

Proposals for a Marine and Coastal National Park.- comments submitted by the members of Ballater and Crathie Community Council following the meeting on 11.12.6

This document could be described as of careful design with interesting photographs and a wide sweep of material concerning Scotland's geography, history and tourism. Or it could be described as illegible to people with less than 20:20 vision and a bright light, romantic, vague and concerned with the work of agencies other than SNH while giving no impression of scientific rigour.

The reasons for setting up a Marine and Coastal National Park, under the 2000 Act are given as 1) The Executive has decided.

2) there would be 'greater coherence to marine-related infra-structure' – but no evidence is yet forthcoming that coherence is actually effective in conservation, recreation, sustainability or socio-economic development.

The number 3) reason is 'vision', though no practical method or result is quoted; 4) is 'to plug gaps', and 5) 'more effective government'. Again no example is described.

Examples of successful conservation in other National Parks are described – though recent DEFRA reports indicate that while total exclusion has been successful in restoring abused areas, this is no longer to be used as a policy in English marine areas, and, of course, there is no requirement for social-economic development in English National Parks. Some Continental National Parks are controlled by completely elected local Boards, and the small Parks in heavily occupied areas are often so small as to be hardly capable of the 'wildness' so desired in our two.. All the given descriptions of foreign Parks ignore the extreme position of the density of population within the British Isles and the early economic exploitation coupled with an appreciation of natural life and nurturing variety by individual choices, whether in town gardens, trout streams in farms, or large estates.

In practice, the sea is so effective a distributive agent that biodiversity in any place depends on climatic and ecological conditions apart from pollution and overexploitation – by native predators as well as later human ones. All of Scotland has been affected by human occupation - which is the business of RCA&HMS, and Historic Scotland, depending on age. The Geological Survey deals with rock and SNH has yet to monitor details of biology, or land use, so there is no true scientific discussion of any grounds for choice of any area for these proposals.

All Scotland is 'special'. Varied natural characteristics within a small area of the globe, with equitable laws, early educational attainment and skills of a lively-minded population led to 'classical sites' in the history of all the natural sciences. Already there have been local successes in protection. Lamlash Bay is reported to be swarming with codlings since disturbance was prohibited and the area off Applecross which is closely patrolled by the Royal Navy, is also quietly reported to be a nursery for a number of species;

There is no discussion on this point and it may well be forbidden by the CFP, but it would not require the formal setting-up of a National Park to organise agreed moving,, perhaps 10-year, 'boxes', along the whole coast, with locally elected fisherman to act as Guard-boats supplementing fast Marine Protection vessels and improved Coastguard Watchers with reliable electronics, to note and remove any disturbers of the nurseries. This could be done on a national basis and serve as a research tool of value globally. **But would**

**depend entirely on the difficult-to-achieve complete agreement of the electorate. There does not seem to have been any public discussion of this possibility.**

.There are no page numbers or indexes, so it is not easy to refer to places within the document for discussion.

If there is to be an advancement of learning, we need researchers, rather than administrators and Boards. Nor does there seem to be in this paper an appreciation that demographic changes do require a basic understanding that all country areas' need is for local housing for local employment to maintain any local socio-economic stability and mutual understanding. There is no commitment to equality with towns in matters like availability of wireless Broadband or digital television and radio, let alone hospitals and centres of higher education for individuals in local occupations. Sustainable sea transport is also ignored.

It was notable in the consultations on the 2000 Act and the two new National Parks, that a very large proportion of indigenous responses advocated an entirely elected Board. Even if 15 Members were elected directly, with the new multi-member wards it would be difficult to find 5 County Councillors with direct knowledge of any of the proposed areas or the time and local people also with time for 5 knowledgeable appointments from the Executive. If Planning is to be a function of the Board, local connection is vital for the acceptable governance of any area.

Training programmes also require convenient premises if unsustainable travel is not to take up more time than can be acceptable to small business. Are apprenticeships available?

There is nothing in this paper on the removal of availability of 'red diesel' for use in pleasure boating. This change will increase expense, possible pollution and danger especially if there are no access points in harbours for the expensively taxed 'white' variety. If there is to be important diving activity in an area, it cannot be that SNH advocates people carrying fuel as deck-cargo or rolling drums down main streets for refueling. Is there to be a concession which allows seasonal use of fishing vessels as diving support with continued access to 'red'? A line drawn in such circumstances would consume a great deal of effort and official discussion, but in any case pleasure-boating cannot be relied on to continue at present levels, in comparison to French prices.

It is not clear on whose public support is required for movement towards a National Park. Do 50 local Crofter/Fishermen signing a petition against count as numbering one, or 5 individual divers' letters from Gourock, for instance, count as numbering 5, for?

**Boundaries:** To include 4 miles inland as suggested does not make for coherent or efficient administration and has no relationship to landscape as such. Possibilities like

- 1) The first seaward parish;
- 2) A particular height like the 200 feet or 200 metre contour;
- 3) The height of land

at least all have some relationship to communities, occupations or interests, but the SNH suggestion ignores tradition, convenience, landscape and reality in a manner that shows a complete lack of human understanding. Again the concept of 'Place' is one of major importance in social cohesion and management of the business of nature.

Your policy of excluding 'large settlements' removes urban concerns, but also most commercial and 'retired' knowledge. It also makes life difficult for any

incoming staff in finding premises, housing, schools or medical services when there is so much centralisation in progress. Of course, the selection of staff might turn out to unlike that of the earlier National Parks where only 10% of the new administrative, research and managerial employment went to people already living in the area, of whom perhaps half were true *indigenes*. Perhaps there is to be a policy of using local knowledge and experience?

**Social Geography and the Indicative Map:** do not agree. In it Ardnamurchan has split off the western part, putting Kilchoan to Mull - on the strength of a small ferry?. It have always been understood that the Small Isles are Eigg, Rum, and Muick, served from Mallaig, while Tiree and Coll and Morvern in Argyll are on the Oban-Mull run and Islay, Jura and Colonsay look to west Loch Tarbert with Gigha and the west coast of Kintyre ( which you exclude) making up one system. You split Mull and Iona, which have been working hard in what was supposed to be a successful coherence, and, again, to split Skye implies a possible odd intention to divide and rule. Moreover, to say in one part, that the Minch should be a national responsibility and put the Shiantis into the Long Island, is probably right , managerially and biologically ( though you do not mention the Hebridean wren or the bee ) but is neither coherent geologically, nor efficient, any more than the disregard of the coast north and east of Coigach.

It is interesting that among the references to Bronze Age and Neolithic archaeology covered by peat, that disturbance by windmill foundations is not discussed. But of course changes in climatic conditions before our Industrial Age are no longer recognized by UK government science. There is no reference to distilling in Orkney which has been producing bere or barley so efficiently. There is no discussion on any possible coincidence between the occurrence of a 'rare sea anemone in Loch Fyne' and close naval control. Low employment levels in the Clyde and Solway areas can be partly related to nationalization/re-nationalization and European directives in ship-building as well as exhaustion of local natural resources, difficulties in health provision and now complications in the dairy industry, including the CAP requirement that 15% of milk products comes from out-with the UK. It has been noticeable in Galloway that the tourist industry is largely the result of local effort and capital rather than from out-side..

Returning to wreck-diving – this is of course, a high-value recreation past-time, but hardly involving more people than the rarely mentioned trout, salmon and sea trout fishery which takes place at sea as well as on rivers, lochs and estuaries..

Only the Orkney musical tradition is mentioned, but not the important Shetland one, and there is a happy reluctance to regard any effects that may occur in the upper Solway estuary, either in flows or biologically, from plunking wind-farms down the middle sands. Nowhere is there discussion on a balance of geese-grazing and food-culls by humans or the effects of the increase of bonxies and other increasing predation on smaller species. When policies have still to be established on hill-grazing, this does seem to cry for more research before trying to establish balances in nature. The Southern Uplands Way is a considerable distance inland. On the Long Island there still does not seem to have been any apology yet on mistakes previously made by SNH in biodiversity surveys and the economic loss caused. The success of IT development in Harris is not mentioned, or any possibility of coherence in marketing.

In the CNP we have produced many Committees, Forums, Associations, Advisory Groups and Plans – all meetings with costs which have no direct effect of the four Aims

or lives of the inhabitants, sentient or vegetable. There have been some training schemes, delineation of walking paths, delays in opening paths of communication and some pretty printings of this or that. The Moorland Project, put in place by the earlier Partnership, was cancelled because of administrative and interpretive costs, though fencing was shown to be effective for shrub-growth. We enjoy the social contacts and shared frustrations of living across natural and administrative divisions and await with interest the publication of the Statutory Plans, when we shall find out if the promises of 'listening to local opinion' have been fulfilled. All the able, honest, competent, hardworking, white-collared and pleasant staff have been welcomed and tried to fit into the local communities. These are good local jobs, but there are not, as above, many local people in them. There is little agreement yet as to whether any increase in visitors will affect the environment for good or ill. Extensive deer culls are causing anxiety, as, we imagine, the latest research of cetaceans' reactions to over-enthusiasm in close approaches by boats, will be of interest to both scientists and boat-hirers.

SNH initially provided information which was in parts 15 years out of date for the Cairngorms National Park Plan. Other consultants put in unco-ordinated social information. A book on Nature and Biodiversity of the Cairngorms has been published which brings some up-dating, but not always in-depth specialist knowledge. Now, there is little confidence that outside research is efficient or properly applied, except by those specialist departments who have been found to be staffed by people with their feet on the ground, able to make clear explanations and show no inclination towards display rather than facts. The habit of 'deciding first and finding out a long time later' ..... after many millions have been spent from various sources, mostly from tax-payers after administrative additions, is not necessarily 'best value'. Designations of themselves as conservers nothing.

There is a need for basic initial protection from increasing numbers of humans, but there is no certainty that this can or should be imposed by administration driven by sentimental politics rather than local knowledge and economic benefit. All over the world users of natural resources, when allowed the benefits of the harvest, maintain a structure which conserves it for others as well as themselves. There is no evidence that suitable tax-structures and local wisdom, advised by in-depth research, would not provide conservation, recreation, sustainability and social and economic benefits for such areas.

Therefore the answers to the questions put are:-

1. Added Value –None
2. Selection of area- this paper gives no particular scientific clues – as above, all of Scotland is 'special and classical'. The areas favoured by the paper seem to be popular holiday destinations and accessible via the Crinan Canal from Glasgow to where whoever among the authors enjoys wreck-diving. Boundaries as above - certainly not an arbitrary line.

3. As we would not advocate a Park, we would simply point out that an elaborate structure cutting across landward concerns will be confusing, distracting, expensive and undemocratic. We do not wish any more bureaucracy in a formerly democratic and enterprising country.. As above, temporary moving boxes for total relief of exploitation and better use of waste ( forbidden by the EU now) would permit restoration of losses – paid for by locally administered compensation. Inshore Fisheries Management by locals is the base for any conservation – they should be allowed to get on with it and reap the benefits rather than people in warm, safe offices..
4. Aquaculture – needs more international health controls and national marketing. The quality of Scottish salmon is not sufficiently emphasized against others marketed on the Continent already - without the recent production of other species.
5. We are against the lack of directly elected members of those Boards in existence and any further extension of Parks until it can be seen that local opinion values them or is valued.
6. As above Users not resident are welcomed visitors who will be listened to politely, and explanations given if it seems they will be understood. But sometimes people will be driven to say things like – “I’ve always wanted to fish in the Nor’ Loch and sling a ski lift across to the Castle for paragliding to the Meadows. To straighten out the Lothian administration by a powerful Provost,, we would of course appoint him/her from Glasgow”. Localism, though slow and extremely difficult, is better for everyone than top-down, dictatorship, however well-meaning
7. Any bureaucracy is expensive. Give local associations a stationary-, equipment- and secretarial-help grant, and then get out from under for economy.
8. The total national cost is a lot greater than the formal grants to the early National Parks and does not include the time and effort of volunteers and small businesses...

To quote from Martin Martin at the beginning of the 17<sup>th</sup> Century, ‘there is nothing wrong with the Highlands but that a little capital would provide’.