

Coastal and Marine National Parks
Scottish Executive Consultation Response



Submitted by

Hebridean Partnership

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Summary

Hebridean Partnership proposes that Scotland's first Coastal and Marine National Park should be the combination of the two areas put forward by SNH and agreed upon by the Ministers: namely, - Argyll and the Isles and Ardnamurchan, the Small Isles and South Skye Coast. All of the sea lochs, including those on the mainland should be included as these form the fjordic, convoluted coastline characteristic to the region. Oban, known as the "Gateway to the Isles" should form the main hub and access point.

Scotland's first Coastal and Marine National Park should be selected on merit on the basis of natural and cultural assets and accessibility to the area. Members of the Hebridean Partnership have identified an area, which excels in all of the identification criteria laid down by SNH: Argyll and the Isles, extending to the Small Isles, Ardnamurchan and Morar and Moidart. This area includes many special natural features, outstanding examples of habitat, fauna and flora, some unique and best examples in the UK, Europe and the World. The region is a cultural and historical "Mecca". With Oban forming a natural gateway, accessibility from major population centres including Glasgow, Edinburgh and Inverness is achieved.

Tourism is the premier industry of the region and development of true eco-tourism would be beneficial to the communities and the environment. The cultural fabric is fragile and would benefit greatly from a sustainable future economy that a CMNP could bring to the area. The local communities are proud and independent; they need and must be kept informed and involved in any developments. An equal representation of the three sectors within any future National Park Authority must be established. The CMNP area must be large enough to account for the dynamic tidal influences. It must be large enough not to conflict with fishing and aquaculture industries, e.g. extend out to the 12-mile limit.

The National Park Authority must have full powers or the potential benefits may not be achievable. Inclusion of "no take zones", as recommended by the Royal Commission, within the CMNP would allow for regeneration of natural resources, enable commercial sectors to gain from these restrictions, allow scientific and educational programs to benefit and flourish from relatively untouched areas. Effective spatial planning may provide for specific fishing activities and locating of aquaculture sites thereby reducing some of the present pressures and conflicts. The land area of the islands within the Park should be included and the land on the mainland should be considered by merit and its ability to form a coherent structure and link areas of interest within the park area as a whole.

With the increase in public awareness of the potential sites for CMNP's a small, well-funded and well-connected "anti-lobby" has formed. This anti-lobby appears to be backed by those with a vested, singular interest. The propaganda and intimidation tactics used is effective in kerbing free speech and correspondence within small rural and island communities.

Despite the resources being deployed into the current consultation process people are still very wary of government initiatives, local people are still very unaware of the full implications a CMNP could bring. With this in mind many people have voiced concern that they feel that they simply don't have enough information to comment.

We need an education programme through television and national newspapers about the success stories of Marine National Parks and Marine Protected Areas elsewhere in the world. Presently people are afraid of change and unaware of the full benefits. This full information needs to be disseminated before any decision on location is taken, only then will the mass of moderate people become involved.

It is VITALLY IMPORTANT that this request for information is not taken as a "negative" outlook. In fact it proves that our modern educated society requires more information and wants to give an informed decision before replying.

Background

The initial area put forward by the Hebridean Partnership in the 2003 proposal to the Minister extends out from the gateway to the isles: Oban. Coll and Tiree, Hyskier and the Small Isles determined the western limits, the northernmost town being Mallaig and the southern limit Crinan and north Jura including Colonsay and Oronsay. All of the sea lochs were included within this region, including lochs Eil, Leven and Etive (**attached map annex one**).

Talks, publications and consultations conducted by the Hebridean Partnership have received comments from areas out with the initial proposed area to be included. These include: Knoydart, South Uist and an area including Bute and Arran. Some members have suggested that the proposed park should include all of Jura and Islay with a corresponding section of the Kintyre Peninsular. A strong preference was received to include all of the land areas of the islands within the Park and the land designation on the mainland could be determined by merit.

Initial communications from the Hebridean Partnership were sent out to all areas of Argyll and Bute, Lochaber and the west Highland region and the Western Isles. This was later restricted to west Argyll and the isles from Campbeltown to Appin, Lochaber, Skye and west Highland and the Uists, Benbecula and Barra.

The creation of a CMNP in this area would allow for a unified approach towards the management of the area which is needed to reflect dynamic marine influences, these would complement existing designations e.g.

- National Nature Reserves on Isle of Rum and Tainish Oakwood, Loch Sween.
- Ramsar sites on Coll and Islay.
- National Scenic Areas of Jura, Mull, Lynn of Lorn, Firth of Lorn, Glen Coe, Knoydart, Loch Shiel, Morar, Ardnamurchan (the most westerly point on mainland Britain) and the Small Isles.
- Numerous SSSI's throughout the area.

- The Special Areas of Conservation such as, the Sound of Arisaig, Loch Moidart, Loch Sunart, Treshnish Isles, Lismore Skerries, Loch Creran, Firth of Lorn and Moine Mhor.
- The Special Protection Areas, on Mull, Canna and Sanday, North and South Coll, North and South Tiree, Glas Eileanan and North Colonsay.

This incomplete list is indicative of the highly significant importance and diversity of the region.

Natural Environment Reasons

Local knowledge, scientific journals and papers supported the initial area put forward by the Hebridean Partnership, including many reports commissioned by NCC and SNH. SNH has several local offices in west Argyll, at Lochgilphead, Oban and on the island of Islay. The premier Scottish centre for marine science is also located near Oban, the Scottish Association for Marine Science at Dunstaffnage. The SAMS laboratory is the marine science campus of the University of the Highlands and Islands. The Scottish Sea Life Sanctuary is situated on the shores of Loch Creran, providing an education centre and a rescue and rehabilitation unit for marine animals.

The Scottish west coast is comprised of ancient to recent geological strata, spanning from the oldest rocks in the UK to some of the best glacial relics from the last glacial maxima. These geological features have produced the well-known and loved fjordic and less known fjordic regions surrounded by spectacular mountain ranges. Beaches range from golden sands to steep cliff vertical drop-offs, several hundreds of metres deep. These features combined with the large tidal flows present within the region produce tidal phenomena including the Corryveckan whirlpool and the Loch Etive tidal falls known as the Falls of Lora, both significant by world standards.

These morphological features have been shaped by physical, chemical, biological and geological processes producing the convoluted coastline that we see today. The west coast is influenced by two major currents; an off-shoot of the Gulf Stream, the North Atlantic Drift Current, bringing warm water to the region, which is responsible for our moderate maritime climate, and the Boreal (cold water) Currents from the Arctic region. These converging currents and westerly wind systems produce a strong up-welling, which is responsible for the nutrient replenishment, which in turn provides for the “kick-start” to the phytoplankton spring blooms, forming the base of the food web.

Up-welling regions account for some of the world’s richest biological areas. These currents provide the nutrients and food for the numerous species found throughout the west coast, and with over 8000 marine species identified within this area it is not possible to overstate the importance of maintaining the outstanding biodiversity of the region.

Reference is however made to the UK and Scottish Biodiversity Action Plans and Scottish Biodiversity List and the European Union Natura 2000 programme. Here both habitats and species have been identified as being amongst the best UK examples of their kind; in some instances the best in Europe and some globally. Numerous scientific reports exist listing priority habitats, fauna and flora.

It is worth mentioning here a few species that are important to members of the general public and on which much of the tourist industry relies.

- The area is recorded as one of the worlds “hot spots” for cetaceans, from porpoise and common dolphins to minke whales.
- It is the most important region for these species in both the UK and Europe.
- The area has significant numbers of both types of pinnipeds, Common and Grey seals.
- Basking sharks frequent these waters during summer months.
- Otters can be seen regularly throughout the area.
- Raptors include golden and sea eagles.

The area proposed by the Hebridean Partnership contains the following: -

- World’s largest and best-developed serpulid biogenic reef in Loch Creran, it is unique in Scottish waters.
- The Northern Hatchet Shell is also found within this area, also unique in Scottish waters.
- The numerous isolated islands and islets provide sites for nesting sea birds; Argyll contains the largest colony of Common Terns and 90% of the UK total in two locations, the feeding area of the Sound of Mull site extends into Highland Region.
- The region is among the richest areas in the world for maritime bryophytes and lichens, many of which are highly sensitive to pollution.
- The wide range of natural habitats that support the myriad of biological diversity of the area includes high quality examples of most of the marine habitat types that occur around the British Isles, including the tidal rapids of the Sound of Jura/Firth of Lorn and the maerl beds of the Sound of Arisaig.

It could be argued that as the region supports such a diverse range of macro-fauna the lower trophic levels must be present to support it, but this situation is changing as the lower numbers of fish being caught by anglers bears witness. The 1982 report for JNCC indicated that at that time the area had almost twice the number of species than the nearest competitor.

Cultural and Historic Reasons

Historically the whole of the Scottish West Coast is significant. **One area, however, emerges as the “common denominator” in just about all of the historic events, which have been documented, and evidence, which has been recovered. This area is North Argyll, including Mull, Jura and Scarba and Southern Lochaber extending out to the Small Isles, centralising on the Lorn region.** This area is of world renowned for its potential for sailing and its past is significantly important for the quality and quantity of wrecks. The area is one of the UK’s best dive sites including some of the most commonly dived wrecks such as the Breda, Hispania and the Rondo. The area also contains some of the historically important wrecks such as the Cromwellian ship the Swan and the HMS Dartmouth both in the Sound of Mull.

Most of Scotland was affected by the ice age, the Loch Lomond Re-advance being the latest episode which terminated between twelve and ten thousand years ago. As the ice retreated opening up new land, human activities increased from the southwest. Jura was probably one of the first areas to be inhabited.

There are a number of local museums depicting the history and culture of Argyll and outstanding among these is the popular Kilmartin House Museum in mid Argyll.

Much of the area is steeped in history a few of the highlights include:

- Remarkable archaeological remains of early life in Scotland are to be found in Kilmartin Glen, this includes prehistoric chamber tombs and standing stones.
- Mesolithic cave dwellers are thought to have inhabited caves in Oban Bay 7000 years ago.
- Brochs and Duns of the Iron Age about 100 years BC e.g. on Lismore and Mull.
- The Scots Kingdom of Dalriada in AD 498.
- Saint Moluag founds a monastery on Lismore and St Brendan on the Garvallaachs; here the double beehive hut is the finest example in Scotland. These Saints came before St Columba who landed on Iona in AD 563.
- The Viking raids which started during the eighth century.
- The Pictish and Scots Kingdoms united under MacAlpine in the ninth century.
- The Stone of Destiny was housed in Dunstaffnage Castle for 400 years before it was removed to Westminster Abbey.
- Somerled in the twelfth century challenged the Norwegian rule.
- The MacDougalls built Ardchattan Priory, Loch Etive, the site of the last parliament of Scotland to be held in Gaelic.
- Dunollie castle was built in 1247.
- King Alexander II died on Kerrera.
- Lordship of the Isles passed from the MacDougalls to the Stewarts and on to the Campbells.
- The lands of Breadalbane or Kingdom of “Albane” were founded and many castles were built, including Barcaldine and Kilchurn.
- Cromwell’s troops were garrisoned in Dunstaffnage and Dunollie castles in 1652.
- The Glen Coe massacre in 1692.
- Joseph Banks revealed Staffa to the world in 1772.
- Mendelssohn composed his “Fingal’s Cave” Overture in 1829.

The railway arrived in Oban in 1880; this opened up the western seaboard to commerce and tourists, and the boom of the Victorian era leading on to today’s modern culture, with tourism still the dominant economic activity.

The Modern-day Mid West Coast

Tourism is by far the largest and most important industry throughout the mid Scottish West coast. Further inland to the south, Forestry Commission activity gains in importance. Inland to the north the landscape becomes more mountainous and wild.

Coastal fringes to the north and west tend to see an increase in aquaculture industries and in the Western Isles tourism is replaced by textiles and fishing activities.

The hub of the area is undoubtedly Oban, known as the “Gateway to the Isles”.

Construction of the second link-span in Oban by Caledonian MacBrayne Ferries provides for a potential increase in tourist related traffic. Oban is in effect the mid point between large population centres such as Glasgow and Inverness. With today’s infrastructure the area has become an ideal “getaway” location for the inhabitants of cities such as Edinburgh. Secondary access can be through several routes to the north and south depending on the actual boundaries of the proposed park.

Research has indicated that it is the “green or eco” tourism that is developing and should be encouraged due to its sustainability. This is true green and eco tourism not just that with a “green” label. The reasoning behind promoting this type of tourism is that in general high levels of revenue are injected into the region and potentially it has the ability to extend outside of the normal summer holiday period. Unrestricted expansion of mass tourism could have a detrimental impact on the local communities, habitats and fauna and flora as well as failing the “conservation aims” of the National Park (Scotland) Act 2000.

The region has the ability to expand in sustainable, environmentally friendly, tourist interests such as sea kayaking, yachting, diving, angling and wildlife viewing trips. All of these activities require supporting industries such as hotels, restaurants, shops and services. Combined, these activities have the capability of increasing the GDP and with time could make a CMNP self-supporting, but they rely heavily on Scotland’s greatest asset: its environment and wildlife.

Fishing and aquaculture

Inhabitants of the small rural and island communities often depend on several sources of income to survive and income is generally much lower than in the cities. Few of the towns and villages actually depend wholly on fishing with the exception of Mallaig to the north. Here the fleet is more pelagic and therefore would be less affected by the establishment of a park.

Parts of the fabric of the local community, however, are the small, often single handed fishing businesses. These tend to be the “creel boats” and divers, although not exclusively so, and collectively offer the most sustainable and environmentally friendly method of fishing. **With strategic siting of “no take zones” taking into account local knowledge, these fisheries should not be affected, and in fact could well benefit from zoning. This necessitates that a CMNP must be large enough and extend out to the twelve-mile zone. Such an area should benefit local businesses, especially those in the fishing industry.**

Protection of Local Fisheries

As fishing effort increases the West Coast will come under increasing pressure from vessels outside of the area. Galloway fishermen have already witnessed the destruction of local agreements and fisheries wiped out by the “supercrabbers” from the south. Sustainable fisheries on the West Coast need to be protected from such industrial

scale activities. With the freedom to act and to regulate a National Park Authority could enable the environmentally friendly, local sustainable fisheries to prosper. This could well see the return of the angling competitions of the past, and record catches in both size and quota.

Control of fishing activities within a CMNP should NOT be the sole responsibility of the Inshore Fishing Groups (or their future replacements). To appease pressures from the fishing industry, no take zones could fall under the NPA, other areas less environmentally important could be managed by the IFG's. The NPA must have full powers on any fishing management group.

Aquaculture especially that of intensive finfish farming has in recent years become far less of a burden to the environment. There is however no room for complacency and many aspects still need urgent attention; these areas include escapees, lice treatments, predator control and pollution in restricted tidal areas. As these fish farms strive towards ultimate efficiency the numbers of local people being employed decreases dramatically, and more emphasis could be encouraged towards polyculture and small sustainable units scattered throughout the communities with local agreements on potential siting.

The Land Element

The land area to be included is somewhat open to conjecture but in doing so it is of vital importance to remember that land run-off and most of any pollutant enters our local waters. It is partly for this reason that any major town close to the proposed area should be included. It has been suggested that the "watershed" or rainfall catchment area should be considered, but hopefully much of this area and its associated run-off problems will be accounted for within the Water Framework Directive. If this is the case, then it is vital that the NPA have a permanent position with voting rights on any related panels, committees etc.

Natural features, conservation and Scenic Areas and historic sites situated on land, close to the proposed park should be considered for inclusion. Where striking examples occur close to each other the creation of a "link" could be highly desirable, for example, Loch Etive which receives more fresh water than any other sea loch in Scotland with the beautiful Glen Etive and to include the mountainous region leading down to Inver Creran and the National Scenic Area of Glen Coe. This would provide a superb example of watershed to sea transition. The inclusion of Loch Awe as the main freshwater input into Loch Etive and the main route to the "Gateway to the Isles" would conveniently contain the link and boundary to the sea and create a natural corridor into the proposed park area.

With in excess of one third of Argyll land area subject to Forestry Commission activities, more attention should be given to harvesting areas and the associated increased run-off that may result in pollution problems from cleared land and cause an adverse visual impact in Scenic Areas. Water quality is paramount for many industries along the Scottish west coast from shellfish aquaculture to scuba diving.

Boundaries, Powers and Local Involvement

The inclusion of more than one Local Authority boundary within the proposed area could be of benefit and need not be a disadvantage as the Cairngorm National Park has demonstrated. Within our proposed area this would include Argyll and Bute and Highland Councils, and, depending on the western limit, could include Western Isles Council as well. The inclusion of more than one local authority may also allay the fears that the Councils may seize upon the CMNP as a tourist “honey pot” to increase revenue, if this were to occur it would undoubtedly result in the failure of the conservation aims of the National Park (Scotland) Act.

There is an apparent danger of weakening the powers of any NPA, where existing or revised legislation has potential to “cross-over” into separate or different agencies. This would allow for the continuance of mis-management through communication breakdowns and different agendas. An NPA must be in a powerful position in these situations, as failure will probably result in the downfall of the CMNP designation and the creation of a “theme park” which once again would fail in the conservation aims of the National Park (Scotland) Act. To some extent the effect of reduced powers to a NPA has already been realised in the Cairngorms National Park. Here the NPA is unable to serve TPO’s or designate conservation areas or serve Article 4 Directions in its own right because it is not a planning authority.

To be effective, any National Park Authority must have full powers throughout its area of remit. This could be relaxed to appease resistant councils by effective zoning. No take zones, as recommended by the Royal Commission’s Report “Turning the Tide”, could fall fully under the NPA, commercial zones or less environmentally important areas could remain under the auspices of the local councils with input from the NPA.

We also believe that, because of the complexity of marine issues and concerns by local communities, more local involvement on the NPA would be beneficial and show “openness”. We cannot emphasize too strongly that whether the CMNP is seen as a success is dependent on the acceptance and support of those living and working within the area, and the extent to which they feel they have significant involvement in decision making.

We would therefore suggest that the NPA be made up of equal sectors: government, local officials and members of the general public: eight, eight and eight with an independent chair.

Local concern and involvement in marine related issues is evident by the formation of new groups such as the Hebridean Partnership, the Archipelago Forum and Loch Melfort Trust. Several questionnaires and on-line surveys have returned positive results for the establishment of a MNP or CMNP in the Mull/Oban area. The Hebridean Partnership, Mull and Iona Community Trust and the Oban Times conducted these. A general opinion throughout the Hebridean Partnership questionnaire was that, “Something needs to be done”, concerning the marine environment.

2006 has seen an increase in a well-funded, well-connected “anti-lobby” being established. Members of the Hebridean Partnership have witnessed intimidation methods and further reports have been notified to us, although it must be stated that these additional reports are hearsay. Some static gear fishermen feel intimidated by the mobile sector. The activities of the static gear sector should be in keeping with the lines and aims of any potential CMNP. Yet they appear to have been persuaded that any new legislation will be applied to them and a loss of revenue will prevail. The result is that very few are willing to indicate a positive interest in the establishment of CMNP’s.

The effect of this anti-lobby’s propaganda has been to “silence” many members of the general public, some of whom feel that they do not know enough to comment, especially when dealing with those with commercial interests. There remains however a very real need for more information concerning the proposed CMNP. Many people are simply not informed enough to give a valid opinion. This has been confirmed by several local polls run by the: Oban Times, Mull & Iona Community Trust and the Hebridean Partnership. All of the polls indicate an “in favour” of CMNP’s BUT they also include an unacceptable level of “Not Sure’s” and “Don’t Know’s”, up to one third in one poll. A question of potential bias must also be considered when a local media group includes both fishing and aquaculture publications. The need for further information was witnessed at the “Stakeholders” meeting, held in December 2006, at the Gathering Halls in Oban, where experienced operators and local councillors requested, more information and stated that they were not in a position to comment on questions raised by the Scottish Executive. Research has indicated that is not a negative view concerning CMNP’s but a plea to be better informed. Local knowledge has shown this needs to be on a national scale using multi-media formats.

Scale of Area – General Comments

The marine aspect to the National Park scenario within the British Isles is a new concept, and as such should be considered with “open minds” and utilise an up to date knowledge of marine ecosystems. Particular attention needs to be applied to the state of current commercial fishing stocks and the potential for aquaculture industries to adversely affect vulnerable areas. **It is for these reasons that any potential CMNP should be large enough to be able to cope with the probable increase in tourism and sustainable expansion of the tourist support industries.**

Experience from around the world has shown that Marine Protected Areas are one of the most successful methods of achieving a balanced final product. A CMNP large enough to incorporate MPA’s or “no take zones” would benefit both the environment and local economies. In the Royal Commission Report, the “Turning of the Tide” indicated that thirty percent of an area would be required to assist in the replenishment of commercial fishing stocks, and we would suggest the minimum considered area be at least ten percent to allow for the extra pressures that would undoubtedly accompany any CMNP designation. This would allow for all of the aims of the National Park (Scotland) Act 2000 to be fulfilled.

With this in mind and to avoid undue impact to the inshore fishermen the outer extent of any proposed CMNP must extend out to the 12-mile limit.

Education and Information

Hebridean Partnership has been campaigning for the establishment of the MNP or CMNP along the mid west Scottish coast for a number of years. During this time we have experienced several problems in putting forward our views for various reasons, including the public's perception of a "Marine National Park" or CMNP.

We feel that there is a need for a continuing programme of clear information, education and widespread consultation in any areas that are short-listed. This is particularly important in those sectors of the economy, which are the mainstays of local communities. Residents and actions affecting people's lifestyle need to be considered, these people must be considered as "stakeholders" and be allowed to participate in future management processes.

As the CMNP process develops more and more people are becoming involved, some for the first time. Many people are fearful that the process has already been finalised. Some are angry that they were not consulted. Whatever the reasons, these fears and views are very real to the individuals concerned. Much of the "against CMNP" feeling has stemmed from this lack of full information. Further to this there appears to be a growing number of people who previously were "not sure", now "against" due to what they perceive as poor management from the Scottish Executive. It is for these reasons that a full education programme must be initiated before the final area is chosen. There are already many television programmes that show the success of Marine National Parks and the use of No Take Zones. UK success stories such as the MNR at Lundy and the scallop project in the Isle of Man could also be cited as further examples.

The rural and island communities in Argyll and the Islands including Ardnamurchan and the Small Isles are faced with many additional challenges to everyday life especially in communications, access and additional expenses. The region could greatly benefit from a CMNP designation and increase potential local economies well into the future, whilst protecting Scotland's most important features... its natural environment and wildlife.

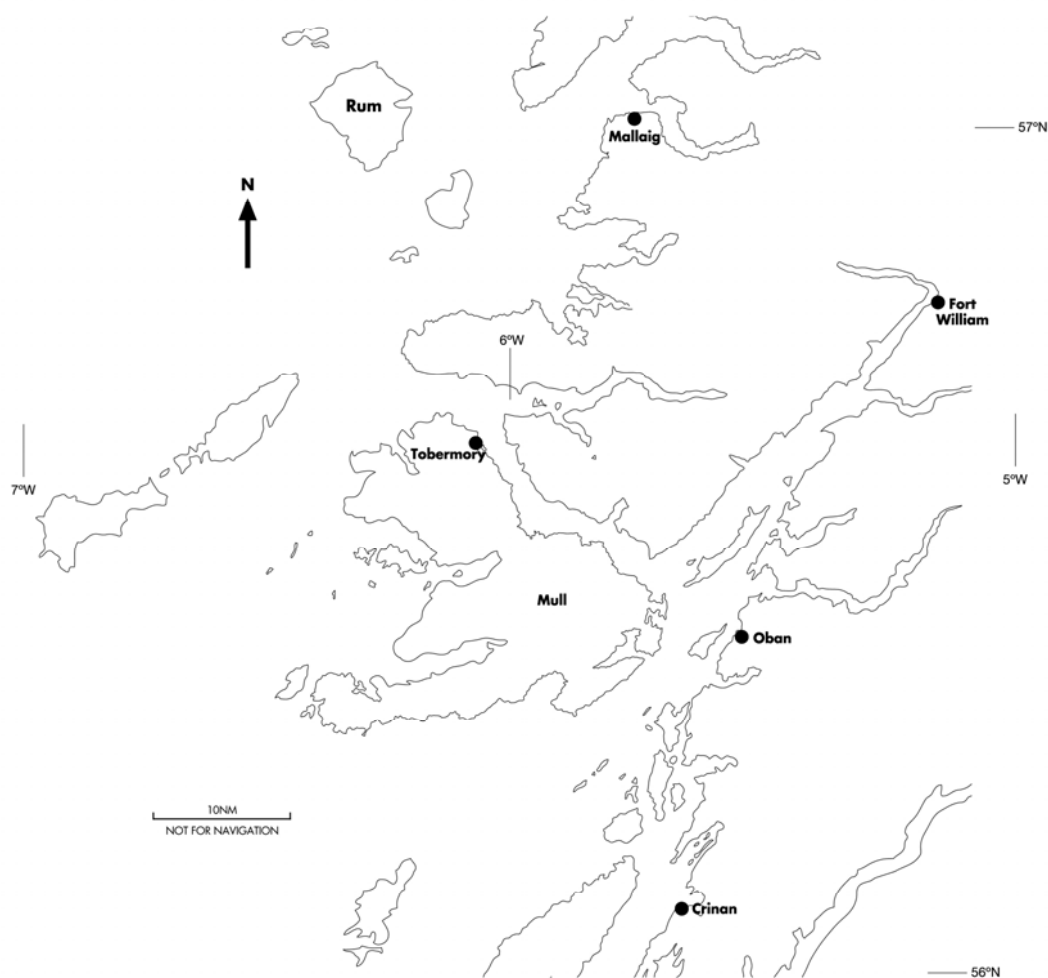
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The information has been supplied by members from various backgrounds, and has been approved by committee for open circulation. For further details please contact the

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Annex One

HEBRIDEAN MARINE NATIONAL PARK PARTNERSHIP



The Combined SNH Option Including The Mainland
Sea Lochs And Oban As the “Gateway”.

**Area Proposed by Hebridean Partnership For
Scotland’s first Coastal and Marine National Park**