

New National Parks - appraisal framework

04/August/2023

Built Environment Forum Scotland (BEFS) is an umbrella body for organisations working in the built environment in Scotland. Drawing on extensive expertise in a membership-led forum, BEFS informs, debates and advocates on the strategic issues, opportunities and challenges facing Scotland's existing built environment. BEFS is a supporting member of the [Climate Heritage Network](#).

Other relevant consultation responses from BEFS can be seen below, as many issues overlap and demand associative consideration:

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STAKEHOLDER CONSULTATION ON THE SELECTION CRITERIA AND APPROACH TO NATIONAL PARKS IN SCOTLAND **(30/11/22)**

This consultation from NatureScot is part of the commitment from Scottish Ministers to establish at least one new National Park by 2026. Exploring the contribution of the historic environment and cultural heritage to the role and approach of National Parks is welcomed and felt to be vital; embedding heritage where appropriate and ensuring that existing considerations are maintained and enhanced should be a key concern.

BEFS response:

Criterion 1 - outstanding national importance

Is the area of outstanding national importance because of its natural heritage or the combination of its natural and cultural heritage?

Component 1

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

Component 2

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

Question 1

Do you agree that 'outstanding national importance' should be a criterion for assessing nominations for new National Parks?

Agree

Question 2

Do you agree with the components of criterion 1 (outstanding national importance)?

Component 1: Agree

Component 2: Agree

BEFS welcomes the inclusion of cultural heritage and the historic environment as components for Criterion 1, however would suggest that the presenting cultural heritage and natural heritage as separate criterion

could undermine the fundamentally interconnected nature of the two. As such we would here reiterate comments made during the consultation on Stakeholder consultation on the Selection Criteria and Approach to National Parks in Scotland, linked above.

'Exploring the contribution of the historic environment and cultural heritage to the role and approach of National Parks moving forward is welcomed and felt to be vital; embedding heritage where appropriate and ensuring that existing considerations are maintained and enhanced should be a key concern.'

BEFS considers it essential that the symbiotic nature of the existing historic (including the built environment) and the natural environment is recognised and fully integrated within this new approach. BEFS would further seek clarity within these definitions around the use of 'cultural heritage' vs 'historic environment'. In defining cultural heritage this could be addressed, and BEFS would suggest the need for new and updated designation criteria to speak the same language seen throughout the existing policy landscape'

[Our Past, Our Future](#), Scotland's new strategy for the historic environment describes this relationship:

'The historic environment is part of our everyday lives. It provides character to our landscapes, strengthens and enhances our local communities, and helps to forge a sense of place.'

The historic environment is a physical thing; whether that's a building, monument, site, or landscape; above or underground, or underwater. It can be culturally significant, and integral to our understanding of the past and the people whose lives came before ours; or perform a more functional role through providing a home, workplace, public park, farmland, or hospital. The historic environment can create spaces for recreation, leisure, tourism, and education, or places for nature to thrive...

While the historic environment is the main area of focus in this strategy, it's just one part of Scotland's heritage. The historic environment sits alongside the material culture left to us as museum, gallery, and archive collections; the intangible heritage of stories, traditions, rituals, crafts, customs, music, and poetry; and our natural heritage: the diversity of life we share our planet with, shaped by millennia of interaction with human societies and billions of years of evolution...

... Our country's landscapes, woodlands, and marine environments have been shaped by centuries of human occupation, management, and design'

Criterion 2 - size, character and coherence

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

Component 1

Does the proposed area have a distinctive character and coherent identity?

Component 2

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

Question 3

Do you agree that 'size, character and coherence' should be a criterion for assessing nominations for new National Parks?

Agree

Question 4

Do you agree with the components of criterion 2 (size, character and coherence)?

Component 1: Agree

Component 2: Don't know

Criterion 3 - meeting the special needs of the area

How would designating the area as a National Park meet the special needs of the area? What difference would National Park designation make to the area for nature restoration, cultural heritage, sustainable use of natural resources, public enjoyment and sustainable communities?

Component 1

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

Component 2

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

Component 3

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

Component 4

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

Component 5

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

Question 5

Do you agree that 'meeting the special needs of the area' should be a criterion for assessing nominations for new National Parks?

Agree

Question 6

Do you agree with the components of criterion 3 (meeting the special needs of the area)?

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Component 1: Agree

Component 2: Agree

Component 3: Agree

Component 4: Agree

Component 5: Agree

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Criterion 4 - visitor management and experience

How would designating the area as a National Park support visitor management and the area's offer for education, recreation and enjoyment by all of Scotland's people?

Component 1

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

Component 2

How would National Park designation support visitor management in the area?

Component 3

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

Component 4

How could National Park designation support access to nature for Scotland's people?

Question 7

Do you agree that 'visitor management and experience' should be a criterion for assessing nominations for new National Parks?

Agree

Question 8

Do you agree with the components of criterion 4 (visitor management and experience)?

Component 1: Agree

Component 2: Agree

Component 3: Agree

Component 4: Agree

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Criterion 5 – added value

Why is the investment required to create and operate a new National Park for this area justified?

Component 1

How would the benefits of a National Park in the area justify the investment required?

Component 2

What is the added value that National Park designation would bring to the area?

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Question 9

Do you agree that 'added value' should be a criterion for assessing nominations for new National Parks?

Agree

Question 10

Do you agree with the components of criterion 5 (added value)?

Component 1: Agree

Component 2: Agree

Criterion 6 - local support

Is there sufficient evidence of local support for this proposal?

Component 1

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

Component 2

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

Question 11

Do you agree that 'local support' should be a criterion for assessing nominations for new National Parks?

Agree

Question 12

Do you agree with the components of criterion 6 (local support)?

Component 1: Agree

Component 2: Agree

BEFS broadly agrees with the components above but would note that evidence of local support and understanding of the impact of successfully acquiring National Park status, as well as consideration of any unintended consequences is likely to vary from application to application depending on resource and capacity of the applicants, as well as that of the local authority. To ensure thorough and meaningful engagement can take place and for the benefits/impacts are fully understood, the appropriate guidance and support will need to be in place.

Criterion 7 - strategic contribution

Would the designation of the area bring benefits to Scotland as a whole and contribute to strategic priorities including nature restoration, climate mitigation and adaptation action, green investment, skills and jobs and nature friendly farming?

Component 1

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

Component 2

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

Component 3

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

Component 4

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

Component 5

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

Question 13

Do you agree that 'strategic contribution' should be a criterion for assessing nominations for new National Parks?

Agree

Question 14

Do you agree with the components of criterion 7 (strategic importance)?

Component 1: Don't know

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Component 2: Don't know

Component 3: Don't know

Component 4: Agree

Component 5: Don't know

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If you disagree, please give reasons for your answer.

BEFS agrees that strategic contribution should be a criterion but would argue that for a full and holistic strategic approach to be realised, the components should explicitly recognise the benefits of cultural heritage and the historic environment, towards net zero, Scotland's climate targets and National Performance Framework (for example) as part of a National Park's assets; failure to do this is an oversight and missed opportunity.

Question 15

Once finalised, the appraisal framework will include details of how each criterion will be scored. This will be published ahead of the nominations process being launched. Do you have any comments that you would like to make about how the selection criteria should be scored?

BEFS welcomes the intention that scoring of the criterion is transparent process and hopes that any framework will take into account the nuances and identity of each proposal/area.

Question 16

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

BEFS continues to emphasise that culture/heritage/nature policy areas substantially overlap, especially in relation to net-zero goals and as such advocates for clear and full integration within the existing policy landscape.

BEFS responses to a number of Consultations in relation to the Built Environment can be found at:
<https://www.befs.org.uk/resources/consultations/>

RESPONDENT INFORMATION

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The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference: **Publish response with name**

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise? **YES**

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