



Ms Nikki Milne  
Scottish Executive Environment and Rural  
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Your Ref:  
Our Ref: PRO/FOR/CLY/CON/CMNP  
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Dear Ms Milne

**SCOTLAND'S FIRST COASTAL AND MARINE NATIONAL PARK:  
A CONSULTATION**

Thank you for consulting the Firth of Clyde Forum on the above. We welcome the opportunity to comment on the proposals for Scotland's first Coastal and Marine National Park (CMNP).

**Background**

The Firth of Clyde Forum (FoCF) is a voluntary partnership of local authorities, organisations, businesses, communities and individuals committed to working towards integrated, sustainable management of the Clyde's environmental, economic and community resources. As a voluntary partnership we work within our agreed guiding principles, contained in a document entitled "Integrated Management Strategy and Action Plan for the Firth of Clyde" published in 2000 and founded on the principles of Integrated Coastal Zone Management (ICZM). Further information on the FoCF can be found on the Forum's website at [www.clydeforum.org](http://www.clydeforum.org).

The other major Scottish firths have similar coastal fora and it is widely recognised that these provide effective mechanisms for delivering ICZM locally, guided by agreed national policy. One of the main strengths of these partnerships is their long established, well recognised networks of a wide range of local coastal and marine stakeholder contacts. They are well placed and experienced in conducting community consultations, promoting a participative approach to coastal zone management, conflict resolution and project support and implementation in a cost effective manner.

**The added value and benefits of a CMNP**

The overall objectives of the FoCF are to harness the economic and environmental advantages of the Firth of Clyde, to focus on regeneration, to coordinate and manage the Clyde by sustainable principles and thereby to balance the commercial, economic, environmental and social interests of the users and inhabitants of the Firth of Clyde. The FoCF therefore welcomes the commitment to the principles of sustainable development in the establishment of any CMNP. The FoCF also welcomes the acknowledgement of the important status of Scotland's natural and cultural heritage as well as a commitment that a CMNP must deliver economic and social benefits in its area.

The FoCF agrees that the aims of a CMNP should be to protect natural and cultural heritage while at the same time providing economic and social benefits.

There are a number of initiatives currently ongoing in the marine environment; many of which have a much wider remit than that of the proposed CMNP, and include the Scottish Executive's Scottish Sustainable Marine Environment Initiative (SSMEI) Pilot studies and possible initiatives discussed by the Minister's Advisory Group for the Marine and Coastal Strategy (AGMACS). The FoCF is

concerned that costs and man-power needed to plan and establish a single CMNP may divert efforts and resources from these other important initiatives. The FoCF is particularly concerned that resources could be diverted from the design and delivery of a complete system of Marine Spatial Plans for Scotland, a suite of marine protected areas and a continuing network of Local Coastal Partnerships needed for the delivery of ICZM. **The FoCF would not support the establishment of a CMNP if it detracted in any way (for example in resource or attention terms) from the development of these more broadly based and Scotland wide marine initiatives.**

### **Selecting the Location of Scotland's First CMNP**

Based on the criteria for selecting the location of the CMNP, the FoCF believes that the Firth of Clyde would be a suitable candidate for a CMNP, in particular in relation to the Ministers' two additional selection requirements for location consideration in that the designation of the area would make a significant contribution to the social and economic development of its communities and, the area is generally accessible to a large percentage of the population of Scotland.

Nevertheless from the studies it is clear that there are many other locations around Scotland with equally valid claims for a CMNP. What is important is that any area proposed does not negate the capability of other areas either developing CMNPs in the future or exploring other opportunities to progress MSP and ICZM by different means. What might have been helpful in this regard is a more detailed study of the social and economic benefits to coastal communities rather than just an assessment of environmental worth.

### **Functions, Powers and Governance**

The formerly designated Parks in and around the Clyde, including Loch Lomond and Trossachs National Park, Clyde Muirshiel Regional Park and Argyll Forest Park, create potential synergy with a Clyde CMNP and would make an integrated approach possible for land, coastal and marine environmental management.


The FoCF acknowledges that the CMNP process is still in the early stages and that further consultation will be carried out looking at the functions a National Park Authority would be expected to exercise. The FoCF feels that once these details are known it will be able to comment in more detail on the proposals and would be grateful for the opportunity to do so.

### **Conclusion**

The FoCF feels that if the Firth of Clyde were to be chosen as the location for Scotland's first Coastal and Marine National Park it is well placed to contribute to the development and local implementation of the CMNP: It has a wide range of stakeholder involvement, a network of Clyde area contacts and experience in consultation and project management. However, as mentioned previously, a CMNP must not divert resources and political will away from other marine initiatives currently underway or being developed. It must be seen in the context of a Scotland-wide solution to coastal and marine management and in the case of the Clyde, must interface with the aims of the existing statutory authorities.

I hope these comments are useful. Please do not hesitate to contact me to discuss this response further. We would welcome further discussion with the Scottish Executive Environment and Rural Affairs Department on these issues as the Coastal and Marine National Park is further developed.

Yours sincerely



Isabel Glasgow  
Firth of Clyde Forum Chair