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Mr Jeff Coast
Protected Landscapes Team
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Bristol
BS1 6EB

Email response sent to: npgovernancereviewconsultation@defra.gsi.gov.uk

Dear Mr Coast,

Response to consultation paper: Consultation on the Governance Arrangements for the National Parks and the Broads

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing around 23,000 spatial planners. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

This response has been formed drawing on the expertise of the RTPI Environmental Planning and Protection Network's Biodiversity and Countryside Management Group.

Enclosed is the RTPI's response to the consultation.

If you require further assistance, have any queries relating to the enclosed or require clarification of any points made, please contact the Planning Policy and Practice Team on 0207 929 9466 or email policy@rtpi.org.uk.

Yours sincerely,

Matt Thomson
Head of Policy and Practice

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Introduction

In line with the emerging localism agenda from the Coalition Government, this consultation seeks 'to review the governance arrangements of National Parks in order to increase local accountability'. It provides a remit for the Review on which each National Park authority will be required to base its own local consultations.

The key point which must not be lost sight of in any review is the fact that the National Parks and the Broads are national assets, designated for the country as a whole under long established legislation. This 'national asset' status should remain paramount in any deliberations and discussions and must remain the default position in any conflict situation.

Support should be given for the retention of independent authorities for the National Parks/Broads (NPAs), including their status as local planning authorities for their areas.

Purpose of the review

Whilst agreeing that ways should be looked for in which the governance of the NPAs can be made more effective, it would have been helpful to define what was meant by the term 'effective'.

There is agreement over looking at ways in which the NPAs can be more responsive to the concerns of their local communities, whilst retaining the existing statutory purposes and the Spending Review 2010 budgets. The impact of the budgets is not made clear in the consultation, but must be born in mind in any proposals that are put forward.

There is agreement over the extent to which different arrangements are appropriate for different NPAs, thus stressing 'local distinctiveness'.

Key questions that the Review should seek responses on

a) Whether membership of NPAs, both the size and composition, should be changed.

There is some indication that NPAs should be reduced in membership to around 18, based on the amount of work available for members to do in helping to direct the Chief Executive. It may be that a flexible figure would be more appropriate depending on the nature of each NPA, with some of them clearly having larger workloads than others.

b) Whether the selection process for all categories of members of NPAs can be improved

The appointment of people identified as having a national interest in landscapes/biodiversity, by the Secretary of State, can remain largely as it is now. In the case of parish councils, it would be better if they were to be directly elected and accountable to the local population, rather than be nationally appointed by the Secretary of State as experts on community matters, rather than representatives of their own parishes.

That leaves members appointed by local authorities in which the national park lies. While some sources have suggested that perhaps the Secretary of State should appoint these members from a pool of local authority members, it might be more in tune with democratic accountability for the

relevant local authorities, who play important parts in the running and management of economic, environmental and social services within the national parks, to continue to be responsible for member appointments.

c) Whether there should be a limit on the length of time which local authority and parish members can serve, and a reduction in the maximum term for the Secretary of State 'national' members (currently 10 years)

It has been suggested that all members should be restricted to a term of 6 consecutive years, with a 3 year break between periods of service. This would help freshen up membership and get away from situations in which some local authority appointees have been in position for 20 years or so. How can newly appointed national members make much of an impact when faced with such clearly entrenched members?

d) Whether the current membership and structure of consultative committees, groups and forums can be strengthened so as to better achieve 'Big Society' benefits

Each national park has different needs, with contrasting communities and groups and particular interests such as navigation or the armed forces. Perhaps smaller and more manageable committees, groups and forums will help move NPAs in this direction, while the holding of an annual conference of representatives from all interested stakeholders (presenting an annual report) might help focus on key issues and concerns and provide an opportunity to sit together and discuss them.

e) What additional measures NPAs can take to strengthen the links and engagement with their local communities on a variety of issues including planning

There is a strong feeling that there are already sound and effective links between NPAs and 'their' communities, in line with good planning practice elsewhere across the country. Local communities do seem to generally support national park policies, provided that they are applied fairly and consistently across communities as a whole. One area where this does appear to be something of a problem, is within the appeal process. The Secretary of State/Planning Inspectorate regularly set aside national park policies and this can only serve to undermine the credibility of NPAs. Perhaps this consultation can provide a useful opportunity to fully analyse planning appeal results for the national parks/broads and assess the impacts of such results?

Other measures might include an annual stakeholder conference, which would encourage greater engagement, together with more emphasis on local surgeries run by locally elected members, at which people can express their concerns and ideas.

Perhaps another area might be to encourage parish/village plans within the national parks, as part of the local development framework (LDF) within the planning system. Many of these already exist and contain much good practice of community engagement. This needs to become a statutory part of the planning system, currently being considered for change within the Localism Bill. Organisations such as Planning Aid and CPRE (Friends of the Lake District) are also active in community engagement within national parks.

f) Whether there are any other ways in which the NPAs can improve their effectiveness and

accountability

One suggestion is a greater use of annual reporting to set out what has been done with the resources available, ensuring that this information is freely and widely available in an understandable way for both local and national communities.

Other issues and concerns

There have been concerns that any changes might promote more economic development at the expense of conservation (The Guardian, 12th November, p4 'Conservationists warn of threat to national parks').

Might a localism agenda undermine the purposes of the national parks and create a threat to the paramount purpose of conservation? Perhaps the Scottish model offers some useful insights into alternatives that retain national parks as 'national', whilst encouraging a 'local' voice through the direct election of some members.

Should the additional duty to seek to foster the economic and social wellbeing of local communities become a statutory duty rather than an additional duty? Retention of the Sandford Principle, albeit refurbished for the 21st century, ought to prevent this from happening. In Scotland, the Sandford Principle applies to all the purposes of Scottish designation, thus making all development (including economic development) subservient to conservation. However, how well is this working since conservation duties may have been set aside too easily over some developments such as the national grid power line in the Cairngorms, mining in Loch Lomond and the Trossachs, and the out-of-town shopping centre at Balloch on the shores of Loch Lomond?

There is also a problem over the International Union for the Conservation of Nature (IUCN) and the classification of protected landscapes. England and Wales may lose all international recognition for protected landscape designation because we are considered to have watered down the conservation/protection policies for nature. This matter must be an important consideration when examining governance arrangements for the National Parks/Broads.

Conclusion

There are clearly measures that can be taken to improve on the existing governance of our National Parks/Broads. However, it is important to stress the importance of continuing to protect (both nationally and internationally) this key national asset.

It may be a useful time at which to examine not only the reasoning why NPAs are vital to the continued protection of National Parks/Broads, but also the critical application of the Sandford Principle and appeal decisions. It is now some time since the last National Parks Review Panel (Edwards, 1991) and it may be that 2011 is an opportune time for a 20 year 'update' to identify strengths, weaknesses, opportunities and threats?

There seems little doubt that our National Parks/Broads need to evolve and adapt to new challenges such as climate change; changing lifestyles; the pressures of agriculture, natural resources and biodiversity, and current austerity measures. However, it is essential that we remain true to the statutory purposes of national parks in underpinning their communities and

landscapes/biodiversity, in order to ensure their longer-term success as working areas with strong landowner/ land manager inputs. Given the limits imposed by spending cutbacks, it would seem sensible to change only what we have to at present and to retain all wider options for the future, rather than do away with them now. An evolutionary, rather than a radical agenda seems by far the best way forward.