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Response to consultation on 'Scotland's first Coastal and Marine National Park

The ASSG is pleased to respond to the consultation document on the proposal concerning the CMNP, as some of our members would clearly be potentially impacted by such a designation.

Chapter 1 : While not opposed, in principle, to the concept of a CMNP, we are concerned that the attraction of such a designation could severely overload the infrastructure of the region selected, specifically the road network (already a constraint in supplying a fresh, indeed a living, product) and the sewerage treatment capacity (under-performing Scottish Water assets are already suspected as the source of rising levels of microbiological pollution in certain areas). As a result, we fail to identify a net economic benefit or added value for our sector from such a development, without the investment of significant public sector resources, both capital and operating.

Chapter 2 : The accessibility of the suggested 'front runners' is, in truth, one of our concerns; their proximity to the Central Belt population centres would stimulate significant numbers of visitors, especially daily visitors who would be contributing little to the local economy but stressing the already strained infrastructure. These areas are already overloaded with visitors, and have no need for additional numbers.

Chapter 3 : Planning power over aquaculture is only currently being allocated to Local authorities, and it would be bizarre to create a derogation of such powers within a single national park area in the following year. Any CMNP Management should have no more status in consideration of planning applications than any other statutory consultee; therefore with respect to 'Relationships with aquaculture', we would support Option (e).

It should also be taken into consideration that there may be a conflict between the proposed CMNP powers and the measures required/recommended under such initiatives as AGMACs, ICZM Directive, EU Marine Strategy, etc. We continue to believe that the CMNP process is being driven at too swift a pace, and that there should be a significant 'pause for reflection' after this consultation.
