

Scotland's First Coastal and Marine National Park: A Consultation

January 2007

Introduction

The Federation of Small Businesses is Scotland's largest direct-member business organisation, representing over 19,000 members. The FSB campaigns for an economic and social environment which allows small businesses to prosper.

The FSB represents a wide range of small businesses based in coastal areas in Scotland and it seems likely that many of these businesses would be affected by proposals for a coastal and marine national park. Since the proposal is at an early stage, our comments represent the wider small business perspective though it is clear that some sectors will be more acutely affected than others.

Chapters 1: Benefits

It would not be unreasonable to suggest that there is a degree of scepticism about the potential benefits of a coastal and marine national park to local small businesses. That is not to say that businesses are blind to the potential opportunities which could arise if the national park results in improvements to the area – most notably in the area's infrastructure. This success would, however, require a commitment of resources for the area.

There are also real concerns about the downsides of a national park, particularly about restrictions that could be placed on activities of existing businesses. In addition, there does not seem to be a clear idea about existing problems and how, and why, a national park would solve these. Indeed, in trying to present a blank canvas to allow proposals to develop through consultation, the Scottish Executive runs the risk of leaving the concept so vague as to be impossible for businesses to have any concrete proposals on which to comment. It seems clear that, in light of this consultation exercise a great deal more local consultation with local people is required.

Chapter 2: Location

We have no view on the best location of the park however the same concerns appear to be present in all the potential locations.

Chapter 3: Functions, Powers and Governance

In light of general concern about the potential powers of the park the most sensible approach would appear to be to have a 'light touch' park authority which is largely a co-ordinating, rather than regulatory, body. This would certainly rule out the option of the park becoming a planning authority; this power should remain with local authorities. Much of the potential for conflict with local businesses arises around the role of conservation and recreation management. Further discussion on the likely impact of this i.e. possible outcomes for different activities, likely changes in responsibilities, is required – particularly with sectors likely to be affected.

The principles for the establishment of the Park Board are broadly correct however it is important to ensure that the Board is not top heavy with national appointments. 'Local' appointments should also be drawn from a range of different groups e.g. representatives from conservation bodies, small businesses, fisheries etc.

We note that there is further work to be done on the Regulatory Impact Assessment (RIA). It would be helpful to see some illustrative examples of changes that might occur for certain activities, e.g. recreational or fisheries, in the event that a national park is introduced and the cost implications of these changes. Without concrete examples it is impossible to provide any meaningful impact assessment on which to base informed decisions. It is also helpful to have these examples to provide some kind of baseline measure in reviewing the development of the park (particularly if there is to be a phased development). In addition, it does seem that the 'do nothing' option in the RIA has not been fully explored. It is surely possible that a variety of actions could be undertaken to achieve objectives or solve problems i.e. establishing a national park is not the only way to increase tourism. Whether or not these other actions would be as effective as establishing a national park can be drawn out in the RIA.

FSB Scotland would be happy to work further with the Scottish Executive to facilitate discussion with local businesses in the affected areas.

For further information on any of the points raised in this submission, please contact Susan Love, Policy Officer, on susan.love@fsb.org.uk or 01259 723713