

Consultation on Draft Circular on the English National Parks and the Broads (November 2009)

Views on behalf of the Cumbria Association of Local Councils.

- 1. The Cumbria Association of Local Councils is the membership association that represents the interests of town and parish councils and parish meetings in Cumbria. The Association only became aware of this consultation last week, so it has not been possible to consult with our member councils. The views below are therefore my officer views, as Chief Officer of the Association, based on my experience of working with parish councils in the National Parks and my participation in the Lake District National Park Partnership.*
2. The first point to be made, regrettably, is that the consultation on this draft Circular is seriously flawed. The list of organisations that have been consulted shows that no effort has been made to consult with communities or with bodies representing communities, like parish councils. The draft Circular is providing the Government's policy guidance for the future of our National Parks to 2050 and is therefore of great importance to communities within the Parks. An effective route to consult with those communities should have been found. Since the introduction of the Local Government and Public Involvement in Health Act 2007, a wide range of public bodies now have a 'duty to involve' and it is regrettable that the spirit of this duty has not been followed by DEFRA. For a draft Circular of this importance to simply be sent out to a range of stakeholders for comment is not 'involvement' and represents a very outmoded approach to stakeholder and community engagement in the 21st century.
3. Turning to the substance of the draft Circular, there is much that I would commend and support, particularly the attention given to sustainable development and the impact of climate change and the recurring theme that National Parks are special places and must be understood by everyone to be so. In the following paragraphs I would like to suggest a number of ways in which I feel the Circular could be improved.
4. I feel that the opportunity has not been taken to present updated Government policy guidance to *all* public bodies involved in the management of the National Parks. In the Lake District, for example, the NPA is very important for its leadership, co-ordination and planning roles, but in terms of the overall environmental, social and economic management of the Lake District as a 'place' there are bigger players in terms of resources and land management, such as Cumbria County Council, National Trust, Natural England, Forestry Commission, Environment Agency – and in the private sector United Utilities and landowners. Although these other bodies are referred to in the Circular, the document appears to be primarily aimed at the National Park Authorities and this means that 'joined-up' policy guidance across public authorities is not provided and messages about co-ordination and partnership working do not come across as strongly as they might.
5. In the Lake District we have a fledgling Lake District National Park Partnership, chaired by Lord Clarke of Windermere. This is a partnership which promises much for the future and it would be highly beneficial to the

partnership's development if the Circular were to provide an equal measure of guidance to *all* the public sector players and impressed on them the need for strong commitments to partnership working – and community engagement, which refer to again below.

6. The draft Circular gives the impression that it is uncertain about how to present policy with respect to the people and communities within the National Parks. There is a lack of clear guidance. This perhaps has its roots in the less than clear statutory position where the NPA's duty to foster the well-being of communities is to be undertaken when pursuing two overriding statutory purposes – conservation and public enjoyment. The Circular is an opportunity to provide clarity about the obligations of public bodies with respect to the well-being of communities within National Parks, but as currently drafted it does not.
7. In the summary of the Vision for National Parks at paragraph 26 and in the Annex, there is not a clear vision statement about the Park's communities in 2050. Communities are referred to, but often in a tangential or partial way. The Vision needs to answer the question - what sort of places in economic, social and environmental terms will the Park's communities be in 2050? A clear, focussed statement is required.
8. In section 7, the Government's priorities for the Parks are largely expressed on a topic basis and focus on the NPA's responsibilities. This means that there is no expression of a holistic, multi-agency policy approach to the needs of local communities over the coming decades. The Circular does not explicitly recognise that many communities in National Parks are in decline in terms of vibrancy and local services and the Circular fails to convey a set of integrated policies that public authorities should pursue. This means that the paragraphs on rural economies and affordable housing, for example, come across as very lame because they fail to articulate the multi-agency approach required and how different policy initiatives need to be implemented in a way that support each other.
9. A final point is that the Circular would be improved if a section were added on public and stakeholder engagement within the context of the NPAs' and other public bodies' statutory 'duty to involve' and the Government's National Indicator 4 – “% of the population who feel they can influence decisions in their area”. All public bodies working in National Parks should be required to adopt up-to-date, best practice community engagement techniques. In particular, the general public should always be afforded the opportunity to engage during the preparation of draft policies, plans and projects and not just after draft proposals have been prepared. Public bodies, particularly the NPAs, should also be encouraged to give every support possible to the preparation and implementation of Community Plans.
10. I hope the above observations are of assistance.

Guy Richardson
Chief Officer, Cumbria Association of Local Councils
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