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To : Nationalparkreporter@nature.scot
From : Sarah Cowie, Mhairi Dawson
Direct dial : 0131 472 4053
E-mail address : sarah.cowie@nfus.org.uk; Mhairi.dawson@nfus.org.uk

A PROPOSAL FOR A GALLOWAY NATIONAL PARK

Introduction

1. NFU Scotland (NFUS) is the leading agricultural organisation in Scotland. Representing more than 9,000 farmers, growers, and crofters, our members provide and support thousands of jobs and deliver significant economic, social and environmental benefits across Scotland.
2. Agriculture is the lynchpin of rural Scotland and is an important part of Scotland's booming food and drink industry. Scottish agriculture generates a gross output of £3.3 billion annually. The farming and crofting sector is committed to sustainable food production, enhancing biodiversity and helping to tackle climate change.
3. NFU Scotland has consistently opposed the designation of any new National Park across Scotland. We have engaged extensively with our members during previous public consultations in 2022 and 2023, where the majority expressed strong opposition to the creation of new National Parks. We also ran a survey from February-September 2024, of the 556 members who responded, 78% were against the proposal for a National Park bid.
4. Our position, which is echoed throughout our response, reflects concerns that a National Park would fail to provide benefits beyond those already delivered by existing structures and institutions in the region. Our members have also raised significant concerns about potential challenges to the planning system that could arise from such a designation.

5. We have concerns that there are still no details on how a National Park would be funded. At a time when public resources are under significant strain – for example, in the health service, education, and social care – a new national park is not a priority for the general public or for Scotland’s farmers and food producers.
6. We are also deeply concerned that another layer of bureaucracy and complexity is being laid at the door of farmers. There has been no discussion on how the National Park will operate relative to the Vision for Agriculture, and its priorities around food production, climate, nature and rural communities. This has the potential for confusion, inertia and outcomes not being met.
7. Farming and food production are highly important to Scotland’s rural economy and are the key drivers of the local community and landscape management that draws in other opportunities. This cannot be ignored or minimised when deciding on the designation of a new National Park.
8. We have also highlighted concerns we have around the process of this consultation. Many of our members feel that the proposals, and NatureScot as the Reporter, show clear and inherent bias, making it difficult to express opposition. Our members have described the decision to designate a National Park as a fait accompli. Others have said the process has been ‘cloak and dagger’.
9. To aid with this consultation response, NFUS undertook a survey that ran from 23rd December 2024 to 26th January 2025. The survey was open to all NFUS members. In total, there were 158 responses. 92.41% of respondents were from Dumfries and Galloway and Ayrshire. The comments on this survey, as well as our extensive engagement with members on this subject over several years, has formed the basis of our official response to NatureScot’s consultation.
10. While we are strongly opposed to a new National Park in Galloway, we are very much in favour of collaborating in order to achieve shared outcomes. We would like to note our strong relationships with existing organisations operating in the region, such as the GSA Biosphere and South of Scotland Enterprise. We believe that increasing investment in these existing bodies, as well as improving cooperation and partnership working, will go a long way in achieving the intended outcomes without the need for a National Park.

Gauging support for the proposal and alternatives to it

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

1. Strongly oppose

Question 1b: Please tell us the main reason(s) for your opinion.

11. We strongly oppose the creation of a new National Park in Galloway. In our member survey, 75.68% of respondents stated their strong opposition. 11.49% of respondents strongly supported, 6.08% tended to oppose, while 2.03% and 4.73% tended to support or were undecided, respectively.
12. The main reasons for our members' opposition are around the additional bureaucracy and red tape that would come with the creation of a National Park. We feel that it would be a backwards step for permitted development rights and any further restrictions on planning would hinder agricultural businesses and prevent them from growing.
13. We strongly believe that farming enterprises should be encouraged to modernise and innovate, and there is a sense of fear that a National Park designation would not allow them to do this. This is a significant risk for the country as a whole. Food producing businesses are a vital part of our national infrastructure and the importance of domestically produced high-quality food is only going to get more important.
14. We feel that a National Park would not bring any benefits to our members and their farming businesses over and above existing organisations. In our survey, members noted the GSA Biosphere, SOSE, South of Scotland Destination Alliance, the local authorities, local place plans, regional economic partnerships and SEPA, as just some of the organisations that are currently delivering for the area.
15. We are extremely concerned that the designation of a National Park and the establishment of the Authority would be a significant waste of public money, time and resources. We feel that much of the funding would go towards the running of the Authority, with very little left over for actual delivery. It would be more efficient to increase funding for existing organisations in the area. Some people noted their concerns over the governance of a potential National Park Authority, which could be seen as unaccountable to the local people.

16. Our members in the region believe there are greater priorities for investment in the region, such as health and education. In a time of constrained public finances, we do not think it is appropriate to designate a National Park when there are other more pressing priorities. As well as this, National Park designation could place increased pressure on an already overstretched public infrastructure. Members note that key roads like the A75 and the A77, as well as the smaller, local roads would be unable to cope. There are also issues with connectivity and the capacity of the existing healthcare system.
17. We are worried that National Park designation would lead to an increase in access-related issues. Livestock worrying, littering, dog/human fouling and gates being left open are all serious concerns for farmers and land managers. An increase in antisocial behaviours such as this could have serious impacts on our members' livelihoods.
18. We are also concerned about the impact of housing availability for local people. National Park designation could lead to an influx of retirees or second/holiday homes swallowing up the housing stock and pricing out the locals. This is of particular concern to the younger generation. It could also see the rental market availability reduced further.
19. Of those who responded to our survey and were in support of a National Park, the main reasons cited were around benefits for the economy, including long-term investment for the region. Some comments were around nature and environmental benefits that could be brought about as a result of designation.

Question 2a: Are there any alternatives to a National Park in Galloway that you would support? Please explain your answer.

20. The only alternative that most of our members would support is not having a National Park. Some respondents to our survey suggested strengthening the role and increasing the funding of existing local organisations such as the GSA Biosphere and Galloway Forest Park.

21. To repeat answers set out previously, we feel that there are several existing organisations in the region who deliver sufficiently for the area. We would like to see funding for these organisations increased. We would also like to see increased investment in infrastructure – particularly the A75 and A77, and investment in local education to improve local skills and employment opportunities.
22. There were some respondents to our survey that suggested if a National Park was to be designated, it should be restricted to the Galloway Forest area, Glentroll and Loch Doon as this would avoid key food producing areas.

Question 2b: What are the advantages of your preferred alternative(s) over a National Park?

23. We believe that working with established organisations is preferable. They are already known and trusted by the community, and the limited resources we have would not need to be allocated to their set up, recruitment of staff and management, etc. We believe that this would provide greater value for money for the region.
24. Respondents to our survey displayed a sense of mistrust toward a new ‘quango’ being established and feel that this would divert resources and money to civil servants who do not have a direct connection or interest in the area. Our members do not feel that this would result in an improvement to people’s lives. We feel that local people should have more of a say over how money should be spent, and budgets should be focused on key, targeted initiatives for the area.
25. The alternatives our members suggest are less drastic and therefore would be more acceptable to a greater majority of people. It would also have less impact on livelihoods, including food production and agriculture. We believe supporting the GSA Biosphere would allow collaboration and may be more acceptable to the farming community.
26. We also believe that our alternatives would avoid the oversaturation of tourism and the access-related issues that are recognised by other National Parks in Scotland and beyond.

27. A few respondents to our survey suggested supporting a significantly smaller park or utilising the Galloway Forest Park. This would avoid infringing on food production and agricultural businesses, as well as reducing the impact on people living in the area.
28. There were some comments around the difficulty of answering this question because of the lack of detail on what the National Park will actually look like.

Area of the proposed National Park

Overview of the options for the proposed National Park area

Question 3a: If a National Park was to be designated, which of the three options presented in the Map and Table would you support?

1. None

Question 3b: Please give your reasons.

29. 72.32% of respondents to our survey fell within the proposed boundary. Of the options, a majority (70.27%) voted for 'none'. 12.61% voted for Option 1, followed by Option 3 (9.01%), Other (5.41%) and Option 2 (2.70%).
30. We believe that our reasons mirror those echoed throughout – that a National Park should not include any major population centres or concentration of agricultural businesses. There were some responses to our survey that commented positively about opportunities for community, nature, visitors, tourism and wished to see the inclusion of rural areas most in need of investment, for example, Wigtownshire.

Question 3c: Do you have comments on the extent of the area in your preferred option? Would you add or remove particular areas, features or settlements to make the option smaller or larger? And if so, why?

31. We would like to reiterate our opposition to the concept of a new National Park and would prefer the status quo to remain. Dumfries and Galloway has some of the most productive grassland farms in Scotland and we believe that the proposals could threaten this for current and future generations of farmers.
32. Some respondents to our survey noted that a designation would not contribute to the area but in fact would challenge already stretched local resources. Many would prefer the money be spent elsewhere.

33. Other comments included:

33.1. Moving the area around Castle Douglas – with one person stating it would still benefit as a ‘gateway town’ but should not be included.

33.2. Similarly, one respondent noted that no major population centres should be included, as this would create issues for local people, for example, increased property values due to the desirability of second home ownership.

33.3. A couple of respondents believed the designation should be restricted to the Galloway Forest Park and surrounding hills, as that is the ‘most natural’ area.

33.4. One person does not understand why a designation should incorporate Ayrshire.

33.5. One person said it would make environmental sense to extend it west to include the western side of the Cree estuary and Wigtown Bay Regional Nature Reserve at least as far as the mouth of the Bladnoch.

Question 4: Is there another option for the area of the proposed National Park which should be considered? If so, what do you suggest and why?

34. We do not believe that any area within the region should be considered for National Park designation. Respondents to our survey repeated suggestions from the previous question that if a designation was to go ahead, the area should focus on the Galloway Forest – an area of near wilderness and limited population / business presence. However, in the same vein, people thought it would be more relevant if the Galloway Forest Park was retained, with increased investment, to provide the benefits of the proposed National Park.

35. Many respondents echoed these sentiments that existing businesses and tourist destinations should be supported. There was also the feeling that democratically elected local representatives should be ones deciding how money should or should not be spent.

Question 5a: Looking at the description of the options presented in the Table, do you think they meet the legislative conditions for designation?

- **the area is of outstanding national importance because of its natural heritage or its combination of natural and cultural heritage**
- **Yes/Partially/No Why?**

36. More than half (52.75%) of respondents said no, while 24.18% said yes, and 23.08% said partially. There were several different comments to the question. Overall, we feel that this question is misplaced and misleading. Where respondents have said no, it is clear that it is because they are against the proposal of the National Park, and not because they feel their area does not have strong natural and cultural heritage.

37. Most respondents commented that they believed the natural and cultural heritage of Galloway was one of the most diverse in Scotland and that this did in fact make it distinctive.

38. But this was followed by many comments stating that this heritage was a result of its reputation as an area of agricultural production, that produces much of our dairy, beef and lamb and which is well looked after by farmers and land managers.

39. On the other hand, many respondents felt that while Galloway does indeed have strong natural and cultural heritage, this was not unique, and that this label could be applicable to anywhere in Scotland.

40. Many comments reflected the idea that Scotland as a whole should be treated fairly and equitably in terms of designation and funding. Some felt that the designation was discriminatory and risked pitting areas against each other.

- **that the area has a distinctive character and coherent identity**

- **Yes/Partially/No Why?**

41. More than half (54.02%) said no, while 22.99% of respondents equally said yes and partially. The main reason for those saying no was that the area covered was too big for it to be reasonably described as having a 'coherent identity', particularly if parts of South and East Ayrshire are included.

42. Similar to the last question, respondents stated that the area does have a distinctive character with a diverse mix of landscapes, but that this is no different to many other parts of Scotland. And additionally, a National Park is not required to preserve this.

- **that designating the area a National Park would meet special needs of the area and would be the best means of ensuring that the aims of the National Park are achieved in a co-ordinated way.**

- **Yes/Partially/No Why?**

43. The overwhelming response to this question was no (81.93%), 13.25% said yes and 4.82% said partially. While some comments believed a National Park could bring coordination among the different interest groups in the area, the majority felt that the needs of the area could be met through existing channels.

44. It was felt these existing bodies and organisations should be better funded, more coordinated and could take forward priorities around investment, tourism and nature recovery for the area, without an additional layer of bureaucracy.

45. Some respondents felt unsure what the special needs of the area were and how a national park could deliver on them. Some also felt that the National Park designation would fulfil the Scottish Government's ambitions, and not those that live and work in the area.

Question 5b: Do you have any additional comments on the Table which might be relevant to the consideration of the geographic area?

46. We believe that as the geographic area is predominantly working farmland, the needs of these businesses should be taken into consideration. Specifically, the areas suggested cover the most productive and intensive dairy farming in Scotland and many feel this is not a suitable landscape for within a National Park.

47. It was felt that the contribution and management of farmers and foresters throughout generations is the reason the area is now being recognised as important. This is also crucial in the context of increasing global instability, and the importance of food production to our national infrastructure. This will only become more important and we must ensure that farming businesses in Scotland are sustainable, resilient and continue to produce high-quality and nutritious food.

48. Some respondents to our survey felt it was difficult to comment on the questions of boundaries without other additional details like a proposed budget or a terms of reference of the governing body. The process was described as 'being asked to shoot in the dark'.

49. Other comments on the geographic area included:

49.1. The map looks disconnected to any particular area.

49.2. Simple, natural boundaries would be the least-worst option for a National Park.

49.3. The hills, rivers and sea are all connected and should be conserved as a whole.

49.4. Whether it was possible to have more than one block of land not adjoining the park area – it was felt this was the only practical way of adding coastal areas to hill areas without including productive farmland and important villages and towns.

Question 6a: Do these principles provide a reasonable basis for drawing up a detailed National Park boundary for the area?

50. In our survey, 55.56% said no, 10.00% said partially, and 34.44% yes. However, again the comments suggested that people do not necessarily disagree with these principles, but they do not want that to be taken as a sign that they are supportive of the Park. There were strong views in the comments from most respondents that they do not agree with the proposals for a National Park.

51. It was felt that a detailed boundary should have been proposed and clear from the outset, as the lack of clarity and certainty around people's homes, businesses and livelihoods has caused significant stress and anxiety. Respondents said that where land belonged to an individual landowner, the presumption should be they are not within the boundary unless they choose to be.

52. Many people felt that there seemed little reasoning or logic behind the principles of drawing up a boundary, and that significant and close consultation with local communities would be needed. Careful consideration must be given to boundaries to avoid 'cutting up' farms, communities and private land. The fact this has not been given due consideration was felt by some to be evidence that farming has not been prioritised.

Question 6b: Do you have any suggestions for changes to these principles which would be specifically required for drawing up a boundary for a National Park in this part of Scotland?

53. We are not in favour of a National Park and do not think any changes were required. Of the suggestions made in our survey, the main one was that a National Park should not be designated in an area of significant agricultural production. The next was that a single proposed boundary should have been clear from the outset. Some thought that locals should have a vote on a settlement-by-settlement scale and that a National Park should not be forced upon the community.

Functions and powers of the proposed National Park Authority

Question 7: Are there any further existing functions and powers from recent legislation that would be beneficial for this Park Authority to be able to draw on and why?

54. We believe that the functions and powers that a National Park Authority is striving for can already be found within existing organisations and bodies operating in the region, including the local authority. We strongly believe that a National Park should not have statutory powers of Compulsory Purchase.

Town and country planning within the proposed National Park

Question 8a: Do you agree with the need for a bespoke approach suggested for the planning function for a National Park authority in Galloway?

Yes/Maybe/No/Don't know

55. We do not agree with the bespoke approach suggested for the planning function of a National Park in Galloway. In our survey, 54.12% of respondents said no. 18.82% said yes, 17.65% said they didn't know and 9.41% said maybe.

Question 8b: Looking at the possible options in, how do you think this should work in practice?

56. We are extremely concerned that a National Park Authority having control over planning would only lead to more difficulties, more bureaucracy and more delays within the system. This is the opposite of what is needed in the area. We do not feel that this is justified in a time of constrained public finances. Instead, planning should look to become more efficient and enabling.

57. We would prefer if planning was retained within the local authority, but that local planning departments get more resource so they can deliver the needs and aims as set out in their Local Development Plan.

58. We do believe there are opportunities for the local people and businesses of Galloway to be able to influence decisions on large-scale or significant developments. Overall, we would be concerned that that if planning was to come under the remit of the National Park Authority, that it would not benefit the farming industry and lead to extra cost, delays and regulation.

Question 8c: What alternatives should be considered and why?

59. We believe that a more efficient and streamlined planning system must be considered. Anything that adds an extra tier or layer of bureaucracy would not be acceptable to our members. We feel strongly that an unelected board of a National Park Authority should not be able to determine planning applications and should only be a consultee at best.

60. There should be a stronger focus on using existing frameworks to achieve goals. We think planning applications should be decided on by the local authority and led by the Local Development Plan.

61. However, we do recognise that the current planning system and department is overburdened and under resourced. This must be rectified. But we do not believe that a National Park would alleviate these problems.

Question 9a: Do you agree that the National Park should in principle become an access authority for its area? Yes/Maybe/No/Don't Know

62. We do not agree that the National Park should become an access authority for its area. In our survey, 70.79% of respondents said no. Only 15.73% said yes. 10.11% said maybe and 3.7% said they didn't know.

Question 9b: If not, what other options could be considered and why?

63. We think the clear option to be considered should be giving local authorities more resources to ensure they are delivering on access needs and priorities. We would also like to see other regional organisations and bodies, for example, SOSE or the South of Scotland Destination Alliance, assisting with this work. Having a National Park become an access authority would create duplication and confusion.

64. Generally, respondents to our survey were content with the current arrangements for access. They felt there was a balanced flow of tourism that did not present risk to livelihoods. Any increase in access and tourism would cause issues. The one suggestion for improvement was that local communities and people should be more involved in decision-making around access.

Question 9c: Do you agree with the suggested approach to core path planning? Yes/Maybe/No/Don't know

65. We do not agree to the suggest approach to core path planning. In our survey, 63.64% said no, while 14.77% said yes. 13.64% said they didn't know and 7.95% said maybe.

Question 9d: If not, what other options could be considered and why?

66. We believe that the current approach to core path planning was sufficient. Respondents to our survey noted that core paths were already well established and could be reviewed or adjusted under existing legislation. It was noted that the local access forum manages this well already.

67. The suggested approach to core path planning under a National Park would be a duplication. There are however some improvements that could be made to the current scheme, without necessarily requiring a National Park to implement them.

68. Firstly, the current core path initiative from the local authority could do use increased investment and maintenance. We believe that the farming and land management community should be more involved in decisions around core paths and access. There are countless issues and risks of uninhibited access to farmland, including biosecurity issues and safety of newly calved cows. These should be taken into consideration when developing core paths.

Question 9e: What are the strengths and weakness of these options for access and other fora?

69. We believe that forums for access should be driven and led by the local community. Our members believe that, at present, each area has what it needs. We feel that adding an additional layer of bureaucracy is unnecessary. Keeping access forums local allows the discussion and decision-making to be local. We are concerned that if access falls under the remit of the National Park, it will become more top-down and generic.

70. We are also concerned that creating an additional access forum within the National Park would lead to duplication and confusion. It would only lead to additional costs with little benefits.

71. We believe that the local people should be involved in decisions around access as much as possible, particularly the farming and land management community. Many are extremely concerned about the potential increase in irresponsible access users if a National Park is designated. They already face challenges associated with antisocial and at times dangerous behaviour.

72. Farmers and land managers must be supported to keep themselves and their animals safe if an increase in visitor numbers is expected, and they must be at the front and centre of discussions around access.

Question 9f: Are there any other options you would want to see considered?

73. We believe that the existing forums and organisations operating in the area should lead on this work, particularly the local authority, which has jurisdiction and budget. We think that farmers and landowners should have more autonomy over public access to their land, particularly in instances of antisocial behaviour or at sensitive times such as lambing. This is for the benefit of farming enterprises, but also the safety of the general public.

Question 10a: Do you think that the new National Park should establish its own ranger service? Yes/Maybe/No/Don't know

74. We do not think the National Park should establish its own ranger service. In our survey, 56.10% said no, while 24.39% said yes. 13.41% said they didn't know and 6.10% said maybe.

Question 10b: What are the strengths and weakness of this approach?

75. While we are not necessarily opposed to a dedicated ranger service in the region, we do not think that a National Park is required to provide it. Local authorities already have the power to create local ranger services and can guide the implementation of this dependent on local need. The creation of a National Park for the purpose of establishing a ranger service would be extremely expensive for little gain.

76. Respondents to our survey were concerned that a dedicated ranger service within a National Park would create a surplus of seasonal jobs, which in turn would place pressure on housing and accommodation during the busy tourist season. There were thoughts that a ranger service would not bring high skilled or well-paid jobs to the region. Some felt there wouldn't be enough work for a dedicated ranger service.

77. In general, we believe that while there are merits in having a dedicated ranger service to manage access issues and prevent antisocial behaviour, it would be an expense that could not be justified. We feel that it could also lead to duplication of roles that other organisations carry out, for example Forestry and Land Scotland and the RSPB.

Question 10c: Are there any other options which should be considered and why?

78. We do think some improvements could be made in terms of clearer signage for visitors and improved parking in busy areas, however we do not think there is a clear and affordable business case for full time ranger service within a National Park or otherwise. We would much rather see additional resource go to the local authority so it can deliver what is needed in the area.

Question 11a: Do you agree with these possible arrangements? Yes/In part/No/Don't know.

79. We do not agree with these possible arrangements. Only 13.58% of respondents said yes while 67.90% said no.

Question 11b: If not, what alternative approaches should be considered and why?

80. We feel that the policy and regulatory framework for planning consultation already exists, and that this question is an attempt to justify the role of a National Park in this process where it is not necessary. There are a number of statutory consultees in place for planning decisions and we do not see the additional benefit of including a National Park into this.

81. We believe the current system is sufficient as it currently stands. Bringing a National Park Authority into this process would create another layer of bureaucracy, cause duplication, and be a waste of the limited time, resource and money for no clear benefit.
82. If there were to be any changes, we believe that the local voice in these decisions should be strengthened. Farming enterprises, which make up a significant part of the region's economy, should be involved in decisions around forestry and wind farm development, as their livelihoods could be directly impacted. We believe the benefits of food production the country as a whole should be considered in the decision-making process.
83. As an additional point, some respondents to our survey felt that significant community benefit could be gained from community-owned renewable energy developments. This was seen as a good thing, but were concerned that the local area may miss out if a National Park was able to veto these opportunities.

The governance and staffing arrangements for the National Park Authority

Question 12a: Do you support these proposals for the potential size and composition of a National Park Board in the Galloway area?

Yes/Maybe/No/Don't know

84. We do not support these proposals. In our survey, 69.14% said they did not support them. 17.28% said yes, while 7.41% and 6.17% said maybe and don't know, respectively.

Question 12b: What do you think would be the advantages or disadvantages of these suggested arrangements?

85. If a National Park was to be designated, we believe that the board should be heavily weighted towards representation of local people. We do not believe that elected officials are an appropriate classification of 'local people'. The majority of those on the board should consist of those who live and work in the area, and who would understand the implications of their decisions.
86. We would like to see representation from the farming and land management community on the board. As well as this, we are of the opinion that there should be representation from those who are against a National Park.

87. We feel that the proposals focus too much on Scottish Government appointments and elected officials. We are also concerned that the suggested make up of the board is too large and unwieldy, which could lead to a lack of decision-making and hinder progress.

Question 12c: What alternative options could be considered and why?

88. The main alternative option that should be considered is that there should be no national park in Galloway. Resources should be diverted to local authorities to invest in local infrastructure and services. And existing organisations and bodies should be utilised to achieve regional and national aims.

89. If a National Park is to be designated, we believe that it should be governed by a board that is as small as possible, with the most local representatives as possible. We do not believe that local representatives should be made up of elected officials, rather, they should be normal people who live and work in the area.

90. There should be strong farming and land management representation on the board, as our industry will be significantly impacted by the designation of a National Park.

Question 13a: Should Scottish Minister appointments to the Board include expertise on nature, farming and forestry?

91. We strongly believe this should be the case. In our survey, 53.42% said yes. While 32.88% said no, it is clear from the comments that this is because they believe there should be no National Park. 6.85% equally said maybe and didn't know.

Question 13b: What other areas of expertise would the Board require, and why?

92. As above, while we do not believe a National Park is necessary, if it were to be designated, farming and land management experience is essential. This is the dominant sector in the region and therefore expertise and input from those who live and work in it is vital.

Question 14: Do you have suggestions for the topics that National Park sub-committees and advisory groups should be created for?

93. This question is difficult to answer. There are many topics and issues that require greater attention, and some have been suggested in response to our survey. But the overall sentiment is that a National Park is not required to do this.
94. In response to our survey, people suggested groups for local farming organisations, particularly nature or environmentally friendly farming. Tourism and recreation, transport and infrastructure, young people, heritage and culture, economic development, environment and energy, housing, forestry, marketing and PR, education, healthcare, retail, coastal environment, archaeology and architecture, were also all noted.
95. However, a couple of comments important to note stated that sub committees and advisory groups rarely consider the interests of those who have to live with the consequences of the decisions. Secondly, that a board should consider the greater public good and should not see themselves as delegates for one sectoral interest of geographical area.

Question 15: What steps could be taken to ensure a new National Park operated in ways which are inclusive of ethnic minorities and other protected characteristics?

96. We do not believe we can fully answer this question. We believe that existing policies and legislation should provide for this throughout the whole of Scotland and not just within a proposed National Park. Inclusivity and equality should also be factors in board governance and representation.

Question 16: Views are sought on the timing of the direct elections in respect to the selection of other elements of National Park Board.

97. We do not have strong views on this question. Despite not agreeing to the designation, we believe that the process should be universal to all national parks. We do not believe the elections should be held during public or school holiday periods. Some suggested it should be at the same time as other elections such as council or Scottish Parliament elections.
98. It is clear from our survey that people found this question confusing. Many were not sure how to answer. Several respondents were unsure of who would be allowed to vote in this process and many asked whether a vote would be held on whether there should be a National Park or not.

Question 17a: What options for using the existing public sector staff and resources to undertake the work of the National Park Authority should be considered and why?

99. Again, this question is extremely difficult to answer. We do not agree with the proposal for a National Park. One of the main reasons is that we believe the region has significant economic and social problems that need to be addressed. This is because of a lack of funding and overburdened and under resourced public sector staff. To say that these staff should be diverted from crucial work to undertake the work of the National Park Authority is wholly unacceptable.

100. At the same time, we do believe that those with local experience and knowledge should be utilised over those that have no direct interactions with the area. As well as this, if the National Park could reduce the burden on local authorities by taking over the provision of some services, for example footpath officers or rangers, then this would be more palatable.

101. However, there is no reason why staff from existing organisations could not undertake these roles without the need for a national park. Ultimately, we are concerned that if this is not properly thought through it will lead to duplication, confusion and a waste of public money.

Question 17b: Are there any benefits or drawbacks to these options which need to be considered?

102. The biggest drawback is that a National Park will divert vital resources away from other essential areas. Our members would rather see the increased funding go towards schools, hospitals and upgrading road infrastructure. As well as this, there are a number of existing organisations and bodies who could deliver on the National Park aims without the need to create a new one.

103. One such area which would be greatly affected by this proposal is planning – this is an area that is subject to many delays and already has an impact on farmers in the area. We fear that the designation of a National Park would lead to further delays and hinder the progress and development of agricultural businesses in the area.

104. Overall, at this time of an extremely constrained national budget, it is not appropriate to proceed with this designation that would bring little benefit over and above what already exists.

Question 18a: What level of staffing do you think is appropriate for the area, powers and functions and governance arrangements being considered?

105. We believe that the level of staffing that would be required to establish the National Park and then deliver on its aims would be substantial. At a time when the finances of Scotland are under intense pressure, we feel that it would be more efficient and effective to achieve these aims through existing bodies and organisations.

106. Currently in Dumfries & Galloway we have the local authority, SOSE, South of Scotland Destination Alliance and many other organisations. This is a diverse mix of organisations that, if properly funded, could deliver on all the stated aims a National Park would bring without the increased layer of bureaucracy.

107. Respondents to our survey felt that staffing of a National Park would result in people being brought in from other areas and that a ‘top heavy’ and expensive administration would be created as a result, without delivering for the people of the region.

Question 18b: What other areas of work would require further staffing and why?

108. We would like to see more resource diverted to the agriculture sector, as this is a dominant and thriving sector in the region, it should be given the investment to allow it to grow. Beyond this, if a National Park were to be designated, there would undoubtedly need to be increased resources for the emergency services if there was an upsurge of visitors to the area.

109. However, we are concerned about the cost implications of this increased resource and feel that the local population would be better serviced if the funds were diverted to existing organisations, services, and priorities.

Name of the National Park

Question 19a: Do you agree that – if designated – the National Park should be called the ‘Kingdom of Galloway National Park’?

110. We strongly disagree with this suggestion. Comments to our survey noted that Kingdom sounds extremely imperialist and implies reference to a bygone era of power and feudal systems.

Question 19b: If not, what alternatives would you suggest?

111. While we do not wish a National Park to be designated at all, respondents to our survey suggested the name would have to be dependent on the area selected. Galloway National Park was by far the most popular suggestion in our survey results.

Other issues

Question 20: Do you have any other comments you wish to make here which are relevant to the proposal?

112. As we have stated throughout this consultation period and our response, we strongly disagree with the proposals for a National Park in Galloway or anywhere else in Scotland. This is because we do not believe it would bring benefits to the farming and land management community

113. The existing national parks are not viewed by the majority of our members as having made a positive contribution to farming. Specifically, our members feel that national parks:

113.1. Will increase bureaucracy and stifle growth, innovation and development.

113.2. Will result in an increase in access-related issues. Increased visitor numbers could also price out the local population.

113.3. Bring no additional benefits over and above existing policies and legislation.

113.4. Prioritise tourism and visitor access over local farming businesses. This could be of detriment to the rural economy, as well as the natural environment.

113.5. Go against the principle of a just transition – there will be winners and losers as to who receives funding. This is inequitable.

114. Our members overwhelmingly feel that this proposal has not been well thought out, that no research has gone into the benefits for the farming sector, and that there is very little local support. As well as this, sadly, our members feel that their voices have not been heard throughout this process and that the National Park is a 'done deal' that they will have no control over.
115. We are also against the proposals due to the number of funding crises throughout the region. Farming is one of these, but so also is our schools, hospitals and road infrastructure.
116. We must however state that a small number of our members and respondents to our survey do support the concept of a National Park and believe it could bring much needed resource and investment to the area.
117. However, the vast majority of people believe that the funding for a National Park would be swallowed up by administrative costs. Using existing organisations and bodies would avoid this and enable Galloway to reach its aims more efficiently and effectively.

Question 21: Is there further evidence and information you want to provide on the potential positive or negative environmental, social and economic impacts of the proposed National Park?

118. The evidence we have is the voice of our members – local farmers, land managers and those in the community who have stated they do not want to see this park. We strongly believe that a National Park should not be forced on communities who will not see benefit from it. As it stands, our members have not seen any independent evidence that shows they will benefit from a National Park.
119. Our members have evidence and information from those living, working and farming in other National Parks, from Loch Lomond and The Trossachs to the Lake District. While these places benefit greatly from increased tourism, farming businesses and food production is suffering.
120. We feel that the pro-National Park campaigns have not been honest about the very real implications that increased tourism can bring to an area, from limiting the housing stock, pushing up property values, pricing out locals, turning the economy into a 'seasonal' one, and the low-paid and menial nature of some jobs in the industry.

121. There is the added issue of people being asked to give their views on a proposal that has not been fully fleshed out. Many aspects of a proposed Park remains to be seen and it is extremely difficult for people to understand how they will be impacted without key details of the Park's operation.
122. Overall, we do not feel that a National Park will deliver on the Scottish Government's Vision for Agriculture. Food production, as well as climate, nature and rural communities, would all be hindered if this proposed National Park was designated.