

250618 (173) FOI National Park

From: [Freedom of Information](#)
To: [REDACTED]
Cc: [Freedom of Information](#)
Subject: Freedom of Information Request
Date: 18 June 2025 11:36:46
Attachments: [REDACTED]

Dear [REDACTED]

Thank you for your Freedom of Information request of 9 June 2025. We are responding to you under the Freedom of Information (Scotland) Act 2002.

FOI REQUEST (9 June 2025)

I am looking for the SOSE response to the NatureScot consultation on the proposed new National Park in South West Scotland. I have searched your website but can't find this so would like to request a copy.

RESPONSE

SOSE's response to the NatureScot consultation on the proposed new National Park is attached (Appendix A).

You have the right to request a review of the way in which this request has been processed. Should you wish to exercise this right, you will need to contact us within 40 working days of receipt of this email.

If you remain dissatisfied on completion of the review, you have the right to appeal to the Office of the Scottish Information Commissioner and thereafter to the Court of Session on a point of law only:

Scottish Information Commissioner
Kinburn Castle
Doubledykes Road
St Andrews
Fife
KY16 9DS
Telephone: 01334 464610

www.foi.scot

or for online appeals:

www.foi.scot/appeal

Regards,
SOSE Corporate Relations Team
FOI@sose.scot



www.southofscotlandenterprise.com

CONSULTATION PAPER – PROPOSED NATIONAL PARK IN GALLOWAY – SOSE’S RESPONSE

SOSE

1. South of Scotland Enterprise welcomes the opportunity to contribute to the consultation on a proposed National Park in Galloway.
2. As Scotland’s newest economic development agency, we support people, communities and enterprises across our region to thrive and grow and meet their potential. The regional focus provides a clear point of access and expertise for those wanting to invest, locate and live in the South of Scotland. With our focus on people, planet and place, we drive activity that will deliver the rural powerhouse that the region can be.
3. In our response we set out an approach that we believe could best meet the needs of the region, in a way that builds and invests in its recognised strengths, has immediate positive impact on enhancing our environment and economy, and is driven forward in partnership, collaboration and trust.

OVERVIEW

4. The South of Scotland is a region of unrivalled natural capital, partnership working and opportunity. The region also benefits from a range of international, national and regional designations that have been shaped by its natural capital assets. The region is focused on work to unlock those assets to drive opportunity and to help tackle fundamental challenges, including depopulation, those associated with rurality as well as the seasonality of our visitor offer.
5. Rather than creating a new structure, SOSE believes there is an alternative and innovative approach that looks to build and invest in what is already working, maximising the social, environmental and economic impact to deliver growth and benefit nature. Central to this approach is our Natural Capital Innovation Zone and the Galloway and Southern Ayrshire UNESCO Biosphere.
6. Our response outlines this innovative approach. The practicalities of how this could best be taken forward needs to be developed by those operating in the South of Scotland, drawing on the insight and perspectives that have come from this consultation. But there is a unique opportunity now for the region to come together, to shape collaboratively this innovative approach, developing and delivering a beacon of inspiration for Scotland’s wellbeing economy.

THE POTENTIAL FOR A DIFFERENT APPROACH

7. The South of Scotland is recognised for its natural capital and is committed to an innovative approach to unlocking the social, environmental and economic opportunities which that capital provides. Key to this approach are:
 - **Natural Capital Innovation Zone (NCIZ)** – a nationally recognised and groundbreaking initiative. Designed to protect and enhance nature while unlocking new opportunities for economic development, innovation, and community benefits, it provides a framework for collaboration and co-ordination across the region.

- **Galloway and Southern Ayrshire UNESCO Biosphere (GSAB)** – Scotland’s first UNESCO designated Biosphere, operating for over 12 years, re-accredited and expanded in 2023 and applauded by UNESCO as a world class exemplar
 - **Regional Land Use Partnership and Land Use Framework (RLUF)** – the only partnership in Scotland that has successfully produced a land use framework, working through collaboration and embedded in the work of our Regional Economic Partnership
 - **Borderlands Natural Capital Programme** – the only regional growth deal in the UK to include a natural capital programme, with projects that support new and innovative ways of delivering environmental, economic development and land use planning and management benefits whilst promoting developing inward investment opportunities
 - **“Scotland Starts Here – a responsible Tourism Strategy”** – developed and delivered in partnership, including businesses and the public sector, to increase visitors to the region in a sustainable way.
8. The debate on a new National Park comes at a time when there are other critical changes being made, impacting on rural economies, including the way in which we support agriculture. The Agricultural and Rural Communities (Scotland) Bill 2024 made provision enabling the support of agriculture, rural communities and the rural economy through the creation of a framework for that support, with details set out in the Agricultural Reform route map. Other legislation is also changing with the Natural Environment Bill due to be introduced, establishing the framework for statutory targets to restore and protect nature and including provisions to modernise the way in which National Parks are managed.
9. The debate on whether or not to designate an area of Dumfries and Galloway and Southern Ayrshire as a National Park has polarised opinion. The consultation has shown diverse and strongly held views, that has split the local population, creating discord and distrust. Unfortunately, the structure of the reporter consultation process has not enabled or prompted people to consider alternatives.
10. Against that background of strong regional partnerships, new approaches and a polarised debate, we believe there is opportunity to shape something new and different. This approach will learn from the consultation and different perspectives offered, delivering the benefits of a National Park, but uniquely of the South of Scotland and shaped by its people. Bringing those strands together, with refreshed commitment and new funding arrangements would deliver greater and quicker impact in an efficient and effective way.
11. At the centre of this new approach is the South of Scotland NCIZ which is leading the way in demonstrating and creating economic growth from natural capital. Through the collaboration of partners across the region, the NCIZ helps to further natural capital opportunities, to attract responsible investment and drives innovation to benefit the region and the rest of Scotland. It provides a “wrapper” that weaves together our opportunities and partnerships. Supporting and investing in the work of GSAB would then provide a geographic focus for the NCIZ, exploring opportunities at a landscape scale that can then be shared across the NCIZ as a whole, and beyond.

URGENCY OF ACTION

12. The urgency of tackling environmental and social challenges has never been greater. The NCIZ is an initiative that is already in place, providing a framework for sustainable development that benefits the economy, the environment and communities.
13. The establishment of a new National Park – a public body that needs further parliamentary process to establish – would take significant time and money to deliver. Should designation of a new National Park be supported, the legislative requirements mean that a legal designation of a new area (following further public consultation and parliamentary approval) would, at the very earliest estimate be Spring 2026¹ in the timetable set out on NatureScot's website). Following that there would need to be a process to appoint a chair, a board, and a chief executive and develop a National Park Plan. That would make it difficult for a New National Park to contribute meaningfully to the delivery of Scotland's Biodiversity Strategy.
14. Rather than a new body, our proposal focuses on investing that time and resource in existing structures and partnerships, avoiding the risks of duplication or misalignment. The NCIZ and other regional initiatives are currently working successfully across partners with very different views about a National Park. Many challenges have been addressed through innovative management practices for land and marine resources and the use of participatory rather than regulatory processes.
15. The challenges we face in the South are complex and unique to our rural landscape. To address them, we need to work collaboratively and swiftly with a shared purpose and identify. That is set out in the Regional Economic Partnership's commitment to a "Green, Fair and Flourishing Region" with the range of aligned partnerships already working to deliver impact in the region.

SCOTLAND'S NATURAL CAPITAL INNOVATION ZONE

16. The NCIZ is a pioneering initiative aimed at leveraging the South of Scotland's rich natural capital assets, strong delivery partnerships and entrepreneurial and innovative mindset to unify and progress the region. Its newness means it is currently unfamiliar but has massive potential to create a unique identity for our region, as a brand of innovation and entrepreneurial activity to build confidence and pride. The region could maximise the impact of this brand.
17. Our natural capital assets support and underpin our businesses and communities and play a key part in helping us adapt to the effects of climate change. By working with nature, we ensure the region's sustainability and growth, driving economic development, entrepreneurial activity, innovation, community wealth building as well as enhancing those natural capital assets for long term resilience.
18. Through establishing the South of Scotland as a 'living lab and learning hub' it allows the region to act as a resource to share knowledge across the whole of Scotland and beyond. Critically, this positions Scotland back in its leadership role in delivering the cultural shift required for a nature and climate positive future.

¹ [National Parks | NatureScot](#)

19. The NCIZ is an alternative way of delivering the aims and objectives of the National Park – more immediately and outwith the polarised debate. Focusing on protecting and enhancing natural assets, promoting biodiversity, and supporting carbon sequestration, whilst facilitating inward investment and entrepreneurial activity to develop new market opportunities it presents a working example of the Wellbeing Economy.
20. By acting as a living lab and learning hub, the NCIZ ensures effective knowledge transfer and the creation of scalable, shareable, and sustainable solutions, leveraging existing systems, processes, and partnerships which will strengthen and evolve over time. Collaboration and co-creation are key to the success of this initiative so the NCIZ will align with national, regional and local ambitions. It will ensure that communities and key areas of the South of Scotland economy – including agriculture, forestry and tourism – are actively involved.

Delivering national objectives regionally

21. The NCIZ aligns with Scottish Government's policies and targets for natural capital, economic development, enterprise, innovation and Community Wealth Building.
22. Specifically, the NCIZ aims to facilitate the delivery of challenging local, regional, and national targets, including the 2030 target to halt biodiversity loss and the 30x30 target to protect at least 30% of land and sea for nature by 2030. Scotland's Biodiversity Strategy stresses the importance of connectivity in addressing biodiversity loss and climate change impacts, and that simply protecting land will not deliver its aspirations.
23. Building on the Biosphere concept of zoned areas and then sharing that approach and learning across the whole of the NCIZ will deliver innovative solutions to challenges we face today whilst providing a framework for future action.
24. The NCIZ is a critical component of the broader Borderlands Inclusive Growth Deal, the only Growth Deal in the UK to include a Natural Capital Programme. This programme consists of five interconnected pilots focusing on innovative land and coastal management, data analysis, and innovative investment modelling.
25. By integrating efforts with the RLUF, the NCIZ aims to optimise land use decisions to benefit communities, the local economy, the environment, landowners and managers.

Economic contribution

26. The NCIZ is a catalyst for economic growth in the South of Scotland. By fostering new markets and opportunities, the NCIZ drives innovation and entrepreneurship, creating a vibrant ecosystem for businesses and communities. The Zone supports the development of new finance models, attracting responsible investment and facilitating sustainable economic development. Scientific and academic opportunities are abundant, with the NCIZ serving as a hub for research and collaboration. This environment encourages job creation and enhances the region's economic resilience.
27. The visitor economy is a key part of the region's economy and "Scotland Starts Here – A Responsible Tourism Strategy for the South of Scotland"²² sets out ambitious targets to increase our visitor economy by £1 billion to £1.76 billion by 2034 and support a further 6,000 jobs to 20,000 by 2034. The strategy is clear though that there is a need to do this

²² [Tourism Strategy | South of Scotland Regional Economic Partnership](#)

responsibly for a long-term collective benefit. It recognises the need to protect and enhance the region's natural capital and an effective approach to visitor management to preserve the unspoilt nature of the region.

28. Integral to the strategy's success is inspiring visitors to come to the region as it has year round capabilities to celebrate outdoor and wildlife tourism, alongside all its other amazing assets. We want to build on the identity of the NCIZ, Biosphere and other inspiring partnerships. From Burns to the Biosphere, Sea to Dark Skys – the region offers it all.

Environmental contribution

29. The NCIZ significantly enhances the region's natural capital by promoting biodiversity, climate resilience, and sustainable land and marine management practices. The Zone acts as a living lab, providing a platform for scientific and academic research that informs and improves environmental practices. Initiatives within the NCIZ focus on restoring and protecting ecosystems, such as species-rich grasslands, woodlands, and coastal habitats. These efforts contribute to climate resilience by sequestering carbon, enhancing biodiversity, and supporting sustainable agriculture and forestry.

Social contribution

30. The NCIZ brings substantial social benefits to the South of Scotland. It fosters community wealth building by integrating and maximizing community engagement and participation in all its initiatives. The Zone addresses social inequalities by promoting inclusive and equitable development, ensuring that all stakeholders, including marginalized communities, benefit from its activities. By enhancing community networks and encouraging collaboration, the NCIZ strengthens social cohesion and supports the cultural change required for new ways of working and living.

The NCIZ Incubator – a geographic focus through the Galloway and Southern Ayrshire UNESCO Biosphere

31. The NCIZ provides a framework for a series of local projects that will deliver nature based solutions across the whole of the South of Scotland, aligning with the Regional Economic Partnership, the RLUF and the Borderlands Natural Capital Programme in Scotland.
32. The development of the Regional Land Use Partnership and RLUF has taken place at a strategic level and has highlighted the need to focus down on delivering nature based solutions at a landscape scale.
33. Acting as a test bed for innovative ways of working and creating new financial models for inward investment, GSAB would act as the NCIZ Incubator where much of the practical testing will be developed. This is a role it is already fulfilling, unofficially, under its current remit. From here, the incubator will ensure effective knowledge transfer across the South of Scotland and beyond, creating scalable, shareable, and sustainable solutions.
34. The NCIZ is a way of connecting existing and emerging strategic activity and partnerships, focus on connecting local people to local scale delivery, then take the learnings to an international audience.
35. The NCIZ Incubator will focus on several key activities to drive its mission forward, including collaboration, co-creation, data collection and analysis, innovation and the development of

new markets. With the NCIZ Incubator at the heart of the Zone implementing innovative management practices for land and marine resources and sharing that knowledge and learning across the wider NCIZ.

Stakeholders

36. The success of the NCIZ relies on the active participation and collaboration of various stakeholders. Within the Incubator area, Scottish Government, Dumfries and Galloway Council, South of Scotland Enterprise (SOSE) and the Galloway and Southern Ayrshire UNESCO Biosphere will shape the creation and delivery of the Incubator, guided by businesses, communities and partner organisations. Each stakeholder will contribute their expertise, resources, and networks to ensure the NCIZ Incubator and the NCIZ as a whole benefits the South of Scotland. Feeding this whole approach into the Regional Economic Partnership will ensure the benefits and learning are shared to deliver the vision of a *green, fair and flourishing region*, and ensuring public services are inclusive, sustainable and effective in improving outcomes.

Governance

37. The governance of the NCIZ Incubator will be guided by a small team of “Enablers”, organisations bringing leadership, oversight, and decision-making processes. This team will be led by Scottish Government, Dumfries and Galloway Council, SOSE and GSAB. This collaborative approach will ensure that the initiative is guided by a diverse range of perspectives and expertise. The Incubator, and therefore the NCIZ, will support and enhance existing structures rather than creating another level of governance. The framework will evolve based on input and challenges, becoming a living ecosystem and collaborative structure. This approach will ensure that the framework remains adaptable and responsive to changing needs and opportunities. By fostering a culture of co-creation and flexibility, it will encourage innovation and creativity within the entrepreneurial space.

Evaluation

38. Accountability, transparency and continuous improvement are fundamental principles. The progress of the Incubator will be evaluated through a range of existing mechanisms such as the REP, the RLUP and Borderlands Natural Capital Programme Board. Combined with the development of new and emerging metrics and tools, both the Incubator and the wider NCIZ will be assessed against outcomes agreed with the Scottish Government. The Programme Board and the Regional Economic Partnership will ensure that stakeholders are kept informed about progress, challenges, and successes and that best practise and lessons learned are disseminated effectively.

DEVELOPING THE MODEL

39. The NCIZ stands as a forward-thinking model for a resilient future, encouraging greater collaboration among communities, enterprises, and the environment. Through the development of a NCIZ Incubator in the west of the region this approach offers an approach to test solutions and approaches, quickly.
40. There are some pre-requisites if this approach is to be successful – and that includes ensuring that there is robust support for the partnerships and approaches that the region is currently championing, as bringing those together is central to the model we are proposing. That includes looking at how organisations, such as GSAB are funded more sustainably.

41. While we think that there is an alternative approach, there is work to be done in partnership in the region to develop it further. It is essential that work is done by people who understand the region, its opportunities and its challenges.
42. We suggest that to take the next stage of work forward, the Scottish Government establish a small, focused and funded partnership group to shape the future approach. Supported by appropriate resource, that group could deliver the proposed benefits that the Scottish Government want to see as efficiently and swiftly as possible, connecting: the economy to natural capital, people to the landscape and existing protected areas and designations.
43. There is successful precedent for this approach in the region when the Scottish Government committed to establishing SOSE. Recognising the South of Scotland required a new and innovative approach to economic development and following an analysis of potential structures, the Scottish Government established the South of Scotland Economic Partnership (SOSEP³) to help design the new agency. SOSEP advised on piloting new approaches to economic development across the South of Scotland, advised on the structure of the new body and undertook significant public engagement to ensure plans for SOSE were deeply rooted in the South and what people across the region wanted to see.
44. We recommend a similar approach be taken to shaping the way forward – with a group drawing together key partners (including SOSE, the relevant councils, GSAB, and other key public sector bodies such as VisitScotland and other key sectoral interests e.g. the National Farmers Union Scotland). There would be value in including UNESCO in that group to maximise the benefit from the Biosphere designation.

CONCLUSION

45. SOSE believes that there is benefit in exploring an alternative approach, drawing on the unique assets and structures of the South of Scotland and is committed to working with the Scottish Government and other partners to engage in this next stage.

SOUTH OF SCOTLAND ENTERPRISE
14 FEBRUARY 2025

³ [South of Scotland Economic Partnership \(SOSEP\)](#)

ABOUT US – FOR DATA HANDLING PURPOSES

We are submitting this response as an **organisation** that operates in the region. We work across the South of Scotland with many of our employees living there.

Our registered **address** is: Carmont House, The Crichton, Bankend Road, Dumfries, DG1 4TA.

I am submitting our response on behalf of **South of Scotland Enterprise**.

We are content that you publish our response with my name and organisational details.

[REDACTED]

SOSE

14 February 2025