**CIfA response to NatureScot consultation – Deadline 30 November**

**The Future for National Parks in Scotland - Have your Say**

Consultation info: <https://www.nature.scot/doc/new-national-park-consultation-phase-1-scene-setting>

**Consultation questions:**

***1. Section 1 – The Role of Scotland’s National Parks***

This section examines the role of National Parks in Scotland and sets out proposals for refreshing the approach to National Parks.

At present, Scotland’s two National Parks cover 7.2% of its land area. Establishing more National Parks will increase this total, bringing Scotland more in line with others parts of the UK (for comparison, the 10 English National Parks cover 9.3% of England and the 3 Welsh National Parks cover 19.9.% of Wales). How do we enable the National Park designation to deliver more for each of these areas and Scotland as a whole?

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* The role of National Parks
* The statutory Aims of National Parks
* Powers and Functions of National Park Authorities
* Diversity in approach

***2. The Role of National Parks (Q1-4)***

Scotland has ambitious targets and priorities to meet the challenges we face in tackling the climate and nature emergencies and we need to transform what we do, and how we do it, if we are to deliver them.  Scottish Ministers wish to see Scotland’s National Parks as places that will actively demonstrate nature recovery and the transformational change needed in our approach to land-use, providing leadership and showcasing a just transition to net zero in Scotland.   
  
The establishment of one or more additional National Parks is therefore not only a goal in its own right, but must be seen in the context of a range of connected Scottish Government strategies and policies including:

* [National Strategy for Economic Transformation](https://www.gov.scot/publications/scotlands-national-strategy-economic-transformation/) – including its ambition “to demonstrate global leadership to deliver a just transition to net zero nature positive economy and rebuilding natural capital”.
* The [Environment Strategy 2020](https://www.gov.scot/publications/environment-strategy-scotland-vision-outcomes/) with its outcome that ‘Scotland’s nature is protected and restored with flourishing biodiversity and clean and healthy air, water, seas and soils’.
* Delivery of vision and outcomes of the [Scottish Biodiversity Strategy for 2030](https://consult.gov.scot/environment-forestry/scottish-biodiversity-strategy-2022/), to protect nature by 2030 and restore it by 2045 including:
  + Preventing any further species extinction and halting declines by 2030 and making significant progress in restoring the natural environment by 2045.
  + 30x30 - securing by 2030 that at least 30% of Scotland’s land and seas are managed for nature.
  + Nature Networks - ensuring every Local Authority area will have a nature network of locally driven projects to improve ecological connectivity.
  + Establishing a world leading suite of highly protected marine areas
* Commitment to meeting carbon reduction targets and adapting to climate change through implementation of the [Climate Change Action Plan](https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/pages/2/) by developing “thriving rural economies based around woodland creation, peatland restoration and biodiversity as well as sustainable tourism, food and drink and energy”;
* Delivery of Scotland’s [national planning framework](https://www.transformingplanning.scot/national-planning-framework/), [land-use strategy](https://www.gov.scot/publications/scotlands-third-land-use-strategy-2021-2026-getting-best-land/) and [national marine plan](https://www.gov.scot/publications/scotlands-national-marine-plan-9781784128555/), including the development of regional land-use partnerships and regional marine plans;
* The development of [new legislative proposals for land reform](https://www.gov.scot/publications/land-reform-net-zero-nation-consultation-paper/) including the introduction of a public interest test for transfers of large-scale landholdings;
* Implementation of Scotland’s vision for Responsible Tourism for a Sustainable Future in [Scotland Outlook 2030](https://scottishtourismalliance.co.uk/wp-content/uploads/2020/03/Scotland-Outlook-2030.pdf) and its [visitor management strategy](https://www.visitscotland.org/binaries/content/assets/dot-org/pdf/about-us/what-we-do/a-visitor-management-strategy-for-scotland.pdf); and the
* Refresh of [Our Place in Time – Scotland’s strategy for the historic environment](https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=fa088e13-8781-4fd6-9ad2-a7af00f14e30).

Scotland’s National Parks currently play a number of key roles that support many of these strategies and plans through demonstration and good practice.  In particular:

* they help protect some of the very best of Scotland’s nature, landscapes and heritage;
* they are at the forefront of landscape-scale action for nature restoration;
* they are an important part of Scotland’s visitor offer and provide a range of outstanding opportunities for outdoor recreation and enjoyment of nature;
* they are an important mechanism for land-use planning and the piloting of regional land-use partnerships; and
* they provide exemplars of community engagement and sustainable development, including natural capital approaches.

To build on this existing work and add greater emphasis to it, National Parks could be given a new overarching purpose “**to lead nature recovery and a just transition to net zero**”.  Key elements of leadership and action required in this role could include:

* Promoting the need to do things differently and at greater pace if we are to make the changes needed to address the climate and nature emergencies;
* Recognising that change is inevitable and that nature recovery should be inspired and informed by the past but not seek to simply replicate it;
* Accelerating the transition in land and marine use needed to deliver climate mitigation and adaptation and nature recovery;
* Testing and embedding natural capital approaches to growing a well-being and sustainable economy;
* Generating opportunities for greater  private investment in natural capital;
* Realising the just transition by championing reskilling and new employment opportunities to help ensure that no local community in the Park area is left behind;
* Leading on improving ways of design and place making that achieve optimum outcomes for people, nature and landscapes.

1. **Do you support "leadership of nature recovery and a just transition to net zero” becoming the overarching purpose of Scotland’s National Parks? If not, what else would you propose?**

We are concerned that Government needs to be very careful about how this is phrased. National Parks must should be leaders in nature recovery and a just transition to net zero, and this may form the top priority for activity in the Parks, but they *must* retain a statutory purpose which recognises that the reason for designation is to do with the incomparable quality of the nature, culture and landscape.

From this position, National Parks will be given the greatest influence to be leaders in nature recovery and a just transition to net zero, because the inspirational characteristics of the Parks will be able to shine through.

It is valuable and correct that nature recovery, and just transition to net zero are at the heart of all Government work, and central to the operation of planning and land management in Scotland – including in national parks – but to suggest that these things are the *overarching purpose* of National Parks is to re-write their purpose. If this was the case, Government should be searching for the area most in need of nature recovery and transition to net zero – which would like be the central belt!

National Parks represent more than places where climate or nature action is needed. These areas can act as talismans for wider societal approaches to nature recovery and climate action, but they do this because they are the areas which are *most valued for their qualities* – cultural and natural heritage, beauty, unique sense of place.

We would not support any rewriting of the statutory aims of national parks in this regard, and putting the cart (nature recovery & just transition) before the horse (natural/cultural landscape quality).

1. **Which of the proposed elements of leadership and action set out in the list above do you support? What others - if any - would you propose?**

We strongly support the recognition of ‘being informed by the past, but not simply replicating it’ this is the central plank of a progressive vision for managing heritage. Managing change in the historic environment is certainly an area that national parks can, and do, provide leadership in.

We also support National Park leadership on ‘improving ways of design and place making’ but would add cultural heritage to the list of optimum outcomes in addition to people, nature, and landscapes.

We would welcome a clear vision outlined in Government policy for how National Park leadership is intended to provide a best practice approach to influence wider spatial policies in other areas. For example, biodiversity net gain and cultural heritage conservation needs exist outside the boundaries of designated landscapes. We would welcome the view that enhanced protections and management was seen as an example to wider areas, not as a privilege reserved only for these ‘special’ places.

1. **What opportunities are there for National Parks to generate private investment in natural capital?**
2. **What role should local communities play in the National Park and how should National Park authorities work with and for them to secure a just transition?**

**The role of National Parks (continued) (Q5-7)**

A national statement that sets out the Scottish “vision and mission” for National Parks could be useful to provide further clarity on the role of National Parks and to promote their work more widely.

1. **Do you support a “vision and mission” for all of Scotland’s National Parks being clearly set out in a national statement? If not why not?**

Yes. We would welcome a vision and mission set out in a national statement. This would be an opportunity to improve understanding of the statutory and management aims of national parks and discuss the approach to achieving public benefit through their operation. The statement should cover cultural heritage, tourism, archaeological and landscape value, and a thorough approach to public benefit delivery.

1. **If you favour a national statement for Scotland’s National Parks being developed, what else should it cover?**

A national statement would be an opportunity to improve understanding of the statutory and management aims of national parks and discuss the approach to achieving public benefit through their operation. The statement should cover cultural heritage, tourism, archaeological and landscape value, and a thorough approach to public benefit delivery.

1. **To what extent should new National Parks be about the future potential of an area for nature restoration as well as what’s currently in place**

We agree that management of National Parks should be about both the present landscape (including the value attached to that which is inherited from the past), and the future.

**4. The Statutory Aims of National Parks (Q8-10)**

*National Park Aims are to:*

* *conserve and enhance the natural and cultural heritage of the area;*
* *promote the sustainable use of the natural resources of the area;*
* *promote understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area; and*
* *promote the sustainable social and economic development of the area’s communities.*

*Where  
“natural heritage” includes the flora and fauna of a National Park or a proposed National Park, its geological and physiographical features and its natural beauty and amenity.  
“cultural heritage” includes structures and other remains resulting from human activity of all periods, language, traditions, ways of life and the historic, artistic and literary associations of people, places and landscapes.  
  
Section 9 (6) - In exercising its functions a National Park authority must act with a view to accomplishing the purpose set out in subsection (1); but if, in relation to any matter, it appears to the authority that there is a conflict between the National Park aim set out in section 1(a) and other National Park aims, the authority must give greater weight to the aim set out in section 1(a).* ***National Parks (Scotland) Act 2000***

There should naturally be a close relationship between the “vision and mission” of National Parks and the statutory Aims of National Parks provided in the Act.  In covering environment, social and economic dimensions, the four statutory Park Aims currently provide the basis for Scotland’s integrated approach to National Parks.  While none explicitly refers to it, the Aims also enable National Parks to contribute to nature recovery and a just transition to net zero.  
  
Definitions of both the natural and cultural heritage are provided by the Act.  The latter was developed before [Our Place in Time, Scotland’s strategy for the historic environment](https://www.gov.scot/publications/place-time-historic-environment-strategy-scotland/), was written.  Further consideration may be needed on whether this definition should be updated to reflect this strategy and its implementation as well as experience of its application within National Parks.  
  
The National Park Authority is required to take forward each of the Aims in a joined-up way unless this is likely to lead to the detrimental loss of the natural heritage and cultural heritage of the area at which point it must give “greater weight” to this first Aim.  This “balancing duty” is essential to the protected area function of Scotland’s National Parks.  
  
While the current legislative approach has generally been seen as successful, a number of changes to these statutory Aims could be considered to further strengthen the focus and contribution of National Parks. Some of the possible broad options include:

1. retaining the current status quo e.g. keeping the existing four Aims as currently worded;
2. keeping the policy intention of each Aim unchanged but rewording them to better reflect the new vision and mission in the proposed national statement;
3. keeping the four Aims but include a new overarching statutory purpose of National Parks to secure nature recovery and a just transition to net zero;
4. adding additional aims e.g. “to promote the just transition to net zero” or “to  increase the accessibility of the areas for all”; and
5. reducing the Aims to the first one only and change the other three Aims to duties, thus giving the National Park a much stronger, single statutory focus on the protection and enhancement of the natural and cultural heritage.
6. **Are any specific changes to the existing four Aims required? If so why, and what are they?**

As a minimum, we believe that the current four aims are serviceable and do not need change. However, there is scope for aims to be updated to take account of enhanced principles of heritage management, which better articulate the existing ‘special qualities’. For example, to include reference to concepts such as ‘cultural significance’ and ‘public benefit’.

1. **Which of these possible options, or mix of possible options, do you think would help strengthen the focus and contribution of National Parks, and why?**

We would support option 1, or 2, subject to detailed consideration of any proposed rewording.

As stated above, we would be concerned with option 3, which we feel would undermine the existing core reason for designation of national parks, which should be led by the ‘special qualities’ of the natural and cultural heritage, and not by the operational processes which result in improvements to those landscapes. These instrumental benefits (such as promoting nature recovery and climate adaptation) are rightly to be considered priority work for National Parks, but this is *because* of the inherent landscape quality and public values vested within them, and not the other way around.

We do not fully understand what impact option 4 may have, but do not see why this would result in any benefit.

1. **Are there other options that could be considered? If so, what are they?**

**The Statutory Aims of National Parks (continued) (Q11-12)**

Other public bodies are also bound by these statutory Aims when they are exercising functions within a National Park through the duty on them “to have regard” to the Park Plan.

*Section 14 - The Scottish Ministers, a National Park authority, a local authority and any other public body or office-holder must, in exercising functions so far as affecting a National Park, have regard to the National Park Plan as adopted under section 12(7)(a).*

This wording does not itself require action by public bodies. While the track record of partnership working by public bodies in National Parks is strong, issues can arise between policy objectives which may slow or block delivery of the Park Plan. To address this, there may be a need to strengthen the effect of this duty so that public bodies exercising functions within a National Park are required to positively support delivery of National Parks Plans.

1. **Do you think there should be any changes to the wording in the Act to require public bodies to support delivery of National Park Plans? If so, what would you propose?**

N/A

1. **Do you have any other suggestions for improving partnership working to support the implementation of the National Park Plan by all?**

N/A

**Powers and Functions of National Park Authorities (Q13-14)**

At present, the Act provides the following powers and functions to all National Park Authorities These include:

* general powers of non-departmental government bodies (charges, advice, research, grant-aid; land acquisition and compulsory purchase etc.);
* natural heritage functions of local authorities and NatureScot (for example for countryside management, ranger provision, nature reserves, compulsory purchase and grants etc.); and the
* planning and access authority functions of local authorities.

Through the designation order, these powers and functions can be further specified to meet the needs and circumstances of the area.

All National Park Authorities also have general powers to make bylaws and management rules in relation to the achievement of the National Park aims. While not yet used, the legislation also contains unique powers for Scottish Ministers and public bodies to transfer their functions and powers to a Park body and vice versa.

1. **Could any of the existing powers and functions be used more effectively? If so, which ones and how?**

N/A

1. **Are any of the existing powers or functions redundant or unnecessary? If so, which ones and why?**

N/A

**Powers and Functions of National Park Authorities (continued) (Q15-16)**

To take forward a refreshed “vision and mission”, National Park Authorities may require strengthened or new powers and functions in relation to the following areas

* Improving protection, enhancement and enjoyment of nature
* Delivering Net Zero
* Better management of land or sea
* Funding
* Community well-being and development

1. **What, if any, changes to the powers and functions in these areas should be considered and why?**

N/A

1. **Are there any other areas where strengthened or new powers and functions will be needed by the National Park Authority? If so, what are they?**

N/A

**Diversity in approach (Q17-18)**

In thinking about powers and functions, a key question is the extent to which we want all our National Parks Authorities to be similar. Consideration may also be needed in relation to their governance and management. It could be that a new National Park Authority will need to be similar to the existing ones. Alternatively, very different approaches could be developed though bespoke arrangements set out in the individual designation order for each new National Park Authority which reflect the needs and geography of its area and its administration.

Any changes to the statutory Aims of National Parks and the powers, functions and governance of National Park Authorities will require amendments to the legislation and will be the subject of further consultation by the Scottish Government.

1. **Should the powers and functions of National Park Authorities be decided on a Park by Park basis? Should any apply to all National Park Authorities? If so, which ones and why?**

We believe that there should be a core basis for all national parks, such that they are at least designated on the same range of special qualities. There should be, at least, a shared vision and mission to articulate this. However, ‘quality’ in cultural and natural heritage may look very different from place to place, and we would welcome discussion of areas of urban or semi-urban landscape, and marine and coastal land/seascapes as areas for consideration for special qualities.

It is possible that, Parks designated based on a wider interpretation of ‘special qualities’ may not all require the same approach to governance and management. We would welcome discussion of creative approaches to the management of, for example, smaller Park areas, or marine and coastal Park areas, via different structural arrangements, or fulfilling different responsibilities, and maintaining different relationships.

What we would like to avoid would be any approach that designated National Parks in name only, where many of the ‘additional’ responsibilities of NPAs were not fulfilled. This would reduce the opportunities for benefit and potentially shirk responsibilities to manage additional pressures.

1. **Are there any changes you would want to see to the governance and management arrangements of all National Park Authorities?**

We would like to see any new parks employing archaeological advisors, as most other UK National parks outside of Scotland do. Such expertise is necessary to ensure sustainable management of archaeological resources in the Park area, to unlock opportunities for public benefit, and to engage with wider work in the Park such as peatland restoration, forestry, and development management stakeholders as well as the public, to ensure positive management of the heritage resource.

**Section 2 – Criteria for selecting National Parks**

**This section considers the issues that need to be addressed in selecting new National Parks.  While NatureScot has been asked to provide advice on how it should be done and what it should comprise, the Scottish Government will lead the development of the evaluation framework and the nomination process itself.**  
  
**Contents**

* Developing a nomination process for National Parks
* Criteria for nomination and evaluation
  + Outstanding national importance
  + Size and coherence
  + Need or added-value
  + Degree of support
  + Strategic contribution
* Selection Criteria – other issues

Scottish Ministers have committed themselves to an open, transparent and bottom-up nomination process for selecting new National Park areas rather than the traditional expert-led, top-down approach.  This fits well with new thinking about “co-production” in protected areas approaches, conservation practice and public policy more generally.    
  
Key elements of the approach envisaged by Scottish Ministers include:

* Development and publication of an evaluation framework to assess nominations;
* A request for nominations to be made with clear guidance and within a timeframe that encourages nominations from all parts of Scotland;
* The provision of advice and other support for potential areas to prepare nominations;
* An open and transparent evaluation of the nominations based on the agreed framework;
* Decisions on which area or areas to progress made by Scottish Ministers based on recommendations following this evaluation.

1. **Are these the key elements of an effective nomination process for National Parks in Scotland?**

Yes. We support the process as outlined.

1. **Do you have suggestions for improving any of the specific elements of the process?**

N/A

1. **Are there additional elements you want to see included, and if so, what are these?**

N/A

**Criteria for nomination and evaluation**

**Questions 22-37 (on the following pages) seek views on possible criteria against which nominations for new National Parks could be evaluated.**Possible criteria that could be included in the Evaluation Framework are as follows

1. What are the special qualities of the area that merits its designation as a National Park? (“Outstanding national value”)
2. Does the area proposed make sense as a National Park? (“Size and coherence”)
3. How would establishing a new Park help deliver nature recovery and a just transition to net zero in this area? (“Need or added value”)
4. Is the investment in creating a new National Park Authority for this area justified in terms of these outcomes, or are existing approaches sufficient? (“Need or added value”)
5. Is there sufficient evidence of local support for this proposal to be considered further? (“Degree of support”)
6. Would the designation of the area increase the impact of Scotland’s National Parks as a whole? (“Strategic contribution”)

For each of these criteria, a number of components are suggested that could be expanded on as part of the nomination and reviewed as part of the evaluation processes.  Further consideration is needed on how far we try to quantify these components or whether they should be left more open-ended. (“Other issues”).

**Outstanding National Importance (Q22-23)**

i. What are the special qualities of the area that merits its designation as a National Park?

Possible components

* Value for biodiversity, landscape and cultural heritage
* Value for enjoyment and understanding
* Value of natural capital assets
* Inclusion of associated marine areas and islands where relevant

This criterion directly reflects one of the conditions in the existing National Parks legislation.  
  
In terms of international practice, a strong case can be made for having a suite of National Parks that either include “the best of Scotland’s nature and landscape” or are representative of “all of Scotland’s nature and landscape”.    
  
The existing legislative conditions in the Act refer to “natural and cultural heritage” and it also therefore remains an important consideration in thinking about future National Parks.  
  
While outstanding value is strongly linked to international practice in National Parks and should be so in Scotland, we may also want to consider the potential for nature recovery and a just transition to net zero in any area that is nominated.

1. **Do you agree that outstanding national importance should be a criterion? Could the clarity of it be improved and, if so, how?**

Yes. We agree that this should be the key criterion. We would welcome additional guidance, or an expanded definition in legislation that linked outstanding national importance to cultural and natural heritage, and helped people to scope what this means to them. We strongly welcome a co-production approach to gathering public views on what makes a landscape important and a definition of heritage that is able to incorporate the things that matter to people. The historic environment sector has worked with the Scottish public to develop broad understandings for the nation’s cultural heritage in the past which could be drawn upon for this purpose.

1. **Do you agree with the proposed components? Are any components missing and, if so, what are they?**

Yes, we agree with the proposed components.

**Size and coherence (Q24-25)**

ii. Is the proposed geographic area likely to make sense as a National Park?  
  
Possible components

* A definable geographic area including, where relevant, associated settlements
* Shared heritage, cultural associations and traditions
* A size which allows for the delivery of Park aims
* An area in which the special qualities of the Park as a whole would not be undermined by more intensive land or sea uses or large scale infrastructure that exist within, or are proposed for, the area

This criterion directly reflects one of the conditions in the National Parks legislation.  
  
National Parks are normally contiguous, discrete areas with shared heritage, cultural associations and traditions.  Smaller settlements can be included.  There may also be additional considerations in terms of defining the marine extent of an area where this applies.  
  
In thinking about the area, a central question is whether the area is in practice too small or too large for consideration as a National Park.  Another key factor may be the extent to which intensive land or sea uses or large-scale infrastructure which detract from the special qualities of the area are included or excluded.

1. **Do you agree with size and coherence as a criterion? Could the clarity of it be improved and, if so, how?**

We suspect that there will be various size criterion that may be important to consider. However, a distinction should be made between physical/geographical factors and administrative ones, such as having a critical mass of expertise to administer and undertake work in National Parks. This could, potentially, be mitigated by having the ability to be flexible with governance or management structures.

Landscape coherence in respect of issues such as historic and archaeological character, should be important considerations. However, it may not be possible to precisely identify coherent cultural heritage landscapes, nor to map these entirely onto coherent natural landscapes, and this should not be a reason not to designate an area.

Ultimately, we do not think that size or coherence will likely be a deciding criterion.

1. **Do you agree with the proposed components? Are any components missing and, if so, what are they?**

Yes, we agree with the proposed components.

**Need or Added-Value (Q26-27)**

These two criteria directly reflect one of the conditions in the National Parks legislation.

iii. How would establishing a new Park help deliver nature recovery and a just transition to net zero in this area?  
  
Possible components  
  
Are there existing issues and/or future opportunities for

* nature restoration?
* transforming land or sea use to contribute to net zero?
* Improving accessibility to nature for all?
* provision of sustainable transport options?
* better visitor and tourism management?
* growing the well-being economy by increasing natural capital, creating nature-based skills and jobs and supporting community capacity and development?

If our ambition for National Parks is to provide leadership and practical action to demonstrate nature recovery and a just transition to net zero, the potential for this should provide a key basis for evaluation of new National Parks.  Further consideration will be needed on the “information” or “measures” that could be used to make the case for this.

1. **Do you support the consideration of the potential contribution of the National Park in delivering nature recovery and a just transition to net zero as criterion? Could the clarity of it be improved and, if so, how?**

We support this proposed consideration, but would add cultural heritage to the criterion as well. While we fully expect that the potential for nature recovery and net zero would be critical considerations in the designation of many proposed areas, we would like the opportunity for cultural heritage to be able to be considered as well. This would be particularly relevant to the proposed criterion for better visitor and tourism management. It may also be a more relevant issue in the case of considerations of urban or semiurban national park areas.

1. **Do you agree with the proposed components? Are any components missing and, if so, what are they?**

As stated above, we would broaden the criterion to explicitly include cultural heritage.

**Need or Added-Value (continued) (Q28-29)**

iv. Is the investment in creating a new National Park Authority for this area justified in terms of these outcomes, or are existing or other approaches sufficient?  
  
Possible components

* Weaknesses or limitations of existing measures
* Costs of existing measures

The Act also requires a dedicated National Park Authority to be created, so a key judgement to be reached is whether the issues and opportunities in an area merit this, over and above other mechanisms or approaches.

1. **Do you support the assessment of the merits of a National Park compared to existing or other approaches as a criterion? Could the clarity of it be improved and, if so, how?**

Yes.

1. **Do you agree with the proposed components? Are any components missing and, if so, what are they?**

Yes.

**Degree of Support (Q30-31)**

v. Is there sufficient evidence of local support for this proposal to be considered?  
  
Possible components

* Support by local community or group
* Support by local authority/fit with local authority policy
* Indication of national support/fit with national policy

The degrees of local and national support for a National Park in both Loch Lomond and the Trossachs and the Cairngorms was assessed by the reporter during the statutory designation process.  This was tested again during the consultation and Parliamentary scrutiny of the Designation Order.  The need for this assessment remains for future statutory proposals, suggesting that the non-statutory evaluation framework should also include some consideration of this issue to allow Ministers to have confidence that a statutory proposal they issue has the best chance of leading to designation.  As well as the level of support, who is supporting the nomination is also important – be it local authorities, communities, land-owners or other key stakeholders.  How this is best captured in the framework and expressed in nominations will need careful consideration

1. **Do you support the consideration of existing support as a criterion? Could the clarity of it be improved?**

Yes.

1. **Do you agree with the proposed components? Are any components missing and, if so, what are they?**

Yes.

**Strategic Contribution (Q32-33)**

vi. Would the designation of the area increase the impact of Scotland’s National Parks as a whole?  
  
Possible components

* An area that could provide an opportunity to develop and test different approaches to nature recovery in a way that supports a just transition
* An area which contributes to the delivery of 30x30 commitment
* An area which supports Scotland’s strategic approach to visitor management
* An area where the sustainable social and economic development of its communities, that a National Park could help support, is of strategic importance

A key role for National Parks is as exemplars of management and good practice.  Do we want to increase the relevance of this role by selecting a range of areas that cover the issues and opportunities that come from the different landscapes and seascapes that Scotland has?

1. **Do you support the assessment of the strategic contribution of an area as a criterion? Could the clarity of it be improved?**
2. **Do you agree with the proposed components? Are any components missing and, if so, what are they?**

**Selection Criteria (other issues) (Q34-37)**

Further work is needed in developing these criteria as part of the guidance for nominees but a key consideration will be keeping this as short and as simple as possible.

1. **Are there any significant issues that are not covered by the proposed criteria? If so, what are they?**
2. **Do you think any of the criteria are more important than others? If so, which ones and why?**
3. **Do you think the selection criteria and proposed components provide the right balance between covering the issues required and simplicity? If not, how could they be improved?**
4. **Should more of the proposed components be quantifiable? If so, which ones, and how?**

**Section 3 – Other issues and respondent information (Q38)**

**This final section covers other issues and respondent information**

This consultation has focused on proposals for the role, powers and functions of National Park Authorities and the criteria for selecting new National Park areas. Future consultations from Scottish Government will follow, seeking views on the detail of any legislative changes Ministers consider are required and on a draft evaluation framework for selecting new National Parks. Following the finalisation of this evaluation framework, a call for nominations for specific areas will then be issued by Scottish Ministers.

1. **Are there any other issues about either Scotland’s approach to National Parks or the selection of new National Parks you would like to raise in your response at this stage?**