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Scottish Executive Environmental and Rural Affairs Department,
Marine Management Division
G-H93
Victoria Quay
Edinburgh
EH6 6QQ

Dear Sir/Madam,

Consultation on Scotland's First Coastal and Marine National Park

I am writing on behalf the Botanical Society of the British Isles. Our society membership uses its expert taxonomic and identification skills to collect and curate vascular plant data. This data used by the Scottish Executive, Joint Nature Conservation Committee and the Country Agencies, such as Scottish Natural Heritage, and others to inform policy, to help set conservation priorities and directly to help conserve vascular plant populations. With our limited resources and small membership we necessarily restrict our activities to those outlined above, and leave conservation work to others.

However, we would generally **support** the proposal to designate National Parks which include areas of semi-natural coastal habitats. We are not concerned about the designation of the marine element, except in as far as that might affect the coastal habitats of vascular plants.

The responses below relate to the views sought under the relevant Chapter in *Scotland's First Coastal and Marine National Park: A Consultation, Scottish Executive, 2006*.

Chapter 1: What problems could a Coastal or Marine National Park address?

Generally, a National Park designation should ensure that the Natural Heritage of semi-natural coastal habitats, and - specifically - populations of notable vascular plant species are properly conserved and protected in areas outside those already statutorily designated (such as some Sites of Special Scientific Interest).

A serious issue affecting vascular plant conservation in semi-natural coastal habitats along some Scottish coastlines is that of diffuse pollution from adjacent farmland. Typically fields which are intensively farmed lie above a narrow strip of coastal cliffs and grasslands. We have observed reductions and losses of some notable coastal species in these areas. We hope that the proposed National Park would have powers which go beyond their boundaries in terms of controlling activity which damages their natural heritage.

Chapter 2: What should be the basis for selecting the location?

Whilst we support all three key principles, we would rank the Park area being of outstanding national importance for natural heritage as the most important selection criteria. In terms of vascular plants generally the most importance coastal habitats for vascular plant populations lie on the richer soils to the south and east of the country. Particularly rich areas for notable plants include the Moray Firth, Angus and the Solway Firth coasts, although many of the notable species in the Solway area are more common south of the border.

If accessibility improvements are proposed along the narrow coastal strips, such as coastal footpaths, great care should be taken not to damage and reduce the extent of this already rather limited semi-natural habitat – and its notable vascular plant populations. A proper and systematic survey and assessment is recommended, view a view to avoiding, or at least minimising adverse impacts.

We believe the landward boundary should include all semi-natural coastal habitats in reasonable condition and exclude all intensive farmland. So it should include foreshores, sand dunes, dune slacks, salt-marsh, semi-natural coastal grasslands, and woodlands, sea cliffs, machair, raised beaches, brackish ponds, river mouths, etc. The boundary should be an obvious and substantial feature, such as a field boundary fence or dyke, where that exists. It may be some distance inland or quite close to the sea, and may not exactly correlate with the boundary between farmland and semi-natural habitats.

Chapter 3: Functions and Powers of the Park Authority

We believe that the National Park Authority should have full powers as planner, enabler, manager and regulator to provide a fully co-ordinated and effective delivery of key national park objectives (primarily the conservation of the natural heritage).

The National Park Authority should be fully and adequately resourced to enable them to perform effectively.

We hope that this is helpful. Please do not hesitate to get in touch should you have any queries.

Yours faithfully,



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