

DIRECT ELECTIONS TO NATIONAL PARKS

An assessment of the need for direct elections to National Parks

Summary

1. The Consultation report does not provide complete and accurate information on how the current arrangements for the membership structure of National Park Authorities were devised; in particular, it fails to mention that the Conservative government in 1995 were 'sympathetic' to direct elections of local representatives but considered that there were practical difficulties; it also suggests that the Edwards Report which the present membership structure is based upon, had considered that direct elections 'would not bring any benefits' – this is inaccurate and is not a conclusion of the Edwards Report. Because of the Consultation's incomplete and inaccurate content, it does not provide an adequate basis on which to assess the need for direct elections. The Consultation report should therefore be revised and re-issued for a further round of consultation.
2. The Consultation report draws attention to the practice of direct elections to National Parks in Scotland, but fails to set out the reasons why this practice was established. Research contained in the accompanying Report reveals that the Scottish Parliament's main concern was to ensure that local people were properly represented. A survey of residents of the National Park areas carried out by the Scottish Executive on the original Bill's proposed membership structure of local authority and Ministerial nominees revealed that 64% of respondents supported direct elections or more local representation. This survey response echoes the Edwards Report which found that 'local people consider that their interests are not properly represented'. This response therefore concludes that the focus of the Defra Consultation should not be on 'whether directly elected members would aid or hinder the decision making process and/or strategic functioning of the National and Broads Authorities', but whether local residents are properly represented in the decision-making structures of these Authorities.
3. The Defra Consultation also fails to identify the differences between the objectives of the National Parks in England and Scotland. The Scottish Parliament determined from the very initial stage of its proposals for establishing National Parks that the objective 'To promote sustainable economic and social development of the area's communities' should be balanced with objectives for conservation. This is not the case in English National Parks where the objectives set out in the Environment Act, 1995, focus on conservation and environmental education, while the National Park Authorities only have a duty to foster social and economic well-being when 'carrying out the two main responsibilities'. This response argues that the relegation of the need to foster well-being to a duty rather than it being an

objective as in Scotland has led to the alienation of local residents from the National Park Authorities. The response therefore calls for the fostering of social and economic well-being to become a third objective within an overall aim of securing the sustainable development of the Park areas.

4. The status of English National Park Authorities is unclear. The Consultation report states that they are independent with a membership structure similar to joint local authority committees and planning boards. A recent study by Nicola Thompson of Newcastle University suggests that they 'defy easy categorisation'. She states that they are 'free-standing local authorities, possessing some of the functions of conventional local authorities', but they also have 'many of the characteristics of non-departmental government bodies'. In contrast Scottish National Park Authorities are non-departmental government bodies accountable to Scottish Ministers and Parliament. It is unclear to which body the English Authorities are accountable. They are not accountable to Parliament – but they must account for their performance to Defra. They are not accountable to local authorities and certainly not to local residents. This response argues that as the Prime Minister in the Empowerment White Paper states it is a priority 'to make our institutions more accountable'. If as the White Paper argues local authorities are 'at the heart of local democracy' there is a need to extend democracy to national Park Authorities so that they can be held to account by their residents, just like any other local authority. This response therefore concludes that direct elections of local residents should be held to guarantee, as in Scotland, local representation, while national and local authority nominees should continue to provide the majority of the membership of the National Park Authorities.

THE MAIN REPORT

1. Introduction

In July 2008, Defra launched a Consultation on the issue of whether direct elections to National Parks 'would aid/hinder the decision making process and/or strategic functioning of National Park and Broads Authorities' (page 1). The Consultation report sets out the current governance arrangements, including the balance of membership of National Park Authorities (NPAs) and the process of selecting members. It also 'evaluates the principle of direct elections' (page 1), and sets out the 'main arguments for and against direct elected members', and draws comparisons with and lessons from direct elections to Scottish National Parks.

In response, this report argues that Defra's Consultation report does not adequately 'evaluate the principle of direct elections'; in particular, it fails to position its evaluation in the context of the Government's arguments and

policies for greater accountability set out in the Empowerment White Paper¹. Moreover, it does not present a fair, accurate and balanced basis on which consultees can make a considered judgement of the merits or otherwise of direct elections. It is the view of this report that Defra:

- has not provided sufficient and accurate information on which to assess any proposal for direct elections;
- has set the issue in the wrong context: seeking views on whether direct elections would aid or hinder the decision making process and strategic functioning of the NPAs, rather than whether communities and residents of the National Parks are adequately represented in the decision making structures;
- has not adequately explained the reasons for the introduction of direct elections in Scotland and for the differences in the objectives between Scottish and English National Parks;
- has not explore the issue of direct elections in the wider context of the policies promoting empowerment;
- and finally, has asked closed questions which do not invite respondents to inform Defra of the reasons for their responses or to offer alternatives and elaborations in their assessment of the issue.

2. The justification for the current membership arrangements

An Annex to the Defra Consultation sets out the history of the arrangements governing membership of National Park Authorities (NPAs), which have resulted in the present structure of 22 members²; 6 members (8 on the Peak District NPA, and 10 on the Broads Authority) are appointed by the Secretary of State, while 12 (16 on Peak District NPA and 9 on the Broads Authority) are nominated by local authorities and 4 (6 on Peak District NPA) by parish councils (but none on the Broads Authority, which has 2 nominees from the Navigation Committee). The current arrangements were conceived as part of the proposals for the reform of National Parks in the Edwards Review³ in 1991 and sought to provide a consistent structure of independent (from County Councils) National Park Authorities. The Review advised that the NPAs would need to reflect their national as well as local responsibilities, and therefore that their membership should contain a balance between Secretary of State and local authority appointees.

What the Defra Consultation fails to acknowledge is that the proposals in the Edwards Review for a membership structure of Secretary of State and local

¹ CLG (2008) *Communities in control: real people, real power*. Cm 7427. London, The Stationery Office.

² Two exceptions are highlighted in the Consultation, of the Peak District NPA having a larger Board of 30 members and the Broads Authority with 21 members.

³ Edwards, R. (1991) *Fit for the Future: Report of the National Parks Review Panel*. Cheltenham, Countryside Commission.

authority nominated representatives was rejected by Parliament. In 1995, the Conservative Government in seeking to incorporate the Edwards Review recommendations into its Environment Bill, accepted the views of MPs in Committee who had expressed concern that local people – those living in the National Parks - would not be represented on NPAs. Indeed the Edwards Review (p96) highlighted that *'local people consider that their interests are not properly represented'*. It was in this context that the Government proposed a compromise of including a proportion of parish council representatives at the expense of some of the local authority nominated members. This was adopted and included in the 1995 Environment Act.

In the House of Commons Debate and at the Committee stage, a number of MPs had pressed for direct elections. The Government Minister, Robert Atkins, responded to that proposal:

I am sympathetic to the comments of hon. Member for North Cornwall (Mr. Tyler) on direct elections. His hon. Friend the Member for Truro (Mr. Taylor) will doubtless have told him that we are sympathetic to that proposal. There are problems - he glossed over them. Some parishes are not, for example, wholly in a national park area and therefore there are difficulties about electoral rolls, but I have not ruled it out. One would want to try, if possible, to encourage that. I know that my hon. Friend the Member for West Derbyshire (Mr. McLoughlin) agrees with it. The proposal is, however, more difficult than I can allow at this point.⁴

It would therefore appear that Parliament was sympathetic to direct elections of local residents and that the nomination of parish councillors was accepted as a second best, simply because direct elections were not regarded as practicable.

The Defra Consultation report is quite misleading in suggesting that the Edwards Review (1991) had concluded *'The concept of Direct elections was dismissed on the grounds that it would not bring any benefits'* (p9). In fact the Edwards Review⁵ did not support direct elections because:

- 1. While such [wholly elected] authorities would – at least in theory – meet the demands for local accountability the spectrum of interests thus represented would be most unlikely to match the needs of and to serve the long-term national interests;*
- 2. An alternative approach to include some directly elected members within more widely constituted authorities does not find favour on grounds of practicality and the confusion it might cause to the local electorate.*

⁴ Hansard, House of Commons, 28 June 1995, Col 1022-23

⁵ Op.cit.: page 97

The suggestion on page 9 of the Defra report that direct elections were dismissed because of the lack of benefits is a serious misrepresentation of the Edwards Review which is likely to have had an influence on the responses to the Consultation.

Moreover, the Consultation fails to mention the reasons for the decision of Parliament to include parish members or that there was government sympathy for direct elections. The Consultation does not therefore provide a complete and accurate account of the development of the current membership arrangements and seriously misrepresents the views of both the Edwards Review and of Parliament. In view of the fact that the Scottish experience has shown that the Conservative Government's and the Edwards Review's objections to direct elections – that they would be difficult to put into practice – are now groundless is reason enough to review the current membership arrangements and to assess how 'local people can be more properly represented'.

The Scottish experience

The issue of direct elections to support the governance of National Parks has been raised by MPs on a number of occasions since the Environment Act and they have drawn on the experience in Scottish National Parks where 20% of the membership of NPAs is elected directly by residents of the Parks. The Consultation therefore makes some comparisons with Scottish National Parks but only includes matters relating to the operation of these elections and does not identify the reasons or the justification for the Scottish Parliament's support for direct elections.

The proposal for direct elections to Scottish NPAs was not originally included in the National Parks (Scotland) Bill in 2000. This Bill was brought forward by the Scottish Executive to create new legislation to enable Scotland's first National Parks to be created. It was only at the Committee stage that proposals for direct elections of a proportion of the members of NPAs were debated.

The Rural Affairs Committee of the Scottish Parliament was advised by the Scottish Natural Heritage which concluded:

"Our research picked up issues that can be simply articulated. If local people are not involved in the management of these places, tensions can build up. The lesson from elsewhere is that to have a successful Park,

*local people have to be involved in its governance and management. That is part of our advice."*⁶

In response, the Scottish Executive identified practical difficulties in implementing any proposal for direct elections – namely, that there would be difficulties in identifying key community areas [i.e. electoral areas] with such a dispersed population in the Park areas. However, the Rural Affairs Committee (the Convenor of which was the Conservative MSP, Alex Johnstone) considered a number of different options including the nomination of Community (parish) Council representatives. In conclusion, the Committee agreed that *the principle of direct representation of local community interests should be guaranteed, and distinct from both the local authority nominees and those directly appointed by Ministers.*⁷

The Executive consulted on its original draft proposals contained in the Bill and found that 64% of respondents called for either direct elections or more local representation. In debates, MSPs⁸ emphasised the importance of the involvement of local people in the planning and management of the Parks:

Local involvement is especially important because, although national parks are for the benefit of the nation, we cannot ignore the interests of those who live and work in national parks (SNP MSP).

*The bill now contains a truly innovative and radical measure. I refer, of course, to the direct election of local people to the national park authorities. That will go a long way towards reassuring local people who live and work in the proposed national parks that their interests will not be forgotten in what will be parks for the whole nation. (Lib Dem MSP).*⁹

We must also have community representation, so that there is ownership and involvement. (Labour MSP)

For national parks to succeed, it is essential that they enjoy the backing and support of the communities that live and work inside the parks (SNP MSP).

⁶ Scottish Parliament, Rural Affairs Committee, Official Report, 29 February 2000, Col 440.

⁷ Scottish Parliament, Rural Affairs Committee, Stage One Report on the National Parks (Scotland) Bill, Vol 1, para 39.

⁸ Members of the Scottish Parliament.

⁹ The two quotes above are from Scottish Parliament Official Report, 5 July 2000, Cols. 1129 & 1132.

These are national parks; they will need a diversity of expertise and experience and a mix of local community and national knowledge and expertise. (Member of the Scottish Executive)¹⁰

Discussion in the Scottish Parliament throughout consideration of the Bill accepted the need to ensure that local interests were fully recognised. In particular, there was a concern to get the support of local communities for the principles of establishing National Parks and therefore that local communities were effectively represented in the membership of the Park Authorities. There was much discussion on the most effective means by which these requirements could be met. In the end, the Rural Affairs Committee's conclusion was accepted and 20% of the membership is directly elected by local residents of the National Parks. The key factor which convinced the Rural Affairs Committee that direct elections should be supported was that it was the only means by which representation of local people could be guaranteed.

The survey finding that 64% of Scottish National Park residents called for more local representation has echoes with the Edwards Report statement that 'local people consider that their interests are not properly represented'. It is therefore argued that the focus of the Defra Consultation should not be on 'whether directly elected members would aid or hinder the decision making process and/or strategic functioning of the National and Broads Authorities', but whether local residents are properly represented in the decision-making structures of these Authorities.

Differences in the Objectives of English and Scottish National Parks

1. The objectives of the English National Parks Authorities

As section 2 of the Consultation (page 1) states the legal basis for the English National Park Authorities is contained in the Environment Act 1995 which identifies two statutory National Park purposes:

- a) To conserve and enhance the natural beauty, wildlife and cultural heritage of their areas; and
- (b) To promote opportunities for the public understanding and enjoyment of the special qualities of their areas.

If there is a conflict between the two, conservation takes precedence (the "Sandford" principle).

¹⁰ The three quotes above are from Scottish Parliament Official Report, 24 May 2000, Cols. 993, 995 & 996.

But the Consultation fails to mention that the Act equally states that '*in carrying out these two main responsibilities, the National Park Authority has a duty to seek to foster the social and economic well-being of local communities*'.¹¹ Authorities are expected to co-operate with other organisations to fulfil this requirement. The omission of this subsidiary clause to the purposes of National Parks is not only serious but creates an inaccurate context within which to assess the need for greater local representation.

In 2002, at the instigation of Defra, a Review of National Parks¹² was carried out. It reappraised this duty and the question of whether it should be made a third statutory purpose. It concluded:

*We take the view, as the Government did in circular 12/96, that "it is not appropriate for the National Park Authorities to assume the role of promoting economic and social development in the Parks, nor to compete with those agencies which have the power to do so". We are not persuaded that promoting the well being of local communities, or of sustainable development, should be made a new statutory purpose for National Park Authorities.*¹³

It went on to conclude that this socio-economic duty was only relevant where it was in support of the two statutory purposes. The Review recommended (recommendation 1)¹⁴ and Ministers agreed that *the Government should set out in a new public statement its vision for National Parks*. The Review advised that '*Promoting environmental, social and economic well being should, we believe, underpin the purposes of Parks, rather than be treated as additional to them. This should be reflected in the new Government statement (recommendation 1)*'.¹⁵

An Action Plan¹⁶ was devised to take forward the recommendations of the Review; a final report on the Action Plan in August 2005 includes the following action point:

4: Government should include in its new statement on National Parks (recommendation 1) policy advice on the role of National Park Authorities in promoting sustainable rural development and fostering the social and economic well being of local communities.

¹¹ Environment Act, 1995:

¹² Defra (2002) Review of English National Park Authorities. Defra Publications, London.

¹³ Ibid.: Page 14.

¹⁴ Ibid.: Page 13.

¹⁵ Ibid.: Page 14.

¹⁶ Defra (2005). Review of the English National Park Authorities: Final report on Action Plan. Defra, London.

However, no new public statement of the Government's vision for National Parks has ever been issued.

So, both the Environment Act, 1995 and the Review (and the absence of any new public statement from government) have failed to provide clarity about the meaning of this 'duty'. What is the difference between 'fostering' economic and social wellbeing and 'promoting' it? The Oxford Dictionary defines 'to foster' as 'to promote the growth or development of'!

2. The objectives of the Scottish National Parks Authorities

There is no such ambiguity in the Scottish National Park legislation. In September 1997 Donald Dewar, then Secretary of State and later first Minister of the Scottish Parliament, stated:

*I believe that national parks are the right way forward for Scotland. We are looking for a unique Scottish solution to meet a particular requirement. We are looking for a sustainable approach, where the requirements of economic and social development are balanced with those of conservation.*¹⁷

This principle was embodied in the National Parks (Scotland) Act, 2000, and was not contested throughout the debates on the Bill. The Scottish legislation sets out four objectives:

- To conserve and enhance the natural and cultural heritage of the area;
- To promote sustainable use of the resources of the area;
- To promote understanding and enjoyment of the special qualities of the area by the public;
- To promote sustainable economic and social development of the area's communities.

The commitment by the Scottish Parliament to a 'sustainable approach' in which the concerns for cultural, social and economic development are considered alongside conservation objectives has not been matched by Defra in considering the future of English NPAs. The subsidiary concern given to social and economic well-being in the legislation relating to English NPAs has a significant impact on the communities of the National Parks, and probably explains why the finding of the Edwards Review that '*local people consider that their interests are not properly represented*' is still relevant.

The Scottish Parliament recognised and valued the contribution which local interests and communities need to make if the National Parks are to be successful. It may be argued that the failure of Defra Ministers to issue a new

¹⁷ Quoted in Illsley, B. & Richardson, T. (2004) New National Parks for Scotland: Coalitions in Conflict over the Allocation of Planning Powers in the Cairngorms, in *Journal of Environmental Planning and Management*, 47 (2), (219-242).

vision clarifying the role of National Parks in fostering/promoting wellbeing is continuing to alienate local people from the NPAs.

3. Delivering sustainable rural development in English National Parks

The question remains as to how the National Parks in England should foster wellbeing – Defra states that this should be in cooperation with other organisations. Yet, if the National Parks are charged with taking an overview of the sustainable development of their areas, including of economic and social wellbeing, then should they not take a lead in ensuring that that wellbeing is fostered, e.g. by making proposals and recommendations to other organisations to secure economic and social wellbeing?

Many National Parks have issued Vision Statements as part of their Park Management Plans:

Peak Park Vision Statement includes:

A living, modern and innovative Peak District that contributes positively to vibrant communities for both residents and people in neighbouring urban areas, and demonstrates a high quality of life whilst conserving and enhancing the special qualities of the National Park.

Dartmoor National Park includes in its Vision Statement:

Crucial to all of this is the continuing relationship between the local communities and the National Park itself. Both the working economy and the National Park's cultural identity are vested in the local people. They provide the continuity, support and living heritage that make each place much more than a mere location on a map.

North York Moors Vision Statement includes:

A place where the diversity and distinctiveness of the landscape, villages and buildings is cherished.

A place where communities are more self-sustaining, and economic activity engenders environmental and recreational benefits.

The Lake District National Park reviewed its management objectives following the devastating impact of Foot and Mouth outbreak and they include:

The Lake District National Park will be an inspirational example of sustainable development in action.

It is clear that the National Parks in differing ways are beginning to express their objectives in terms of how to integrate socio-economic objectives with their primary landscape conservation agenda. Indeed in a Statement issued as part of the Review, two Defra Ministers endorsed the Review's conclusions and guiding principles, including the view that National Park Authorities should be:

*outward looking Authorities: acting as exemplars in tackling the challenges facing rural areas generally.*¹⁸

In this way, National Park Authorities need to become 'models of sustainable rural development', integrating concerns for the wellbeing of local communities with landscape conservation objectives. But rural development is increasingly being implemented through an approach which emphasises the involvement of local communities as a means of achieving the objective of rural sustainable development – an approach which recognises and appreciates the local distinctiveness of rural areas.

The Scottish National Parks are, unlike their English counterparts, non-Departmental public bodies, accountable to Scottish Ministers and Parliament. In the debates in the Scottish Parliament on the National Parks (Scotland) Act 2000, the major issue related to how the balance between the aims of conservation and the needs of local people could be achieved. It was the inclusion of the last purpose – relating to promoting economic and social development – that led to the requirement for the direct election of local representatives.

It is argued that there is some confusion about the role of NPAs in fostering/promoting social and economic well-being in English National Parks, not least among the residents and communities in the Parks. This could be most easily clarified by including 'fostering/promoting social and economic well-being' as a third objective within an overall aim of securing the sustainable development of the Park areas. By focusing on sustainable development the contribution of local communities to securing these objectives would become much more transparent. The Scottish experience suggests that to secure this contribution *local people have to be involved in its governance and management.*¹⁹

The status of National Park Authorities

The status of English National Park Authorities is unclear. The Consultation report states that they are independent with a membership structure similar

¹⁸ Defra (2002) Review of English National Park Authorities. Defra Publications, London (page 5).

¹⁹ Scottish Parliament, Rural Affairs Committee, Official Report, 29 February 2000, Col 440.

to joint local authority committees and planning boards. A recent study²⁰ by Nicola Thompson of Newcastle University suggests that they 'defy easy categorisation'. She states that they are 'free-standing local authorities, possessing some of the functions of conventional local authorities', but they also have 'many of the characteristics of non-departmental government bodies'.

It is unclear to which body the English NPAs are accountable. They are not accountable to Parliament – but they must account for their performance to Defra. They are not accountable to local authorities and certainly not to local residents. In contrast Scottish National Park Authorities are non-departmental government bodies accountable to Scottish Ministers and Parliament. This response argues that as the Prime Minister states in the Empowerment White Paper²¹ it is a priority 'to make our institutions more accountable'. There is a need to clarify the accountability of English NPAs. It is regrettable that the Consultation was not prepared in the context of this White Paper and that the Communities and Local Government Department was not involved in its preparation.

If NPAs are non-departmental government bodies then they need to be accountable to Parliament and subject to scrutiny through the Environment, Food and Rural Affairs Select Committee. If they are also local authorities because of the 'local authority-type' functions they perform then they must be accountable through their local authority members, but these are only indirectly elected and nominated by another body. But, the NPAs are not currently accountable to the residents of the National Park areas, as the Empowerment White Paper requires. The Parish Council nominees cannot be considered as the conduit through which NPAs account for their activities to the residents of the Parks. The Parish Councillors are not elected by the residents to serve on the NPAs but are nominated by their peers in an annual meeting of Park Parishes. There is no requirement for the nominated Councillors to report back to either the Parish meeting or to the residents. Moreover, in many parishes of the Parks which are especially sparsely populated parish elections are rarely held, and a great proportion of these parishes simply co-opt councillors.

If as the Empowerment White Paper argues local authorities are 'at the heart of local democracy' there is a need to extend democracy to National Park Authorities so that they can be held to account by their residents, just like any other local authority. This response therefore concludes that direct

²⁰ Thompson, N. (2008) National Parks and the governance of the rural environment, in Woods, M. (ed.) *New Labour's Countryside, Rural Policy in Britain since 1997*, Bristol, Policy Press.

²¹ CLG (2008) *Communities in control: real people, real power*. Cm 7427. London, The Stationery Office.

elections of local residents should be held to provide, as in Scotland, local representation, but recognises that national and local authority nominees should continue to provide the majority of the membership of the National Park Authorities.

The role of planning in National Parks

The one mainstream local authority services delivered by National Park Authorities is planning. However, the Consultation is also incomplete in providing information on the role of planning in National Parks and its implications for the governance arrangements. The changes to the planning service resulting from the Planning and Compulsory Purchase Act 2004 introduced the concept of spatial planning and as a result, an entirely different purpose for the planning system which is less pre-occupied with policing land-use change and more able to coordinate the different policies, programmes and projects that impact on places. As Planning Policy Statement 11 states:

'Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes which influence the nature of places and how they function.'

Spatial planning encompasses the ideals of collaborative, community centred approaches to build consensus about how places might look and function in the future. It seeks to contribute to the delivery of this future vision by coordinating the policies and programmes of a range of different agencies. Therefore, one of the key components of the new planning system is its emphasis on engaging communities and stakeholders in the planning process. The role of planning in National Parks is thus more than simply controlling the use of land within the context of achieving its conservation objectives, it now goes to the heart of how communities will function in the future.

Therefore, in considering the new governance arrangements in National Park Authorities there is a need to consider how best the community centred approach to the reformed planning system can be incorporated. This provides additional support for the need for improved local representation so that the views of the residents of the Parks may more effectively be brought to the planning debates in NPAs.

Responding to the consultation

The Consultation questions encourage little discussion of the potential benefits/disadvantages of direct elections. It seems that it is simply a referendum among a select group of consultees which does not include the residents of the National Parks. It gives the distinct impression that the

government is merely playing lip-service to the views of Parliament and is not seeking to have a wide ranging debate on the issue of direct elections.

There is a need as part of this consultation for government to fulfil its commitment to issue a new vision for National Parks, to reiterate its desire for NPAs to act as exemplars for tackling the challenges facing rural areas and to clarify the role of NPAs in implementing the new planning system.

Q1. Do you agree/disagree or support/object with/to the principle of Direct elections?

Given the important duty of NPAs in fostering economic and social wellbeing of its communities, the government's wish for NPAs to act as exemplars and the vital role which the planning system now plays in engaging communities in determining the future function of places, and in coordinating the policies and programmes of other agencies, direct elections are essential to ensure the effective input of views from communities and residents to the NPAs.

Q2. Do you agree with direct elections resulting in larger authorities?

This is a loaded question for which there is no discussion of the reasons why direct elections should result in larger NPAs, it could have equally asked about smaller authorities! Direct elections could simply be a means of replacing the Parish council nominees, and so result in the same size NPAs.

Q3. If authorities were to remain the same size which members should be replaced in favour of the directly elected members?

See above. This question should have been asked as part of the above.

Q4. N/A

Q5. Do you have any outstanding issues?

It is not possible to consider the issue of direct elections in the absence of any discussion of the role and function of the NPAs. The Scottish experience exemplifies the need to consider the issue of direct elections in the context of the status of NPAs, their role in fostering/promoting economic and social wellbeing, together with the planning responsibilities of the NPAs which have changed significantly since the Review carried out in 2002. There is a need for some debate on how NPAs can effectively integrate policies for the use and development of land in the Parks with the policies and programmes of other agencies. It is argued that the new planning system demands a higher level of collaborative action and community centred approaches than before,

and that this can be more effectively facilitated by Directly Elected NPA members.

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