



CROFTERS COMMISSION

UGHDARRAS NAN CROITEARAN

Direct: 01463 663422

E-mail: nick.reiter@crofterscommission.org.uk

Ms Nikki Milne
SEERAD
Marine Management Division
G – H93
Victoria Quay
Edinburgh
EH6 6QQ

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Dear Ms Milne

CONSULTATION ON SCOTLAND'S COASTAL & MARINE NATIONAL PARK (CMNP)

The Commission welcomes the opportunity to comment on this consultation.

The Crofters Commission is a Non-Departmental Public Body (NDPB) of the Scottish Executive Environment and Rural Affairs Department that regulates and develops crofting, advises Ministers on crofting issues, promotes the interests of crofters and keeps under review matters relating to crofting. Its authority and powers are set out in the Crofters (Scotland) Act 1993.

CONSULTATION

The timescale of the Executive's consultation has meant that the Commission has not been able to consult with its stakeholders, most importantly crofters and crofting communities. The Commission feel that the consultation has lacked depth and breadth. More work is required to engage public debate, in particular in the candidate areas. The Commission would have to be assured that vital crofting interests would not be adversely affected. Feedback we have received from those who have attended the various information events has not assured us on this front. This, coupled with the fact that there is no decision on the area to be designated and no determination of what if any landward boundary would be, leads us to conclude that the detailed questions posed by the formal consultation document are premature. The following therefore are the Commission's more general and strategic comments.

COMMENT

The Commission is encouraged by the Minister's comments regarding the principles of sustainable development and the promotion of social and economic development that designation of a CMNP would bring. The Commission is open-minded on the issue of the establishment of a CMNP. The key point that we would wish to get across is that the advantages and disadvantages of such a Park need to be fully debated by those communities who may be affected and that these debates are carried with full and comprehensive information being available. Should a marine park be created it should be with the active assent of a reasonable proportion of the affected population. We are aware of the various information events that have taken place across the country but the feedback we have received from those who have attended is that they were slanted in the direction of supporting CMNPs.

We would wish the information to be more balanced so that individuals and groups are able to consider the issues that are relevant to them so that they are then able to arrive at their own conclusions.

INDICATIVE AREAS FOR A CMNP

The indicative Park areas identified in the consultation, with the exception of the Solway, would all impact on crofting to some extent or another. The majority of crofting communities are situated along the coast with a high number of crofters deriving a proportion of their income from fishing, fish farming, marine tourism and other maritime related activities. Due to the lack of definition of the landward boundary of the Park and the wide range of powers it could exercise, the Commission are at present unable to give a definite response on the desirability or otherwise of a National Park designation in any of the areas suggested.

Were the boundaries of the CMNP to be set inland the effect on crofting would be very significant. In general the Commission would be very concerned if there were additional bureaucratic processes in place or any additional regulation that would overburden individuals and groups and inhibit development or initiatives. However, establishment of a park could provide an opportunity to remove unnecessary bureaucracy and allow for creative locally based management of environmental schemes. Here could be an opportunity to pilot cleverer and more targeted schemes based on local analysis of need.

A PARK AUTHORITY

The Commission would expect the Park to have its headquarters within the area designated, creating local employment opportunities and leading to enhanced service provision.

The Commission would support a model of the Park Authority being made up of 80% local Board Members, who live and work within the Park, operating with substantial autonomy within a set framework. That framework should be a strong statement of intent on environmental management that allows local development and initiative to flourish.

TIMESCALES

The Commission is concerned that the timescales indicated for the establishment of a Park are unrealistic. The Commission is of the view that the process would benefit from a longer lead in time to enable the many questions and issues arising to be resolved. This would enable stakeholders to consider and evaluate the implications of the park for their business enterprises and the impact it could have on their daily lives. The establishment of a shadow body as a forerunner to a Park Authority that took matters forward on a step-by-step approach may be a way to address and alleviate local concerns.

CMNP POWERS & RESOURCES

The Commission would wish to be assured that additional funding would be provided by the Executive to enable the Park to adequately discharge its functions and that this should not be at the expense of cuts in funding in other local or national organisations.

The designation of a Park should lead to the promotion of that area's social and economic development as outlined in the Minister's statement and not as an inhibitor of future development of new and existing business.

The Commission would wish to see assurances given to local crofters, crofting groups, fisherman and other businesses that their ability to continue and to enhance their businesses would not be effected by the designation and local fishery development under the fishery development groups should continue.

The Commission also see any Park Authority as being a planner and enabler in the initial stages of the Park's creation with the provision for review of its strategic aims and objectives and the implementation of these in light of experience at some later date.

CONCLUSION

The Commission would encourage debate of all relevant issues by those who may be affected by the creation of any CMNP. This would ensure that parties are clear on the implications of a CMNP and that all views are fed into the consultation process.

The Commission would welcome the opportunity to make further comment once further information is available on the terrestrial boundaries and to be able to consult with our stakeholders before any decision on areas are taken.

Yours sincerely

A handwritten signature in black ink, appearing to read 'N Reiter', written in a cursive style.

Nick Reiter
Chief Executive