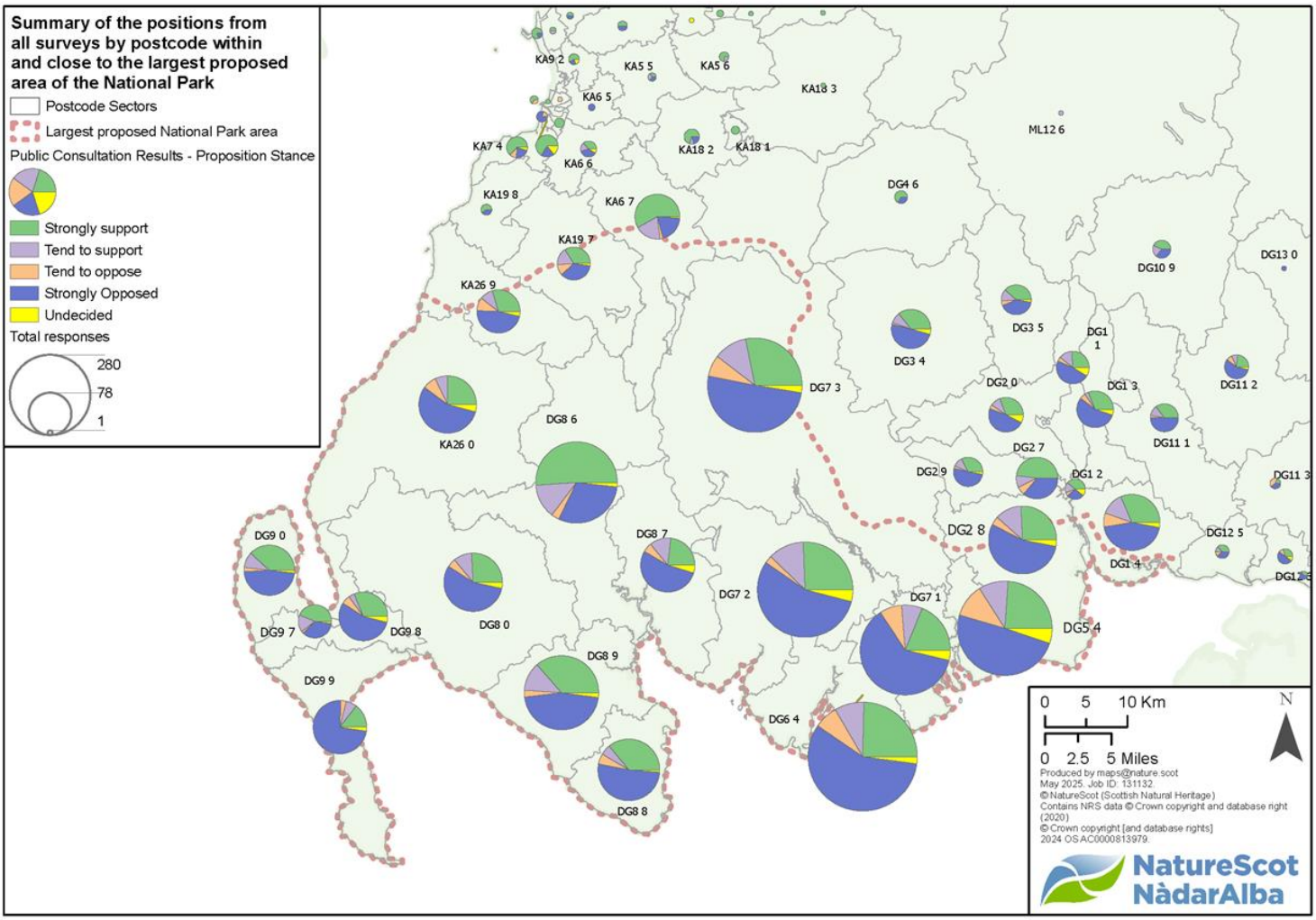


Table 5 - Indicative boundary considerations for Option A Hills and Coast (presented clockwise from the northwest).

Barr to Bellsbank and Dalmellington	The GFP boundary may be complex in this area. It may be that a simpler National Park boundary could follow the River Stinchar from Barr, with that settlement being included. A line from Mid Hill to the west of Drumnellie Hill, perhaps along the Albany Burn, could achieve this. Alternatively, a line further east from around Loch Moan, and Polmaddie Hill, could join the River Stinchar further upstream at North Balloch and South Balloch. The boundary would probably diverge from the River Stinchar near Tairlaw Plantation west of Loch Bradan, to encompass the upper reaches of the Water of Girvan and Straiton. East of Straiton, the Lambdoughty Burn and Red Burn could be followed to the River Don west of Dalmellington. There is a question whether to follow this line, or loop south to omit Dersalloch wind farm. The Red Burn, or the boundary of Craigengiallen Inventory Garden and Designed Landscape, could from the edge that would then include Dalmellington, and Bellsbank. A boundary on the B741, perhaps quite close to the hills around Dalmellington, would then run southwards east of the A713.
Dalmellington to Carsphairn	The boundary could run southwards, east of the A713, taking a line along minor watercourses and a watershed, to omit large area of wind farms at South Kyle, Windy Standard etc. This would exclude at least half of sub-area 11, but we suggest incorporating the summit of Cairnsmore of Carsphairn, which is broadly similar to the Galloway Hills.
Carsphairn to south end of Loch Ken	The Glenkens settlements, including St John's Town of Dalry, New Galloway, Balmaclllan, should be wholly included. This could be done by following minor watercourses and minor roads on the east side of valley. The southern end of Glenkens would need careful consideration to avoid repeat entry/exit of National Park on any roads. We suggest excluding Castle Douglas, which nevertheless could serve as a gateway town. There is a range of historic features around the River Dee, such as Threave Castle that may influence the boundary and bring it further south; otherwise a line from Laurieston to the northwest may help to avoid an expanse of intensive agriculture.
South end of Loch Ken to Gatehouse of Fleet	A boundary to include parts of the Forest Park at Laurieston Forest and Glengap Forest, also staying west of the minor road from Gatehouse to Laurieston, could then line up with the Inventory

	Garden and Designed Landscape at Cally Palace and the adjacent Fleet Valley National Scenic Area.
Gatehouse of Fleet to Newton Stewart	The Cree could be used as a boundary; or include both banks and more of the estuary. Newton Stewart should be within the Park. The boundary could follow one of the minor roads to the west of the town, perhaps the one joining the B7027, then following that towards Barrhill. The boundary could cross the A714 to link with the Galloway Forest Park edge in the area, following that towards Barr

Table 6 - Indicative boundary considerations for Option B – Hills, Coast and Countryside (presented clockwise from the northwest).

Girvan to Barr	Girvan, including the whole town; following valley of the Water of Girvan, on alignment to include both banks of the river, to Barr. Same boundaries as for Option A followed to south end of Loch Ken.
South end of Loch Ken to Mabie Forest	A line to head east, probably north of Crossmichael, and Old Bridge of Urr and Haugh of Urr (the north end of sub-area 12), to cross the A711 before running north to encompass Mabie Forest.
Mabie Forest to Caerlaverock	The boundary of the Nith Estuary National Scenic Area to be followed to the coast east of the Nith.
Caerlaverock to Girvan	Mean low water springs line

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