Consultation response

Response to Proposed National Park in Galloway February 2025



Key points

The Scottish Wildlife Trust is conditionally supportive of a new National Park in Galloway and Southern Ayrshire in southwest Scotland, provided that:

- Nature and wildlife are meaningfully protected, and that the Government's biodiversity goals are prioritised;
- Sufficient and ongoing funding is provided without reallocating current funding available to the two existing National Parks or other nature conservation activities; and
- The local community and relevant stakeholders (including local conservation organisations) are actively involved throughout.

If these requirements are not met, the Trust is concerned that establishing a third National Park risks spreading resources too thinly and will fail to achieve significant progress on nature and biodiversity restoration.

Question 1: To what extent do you support the idea of a new National Park being established in the southwest of Scotland?

Our response:

The Scottish Wildlife Trust is conditionally supportive of a new National Park in Galloway and Southern Ayrshire in southwest Scotland, provided that:

- Nature and wildlife are meaningfully protected, and that the Government's biodiversity goals are prioritised;
- Sufficient and ongoing funding is provided without reallocating current funding available to the two existing National Parks or other nature conservation activities; and
- The local community and relevant stakeholders (including local conservation organisations) are actively involved throughout.

If these requirements are not met, the Trust is concerned that establishing a third National Park risks spreading resources too thinly and will fail to achieve significant progress on nature and biodiversity restoration. We consulted with our members in and around the proposed area, as well as directly with Trust staff who work in the region to inform our reply.

The Scottish Government expects a new National Park in Galloway to contribute to its key priorities of growing the economy, tackling the climate emergency and improving public services. The Trust feels it is critical that a new National Park delivers biodiversity benefits alongside other land uses, as the natural environment is the foundation of our society and economy. The National Park should also support the sustainable visitor economy and have a positive impact on people's social, mental and physical health – while having a positive impact to the natural environment. Otherwise, the use of the name 'National Park' will be simply a promotional label with little meaning.

There are important roles in nature restoration, carbon sequestration, water management and sustainable transport and sustainable housing that a National Park should help to drive forward. It should also contribute to sustainable economic development more generally, for example through employment in nature restoration, climate mitigation and adaptation projects, as well through new opportunities for nature-based and sustainable tourism.

A new National Park must have clear and enforceable goals focused on protecting and enhancing biodiversity and should align with the Government's objectives outlined in the recent Biodiversity Strategy to halt biodiversity loss by 2030, and to restore and regenerate biodiversity by 2045. The commitment to protect 30% of our land and seas for nature by 2030 (30 by 30), and other net zero commitments to reduce Scotland's emissions should also be reflected in the proposed new National Park.

If a new National Park is to bring benefits to nature and people, then there needs to be a substantial and ongoing commitment for funding. Establishing a new National Park without significant dedicated funding would dilute resources already stretched thinly across Scotland's existing National Parks. Without sufficient new funding, the Trust is concerned that the new National Park would fall short in delivering tangible benefits for nature and biodiversity, and the local communities — and crucially, jeopardise the effectiveness of the existing National Parks and wider national conservation efforts. Conservation funds are limited, and resources must be allocated where they will have the greatest impact on protecting and restoring ecosystems. If the establishment of a new National Park does not deliver clear benefits to nature, then perhaps this money is better spent elsewhere.

We have seen real term cuts to environment funding, and we must prioritise the key actions that will help us meet the 2030 targets. The Government must seriously consider the absolute priorities against the Biodiversity Delivery Plan, and if the proposed National Park and existing Parks are not adequately funded, they will not deliver for nature.

It is also essential to involve the local community actively and secure their buy-in before establishing a new National Park, and on an ongoing basis if the National Park were established. Failing to engage with the local communities in and around the proposed park – including farmers, landowners, and local community and conservation groups – risks alienating these groups and undermining conservation efforts.

The Trust would also expect NatureScot to consult with us specifically over access issues and infrastructure given the Trust reserves in the proposed area. There is a concern that the infrastructure on our reserves is not geared up for a large number of additional tourists entering the area of the National Park, so adequate infrastructure and consultation would be needed in these areas to ensure there is no harm to the biodiversity value of our sites. Furthermore, on some of our sites building additional infrastructure is just not possible without significantly impacting on biodiversity value.

There are additionally strong concerns, based on their valid lived experience, from our reserve management teams that a National Park will bring increased disturbance, trampling, litter, and fly tipping to our reserves and put pressure on our neighbour's land. Regardless of National Park status we have seen increases in all of these pressures with very little to no help from Government to deal with the issues. We would therefore question what support would specifically be given to help cope with these issues under a new National Park. We would need to see plans, support, resources and robust policy to address these issues.

Finally, much of our work in the area relies on volunteer support. It is already very difficult to source accommodation in the area and we are concerned about the impact that the new National Park could have on availability of affordable rural housing and the resultant impact on our volunteers and staff.

Question 2b: Would you like to make any changes to or comments on your preferred option (e.g. make it smaller or larger, add or remove particular areas, features or settlements)? If so, where and why?

Our response:

Including too many of the larger settlements (e.g. Stranraer) could potentially distract the Board's attention from some of the key land management challenges.

Question 3: Please note any comments on these suggestions for planning, access, forestry and wind farms in the box below.

Our response:

Planning, access, forestry, and wind farm policies must be underpinned by a strong commitment to biodiversity and nature conservation. Decisions should sustainably balance public and economic interests with the overarching goal of protecting and enhancing the natural environment of the new National Park.

Planning policies within the proposed National Park must prioritise biodiversity and habitat protection. Any developments should undergo rigorous environmental impact assessments to ensure they do not harm or disrupt habitats or key species. Landscape scale planning frameworks should emphasise ecological connectivity, sustainable land use, restoration of degraded ecosystems, and support for nature-friendly agricultural practices. For example, designating specific trails and routes to avoid disruption by tourists, particularly in ecologically vulnerable areas, can help minimise the impact of foot traffic.

Forestry practices in the National Park should prioritise native woodland restoration over commercial monoculture plantations. Expanding native woodlands will provide essential habitats for wildlife and support net zero goals by storing carbon. Clear guidelines should prohibit practices such as large-scale clear-cutting, which can lead to soil erosion and biodiversity loss. Collaboration with forestry stakeholders and local communities is crucial. There is also a particular opportunity for riparian river network expansion.

While renewable energy is critical for addressing climate change, renewable energy developments or infrastructure within the National Park must not compromise biodiversity. Any sites should be carefully chosen to avoid sensitive habitats, bird migration routes, breeding seasons and sites, and areas critical to protected species. Cumulative impacts of multiple wind farms in the region need to be considered to avoid negative ecological impact. A robust planning and monitoring process is key to ensure that wind energy projects align with the National Park's conservation objectives.

Question 5: Should Scottish Ministers appointments to the Board include expertise on nature, farming and forestry?

Our response:

Yes.

Question 5b: What other areas of expertise would the Board require, and why?

Our response:

It is important that the Board contain both local representation and a suitable level of expertise on nature and conservation. Specifically, the Trust feels there must be appropriate landscape-scale and species ecological expertise included in the Board for the new National Park to be taken seriously as a positive development for biodiversity – particularly including expertise on riparian river networks. We would also support farming and forestry representatives being involved because a proposal such as this requires voices from across the community.

Question: Please add here any other comments that are relevant to the proposal.

Our response:

We note that an image of part of our reserve at Southwick Coast was used for the front cover of this consultation. Although there is nothing wrong with this in itself, it implies a certain level of support for this proposal from the Trust. Please take this response as our current position on the proposal.

The location where the photograph appears to have been taken is in an area which has suffered damage and habitat disturbance in recent years due to increased tourist foot traffic – including a long-established raven's nest being abandoned. We would hope to see measures to ensure these habitats are protected from potentially higher levels of tourist access if the proposal goes ahead in this area.

References

A Proposed New National Park in Scotland - Have Your Say | NatureScot

10 February 2025