



## **Consultation on the English National Parks and the Broads Draft Circular – revised version combining Circular 12/96 and Circular 125/77. Vision for National Parks: Government priorities**

**A response by the English National Park Authorities Association  
February 2010**

### **Summary**

1. The English National Park Authorities Association (ENPAA) exists to provide a collective voice for the nine English National Park Authorities. It is governed by the Chairs of the nine Authorities. Our response represents the collective view of the National Park Authorities (NPAs) and has been debated and approved by the Chairs of the NPAs. Individual National Park Authorities may submit separate comments, which will deal with specific issues for their particular area and draw on their local knowledge and expertise.
2. ENPAA welcomes the review of the Circular on the English National Parks and the Broads and the opportunity to contribute to the revision process. We appreciate the work put in by the Defra team and other Government Departments to reviewing such a wide ranging document and bringing it up to date. A not inconsiderable task as it was last published in 1996.
3. There is much in the Draft Circular which ENPAA supports, not least the inclusion of the Vision in section 3 and Annex 1. We very much welcome the inclusion of climate change adaptation and mitigation and increasing biodiversity as priority issues for all National Parks, the revision of the section on sustainable development and its prominent position in the Circular and the inclusion of a number of other new topics which reflect the current and planned work of NPAs and partners. The inclusion of section 4.1 explaining the Sandford Principle is welcome. Continuing explicit Government support for this principle is critical for the successful delivery of the purposes. We could elaborate on these points but this response concentrates on those areas where ENPAA feels more work is needed to make the revised Circular truly fit for purpose in the 21<sup>st</sup> century, more ambitious and useful to all who will need to use or refer to it.
4. In summary, our response is in four sections:
  - Presentation and communication – looking at the importance of communicating the Vision and Circular and the shelf-life of the Circular.
  - Responses to the questions set out in the consultation.
  - Comments on specific sections of the Circular
    - Planning

- Sustainable transport
  - Rural economies
  - Evidence bases and data
  - Biodiversity
  - Defence use of National Parks
- Issues that should be included in the Circular
- Community engagement
  - Social inclusion
  - Farming and food security
  - International context

### **Presentation and communication**

5. *Communicating the Circular:* Many have said that the Circular is too long and that a shorter strategic document would be preferable. We agree that the Circular is long but believe that it will inevitably be a long document if it is to contain the breadth of scope and level of detail required to make it a useful working document. National Parks and NPAs deliver a wide range of benefits and services to society and the Circular's length is in part a reflection of this.
6. Developing the detailed text of the Circular is the goal of this consultation process, but there should also be consideration of how to communicate the messages of the Circular beyond the formal document. This might be through preparing a summary which sets out the key purpose of the Circular, the main points and addresses itself to audiences outside the NPAs. This strategic document could usefully be supported by a senior inter-departmental group on National Parks to take the work of the Vision forward. The Vision could be published as a stand-alone text, as well as part of the Circular, if needed for specific audiences. Some concerns about the length may also be addressed by the design of the final Circular as a web document, with a good index page and links between sections. A searchable PDF will allow most people to find the sections relevant to them easily. As mentioned above while the Circular is long, not all users will read the whole document but will want to access one or two sections relevant to their interests.
7. *Shelf-life of the Circular:* While we note and welcome the intention to review the circular in five years, previous experience suggests it is likely to have a much longer shelf-life. The draft contains many references to 'transitory' policy documents (White Papers, etc), which will rapidly become out of date and/or be superseded by other documents. Given the Government's emphasis on the role of the National Parks in delivering long-term outcomes across a range of Government objectives (particularly in relation to climate change and biodiversity for example) it would be helpful to draft the document in a way that will avoid it dating quickly.

### **Responses to consultation questions**

#### *Question 1*

8. ENPAA feels that balance between the first and second purpose of National Parks is needed. As it stands the draft Circular gives an emphasis to the first purpose over the second. It is notable that the five priorities in paragraph 70 include nothing on the second purpose, and the second purpose is largely glossed over in the long list of 'priorities' that follow in section 7.

9. To achieve balance between the purposes a better reflection of the importance of promoting opportunities for enjoyment and understanding is needed. This could be achieved, in part, through new text on education and work with young people and health and wellbeing. This would also reflect the aspirations expressed in the Vision. Notwithstanding the issue of balance, the role of education should be better reflected within the Circular. A key change to achieve this would be to add after '**...expenditure.**' in paragraph 70, *National Park Authorities role in the provision and facilitation of education related to these key vision topics should not be underestimated and National Park Authorities and the Broads Authority are encouraged to do this and share best practice from their significant contributions to the above topics.*
10. Better balance between the statutory purposes should also be addressed through reordering of section 7 (see our response to Question 3 below) as well as through inserting additional text in other key places in the Circular.

#### Question 2

11. The draft Circular for public consultation reads as if it is written solely with NPAs in mind as an audience. In fact, although it is the key document laying out NPA roles and duties, it also sets out the roles and duties of other Government departments, statutory agencies, local authorities, land managers and many others with regard to National Parks and NPAs. The revised Circular must be relevant to all involved or the delivery of National Park purposes will be hampered. This can be addressed through some changes to the text and through a concerted effort by Defra in communicating effectively with other departments, statutory bodies, local government and others their role and interest in the Circular and National Parks. Text changes could include stating in paragraph 3 that the document sets out how other Government Departments, statutory bodies, local authorities and other partners will be expected to contribute to National Park purposes. The role of landowners and managers (private, voluntary or statutory sector) is underplayed throughout the draft Circular. Partnership working would be aided by inclusion of a full list of relevant partner bodies as an annex or on Defra's website, and inclusion of other key players such as Government Offices in the Regions and the Homes and Communities Agency in Section 9. Including reference to the role of Government Regional Offices in the Circular was a specific recommendation stemming from the 2002 Review of National Parks.
12. While we appreciate that input and sign off from other Government Departments is already part of the process of reviewing the Circular, more explicit evidence of their involvement with National Parks and commitment to them might be made. National Parks and NPAs deliver across a range of Government Departments including DCMS, DfT, DCFS, DECC, DoH, MoD and CLG. Recognition and understanding of this breadth of National Park benefits and NPAs work could be improved. Involvement of Ministers from other key departments in a press launch of the revised Circular could also be helpful.
13. As well as setting out the role of other organisations, ENPAA feels that the Circular should raise the bar on the contribution by others. The focus of the consultation draft Circular is on pushing NPAs to be exemplars in a range of areas and going beyond basic legal requirements. While NPAs are happy to embrace the role of exemplar and indeed set this as a goal for themselves, the Circular needs to similarly exhort others involved to step up to the challenge of helping NPAs and National Parks to be exemplars. NPAs can only deliver in partnership with others and then only if those others have 'bought in' to the objectives outlined in the Circular and Vision. This could be addressed in part by paragraph 51 advising agencies and organisations to be explicit in their own plans, strategies and reports about their contribution to National Park purposes. The text in paragraph 52 (duty on all public

bodies) is weak in comparison with that in paragraph 51 setting out what is expected of NPAs.

14. In addition, there is too much emphasis throughout the document on directing the activity of NPAs in certain policy areas where the emphasis should be on directing the activity of the bodies that have the real lead. Examples include, RDAs and District Councils with regard to rural economic development and regeneration or landowners and managers in National Parks with regard to sustainable farming practices, biodiversity protection and management, maintaining and improving access and a host of other issues. There is far too little reference to the importance of NPAs (and others) working in partnership with local communities and the farmers and landowners who actually own and manage the vast majority of the land in our National Parks. Similarly, the draft frequently over-states the role/powers of NPAs (as compared to other bodies). This is likely to create unrealistic expectations amongst stakeholders about NPAs responsibilities and abilities to deliver in a range of areas.

#### *Question 3*

15. Paragraph 70 is helpful in identifying five priority areas for NPAs since NPA resources are limited and prioritisation a necessity. However, section 7 then lists 19 other 'priorities'. It is simply unrealistic to suggest these are all priorities. The ordering of section 7 could be approached in several ways but at present it looks like an ad hoc list with no real prioritisation and no coherent reasoning for the order beyond the five priorities.
16. Also, as mentioned in our response to Question 1 above, the 5 priorities do not include any second purpose issues and the second purpose issues do not appear together in section 7 or directly after the priorities. As it stands the ordering of section 7 risks introducing an imbalance between the purposes by giving the first purpose a greater emphasis than intended.
17. Most of the items in section 7 would fit better within a section called 'Other key issues affecting National Parks'. Items relating to the two purposes should come before a host of other issues such as 'communications infrastructure' or 'mineral working in National Parks' – important though these are. The order of Section 7 needs to make sense to the reader and clearly reflect the National Park purposes and duty in a balanced way as set out in primary legislation. In order to achieve this and address the concerns set out above and in paragraphs 8-10 we suggest that the priorities for National Parks should be aligned with the Vision. This would give the Circular internal coherence and set a clearer path for delivering the Vision. Using the short version of the Vision on page 7 of the consultation document the priorities could be characterised as:
  - protection of landscape and cultural heritage.
  - promoting understanding, enjoyment, health and wellbeing.
  - leading on sustainable development and supporting thriving local economies.
  - addressing climate change through mitigation and adaption.
  - protecting and enhancing biodiversity.

#### *Question 4*

18. Although the draft Circular contains a summary of the Vision, there is rich material in the longer Vision which has only partially been captured in the text of the draft Circular. The Vision has more chance of being achieved if the full version of the Vision is embedded in the Circular as all involved will then know what they are working towards. This should be done for all sections, not just some. Significant gaps relating to health and wellbeing, education and enjoyment and ecosystems services exist. For each section of the Circular it should be

clear to the reader what the Government's objectives are. Embedding the longer version of the Vision fully will help achieve this. Annex A to our response includes a table showing which sections of the Vision are already embedded to some extent and which are absent or require further work.

## **Comments on specific sections of the Circular**

### *Planning*

19. We believe the planning system is a key instrument for the delivery of National Park purposes and the duty. NPAs have been given planning responsibilities in recognition of these statutory purposes that are of national importance. ENPAA believes it would be helpful if, in addition to listing the regulatory aspects of NPAs' work, the Circular could explain why NPAs are planning authorities, and how their status means they have other specific needs in addition to local planning authorities elsewhere in the country. Planning assists in delivering the spatial vision for the National Park, creating quality places through place shaping and supporting sustainable communities. Such roles extend beyond traditional development control and are embraced by NPAs. It would be helpful if this was recognised in the Circular in paragraph 60. We also look for paragraph 62 to include reference to NPAs' role in the 'preparation' (with others) of regional strategies as well as their revision, implementation and monitoring.
20. It is vital to explain the means by which the Government will test major development proposals in National Parks in the Circular. We are not satisfied that the major development test currently encapsulated only in PPS7 is adequately reflected in the Circular. Reference to the major development test in PPS7 is welcome but PPS7 is being reviewed and a weakened version of the major development test was proposed in the recent review of PPS4. A clear restatement of the origin and content of the major development test (also known as the Silkin test because it comes from the 1949 Act and is as relevant today as then, if not moreso) is therefore vital in the Circular. The test has been re-interpreted on a number of occasions (most recently in the preparation of National Policy Statements). The Circular should be where Government policy relating to National Parks is brought together in one place and clearly set out in order to preclude the need for renegotiation of the test in every new NPS or revision of PPSs.
21. The Circular does not deal with the setting of National Parks. This is not covered elsewhere in planning policy/ guidance in terms of how this should be addressed for all development types. It is only covered in PPS22 (renewable energy). It is quite legitimate therefore to have this set out in the Circular. Without it, ENPAA and NPAs will be forced to seek ten separate policies at regional level on this and seek to influence each PPS and NPS separately as they are reviewed or produced as well as negotiating separately with each adjoining local authority. This is a poor use of resources and could easily be avoided by clarifying policy within the Circular. This is entirely appropriate as the policy with regard to setting of National Parks applies only to them and will not be expressed elsewhere. To date, we understand only the South East Plan contains reference to the setting of National Parks (in Policy C1).
22. The landscape setting for a National Park is the area whose landscape character compliments that of the National Park itself, either through similarity or contrast, and in some way supports or enhances its landscape. A setting is not a simple buffer zone based upon a set distance from the boundary. It will be visible from the National Park and its depth depends on the Landscape Character of the area. Changes to the landscape quality of the setting will therefore have an effect upon the Landscape Character of the Park in question. The Circular should recognise landscape setting as a material consideration and support the application of the major development test for proposals within the setting of a National Park.

23. We are not convinced that paragraph 64 adds to what already exists in policy elsewhere regarding the requirements for SEA and the policy is not specific to National Parks or National Park Authorities. In addition, this paragraph contains reference to NPAs compiling a 'common evidence base'. As ENPAA has discussed with CLG, this wording is open to different interpretation and whether a collective evidence base is necessary or useful is questionable. All of paragraph 64 should be removed as it adds nothing to the Circular.
24. Whilst recognising that current legislation does not give equal status to National Park Management Plans (NPMPs) as Community Strategies, we would like the Circular to stress the importance of a National Park Community Strategy or Local Development Framework drawing heavily on the NPMP. In paragraphs 57-59 the Circular should clarify the relationship between NPMPs, LDFs and Community Strategies. It should advise that for some issues (access, environment, rural economy and regeneration in particular) NPMPs are, in effect, the Community Strategies for the National Parks. It should also make it clear that NPMPs and other, lower level, plans can be used as material considerations in land use planning matters. Also, it is unhelpful to start listing various *ad hoc* detailed requirements for inclusion in National Park Management Plans (see section 7.3 and paragraphs 34 and 81). Instead we would prefer advice to be updated in a more rational, comprehensive fashion through refreshed Natural England Guidance on National Park Management Plan preparation.

#### *Sustainable Transport*

25. Section 7.20 titled *Sustainable Transport* is too long and could be strengthened in its focus on *sustainable* transport. We would like it to be:
- shorter (in keeping with other sections);
  - aspirational regarding sustainable transport;
  - include details on the role to be played by other modes of travel (rail, bus, cycle, walking, water transport); and
  - make reference to the 'smarter choices' agenda and possible solutions to rural transport issues such as enabling rural car clubs or public transport services to key or underserved areas and the role played by NPAs in these initiatives.
26. We draw your attention to ENPAA's Transport Position Statement which sets out the following – 'England's NPAs aim to be at the forefront in supporting sustainable leisure transport networks that provide opportunities for everyone to experience the special qualities of our National Parks, whether they have a car or not. Our goal is to see a significant shift where a higher proportion of visitors and residents use alternatives to the car to travel around the National Parks. The numerous roads, railways, and other transport infrastructure within National Parks need to be managed carefully given the sensitive nature of these environments. ENPAA wants to see transport policies reinforce, not undermine, a sense of place. Major developments like roads should be avoided, and overhead, our skies should remain tranquil'. This would be a valid aspiration for the Circular to express with regard to transport.
27. Paragraph 116 should be made more specific in its reference to more sustainable forms of transport. Paragraph 118 should be redrafted to put the emphasis on irresponsible driving and inappropriate (rather than just excessive) speeding, rather than the nature of rural roads. It is driver behaviour that is the problem in the vast majority of cases, not the roads. In many National Parks the nature of the roads forms an important part of the landscape, and indeed the visitor experience. In most cases the nature of the roads is dictated by the geography of the area, so important to National Park designation. Therefore, it is not necessarily the nature of the road which is the issue but the appropriateness of the speeds at which the

roads are travelled. Where it is necessary to undertake remedial measures to improve road safety, it is important that not only does the improvement “*not increase unnecessarily the capacity or speed of the road*”, but that it does not increase the “*perceived speed*” of the road. This is particularly important where remedial measures are undertaken to improve safety for motorcyclists. In some cases measures to improve road safety through engineering measures have produced roads resembling race tracks, which are driven accordingly.

28. Where it is necessary to undertake traffic management and signage measures etc, this should be accompanied by the removal of redundant signs and infrastructure. DfT are currently undertaking a review of Road Signs and reducing the clutter caused by signage is an important objective of the review. Reference to removing redundant signs and infrastructure would, therefore, complement the review. It is also important that not only should measures be “*supplemented in a way that can formally be monitored*”; they should also be subject to review.
29. Paragraph 118 should support area wide approaches to speed management that are in keeping with protecting National Park landscapes. A number of National Parks (such as Dartmoor and the New Forest) have 40mph limits. These are important for reducing those killed or seriously injured in collisions, reducing the number of livestock or roaming animals (that can in themselves be a special quality of the area) that are killed on the roads, and ensuring those using roads in National Parks are not intimidated by speeding traffic. To date, the introduction of speed management zones requires a lot of additional signage, or special authorisation from the Secretary of State for Transport. We believe the Circular should make it easier for transport authorities working in conjunction with NPAs to introduce innovative speed management schemes that are in keeping with the requirements of a protected landscape.
30. Paragraphs 119-121 refer to road improvements but the reasons for improvements do not reflect current Government priorities for transport such as managing traffic demand, encouraging other modes of travel, reducing collisions or reducing climate changing gas emissions. A change in wording is needed to move away from road improvements towards demand management and avoidance of negative environmental impacts of road transport.
31. We believe paragraph 119 needs to be clarified where it refers to the ‘recreational aspects of the Park’. In keeping with supporting sustainable tourism and managing the effects of visitor pressure, the emphasis needs to be on recreation that is appropriate to the capacity of the environment, not just the capacity of the roads.
32. Paragraph 120 should emphasise reducing the need to travel and achieving a shift to sustainable modes for both resident and visitor travel. The sentence referring to restraint being exercised in “*considering improvements to accommodate visitor traffic*” should also refer to cross-Park traffic.
33. Paragraph 122 should make it clear that Natural England is consulted early on, and not only in cases where an Environmental Statement is required.
34. We welcome reference to aircraft movements in the draft Circular but believe paragraph 124 could probably be replaced by a shorter paragraph focused on the latest advice to CAA on over-flying protected areas. ENPAA would like to see a commitment in the Circular that the CAA will consult NPAs on all proposals for air space change over a National Park, and to report on the implications for National Parks of the forecast growth in air traffic.

35. Nothing is mentioned in section 7.20 of the transport connections to and within National Parks by public transport. While not all National Parks have good public transport connections, some have excellent rail and bus connectivity and services which are underused by visitors and residents. NPAs are working with others to publicise transport connections and encourage greater use of rail and bus. With the designation of the South Downs National Park this issue will gain more prominence and should be addressed in the Circular.
36. There is no reference within the draft Circular to the building or reinstatement of railways in National Parks or the building of new rail routes. This should be covered and be dealt with in the same way as the demand for other major schemes, such as major roads through National Parks.

#### *Rural economies*

37. For many years NPAs have worked to promote thriving rural communities and plan to continue to do so. Indeed, for NPAs it is not just a matter of meeting their statutory duty but a key feature of the Vision for English National Parks. Paragraph 100 does not reflect the work already done by NPAs and should be amended to reflect this. We suggest adding: "must actively... drawing on the good work already undertaken and shared aspiration to support thriving rural communities". Reference could be made to the sort of activities that NPAs could (and do) undertake to support the economy such as: promoting sustainable tourism; supporting agri-environment schemes; use of the Sustainable Development Fund; rural regeneration and development management initiatives; and facilitating the installation of renewable energy projects.
38. While we support the intention behind much of section 7.15, the drafting is quite loose and goes beyond what is actually set out in statute (and which is more accurately expressed in the last sentence of paragraph 54). It would be helpful to be much more explicit about the NPAs having a supporting role to the real lead players (RDAs and District Councils). As we detailed in our response to Question 2 the draft Circular is unbalanced in regard to setting out aspirations for NPAs as compared to other bodies with roles within National Parks. It would also be helpful to see some reciprocal onus being placed on those bodies to consider carefully how they can 'go the extra mile' to support types of economic development that are:
- a) on a scale appropriate to remote rural areas; and
  - b) of a type that helps to 'conserve and enhance the special qualities and the public's ability to enjoy and better understand them'.
39. The Circular should distinguish clearly between NPAs' role in supporting the local economy as:
- a) the planning authority; and
  - b) part of delivering statutory purposes.

#### *Evidence bases and data*

40. Clarity is required about the relationship between key evidence bases, particularly the State of the Park Report (SoPR) and the Annual Monitoring Report (AMR). Paragraph 57 should say that State of the Park Reports 'will be' rather than 'may be' produced. Both the State of the Park and Annual Monitoring Reports should comprise a robust evidence base, including trend data, required to support the adopted policy approach.
41. Each National Park Authority will need the resources to collect its own data and be able to access data collected by others to develop a robust evidence base. So we welcome the setting out in paragraph 135 of the duty on partners to collect and provide data for National

Parks. However, this paragraph would be improved by requiring partners to collect data in such a way that it is possible to readily provide information that fits National Parks boundaries - a National Park cut of the data. For many existing data sets a National Park cut is not planned for or cannot be provided easily but this is a problem that could be resolved. Support within the Circular for providing a National Park cut of data will aid progress on solving this perennial problem for NPAs, Defra and others. Paragraph 135 should also highlight the important role played by the ONS in providing data that is compatible with National Park boundaries and encourage them to provide a National Park cut of all relevant data.

42. While supporting the need to have robust evidence bases for the National Park Management Plan, SoPR and AMR, we are concerned about that the suggestion in paragraph 64 that National Park Authorities compile a common evidence base for their plans and SEA/SA work. Clarity is needed on this point, otherwise it could commit NPAs to a mammoth task, including duplication of evidence/data gathering that is already done by others for which NPAs have no resources. Each NPA currently compiles the baseline evidence needed for SEA work for its own National Park. Some of this will be the same data and information used within the AMR and SoPR, and each baseline is unique to the National Park concerned. We do not see what value there would be in compiling a common evidence base across the Parks for SEA and LDF preparation, which is specific to the spatial area concerned. As far as ENPAA is aware there are no cross National Park plans or programmes requiring SEA and so no need for a common evidence base. We question the point of such an exercise, especially when doing so would require additional resources which are not currently available. We request the removal of the requirement for a common evidence base in paragraph 64. We understand CLG would be content with such a change.

#### *Biodiversity*

43. ENPAA welcomes the commitment to increasing biodiversity in English National Parks expressed in sections 6.5 and 7.3 of the consultation document. NPAs already have plans developed to highlight their work on biodiversity in their National Parks throughout 2010, the International Year of Biodiversity, to make sure that the special qualities relating to biodiversity continue to be protected, enhanced and appreciated in 2010 and beyond. Existing and future work on biodiversity will be boosted by the added focus on biodiversity in 2010 and we welcome the additional support given by the changes to the Circular which make it clear to all that the focus on biodiversity is not just a one-year project. Having said that, we refer to our comments above (paragraphs 8-10) on the need for balance between the two statutory purposes of National Parks. Increasing biodiversity is only part of the wider work of NPAs.

#### *Defence use of National Parks*

44. Defence use of National Park land has a long history and has been the source of concern and disagreements in the past. The proposed wording in the consultation document seeks to address areas of concern but is not acceptable to us.
45. ENPAA and the relevant National Park Authorities at an individual level are committed to maintaining a positive working relationship with the MoD in order to secure the best outcomes from the continued use of National Park land for defence purposes. Having worked with MoD staff in seeking a mutually agreeable form of words on this issue, ENPAA suggest the text contained in Annex B to replace paragraphs 132 and 133 in the consultation draft Circular. We understand this is acceptable to MoD/ DE officials. Whilst the wording does not contain all that we would ideally like, it represents a workable compromise.

### **Issues that should be included in the Circular**

46. As explained in our response to Question 4, we believe that embedding the longer version of the Vision into the main text of the Circular will enhance the document, making it more ambitious. Below we focus on three issues which are covered in the Vision but not yet included in the main text of the Circular. All reflect existing areas of work for NPAs, National Park communities and partner organisations but all are also vital to the future of National Parks.

#### *Community Engagement*

47. The issue of how resident and visitor communities engage with National Parks and National Park Authorities has been the subject of much debate in recent years and a consultation in 2008 (*Direct Elections to English National Park and Broads Authorities*, Defra). It is therefore surprising that no substantive comment is made in the draft Circular on community engagement. Not only does this omission overlook the substantial work already undertaken with communities by NPAs and partners but it neglects an important area of work for the future success of National Parks.

48. The range of measures NPAs use to engage with communities was detailed in our response to the 2008 consultation on direct elections and we will not repeat the list here. In his statement responding to the consultation the Minister, Huw Irranca-Davies said:

*'I have been impressed with the range of community engagement that already occurs, and having carefully considered the responses I have decided not to make any changes to the current membership arrangements. I am proposing ways of improving the accountability of the National Park Authorities and to more consistently apply some of the examples of best practice across all Parks.'*

49. Since the consultation, NPAs are introducing further measures to improve community engagement and share best practice. We see involvement of residents and the wider public as a key strand of future work. This is why community engagement is one of the six themes of the Vision for the future of National Parks.

50. To address this omission we believe:

- Section 2 of the Circular should state that National Park Authorities are required to apply the 'Duty to Involve' measures contained in the Local Government and Public Involvement in Health Act 2007 and explain how they do this; and
- a section on community engagement should be added in section 7, 8 or 9 detailing some of the best practice work to date on community engagement and embedding the commitment to further engagement from the Vision into the main text (see Annex A). This would reflect both our own and Government's aspirations.

#### *Social inclusion*

51. While it says little on community engagement, the draft Circular says nothing on social inclusion. This is a surprising omission given the wide range of activities past, present and planned that aim to reach out to under-represented groups, introduce them to National Parks, improve access to National Parks and increase the understanding and enjoyment of National Parks by all sections of society. Such activities are fundamental to delivery of the second purpose.

52. Some aspects of work on social inclusion could be included within sections 7.9, 7.10 and 7.11, on access and rights of way, but no mention is made in the draft Circular of outreach programmes to increase direct access most notably Mosaic and the 'Education outside the

Classroom' initiative. In terms of long term goals, inclusion of the text from the 'health, well-being and enjoyment' section of the longer Vision would do this job well.

53. Also all NPAs are working to increase the diversity of employees, members and volunteers in order to better reflect their local communities, communities of interest and wider society. Section 2.1 of the Circular should reflect this work by referring to the requirement for NPAs to comply with equalities legislation and guidance affecting local authorities. NPAs are, amongst other activities, producing Equalities Impact Assessments, action and improvement plans, conducting staff and member training and looking at how they will implement the requirements of the Equalities Bill when it has been enacted.

54. In discussing enjoyment and understanding of National Parks, it is worth noting the recent report *Promoting Participation with the Historic Environment* by the Public Accounts Committee which pointed out that:

*As well as by visiting historic sites, there are many more opportunities to enjoy our heritage such as by getting involved in local conservation projects, by learning on the internet, and by watching historically-based television programmes....*

*Furthermore, the historic environment can be experienced and enjoyed by walking down the street, visiting a local church, watching television or using the internet. Building stronger public support will depend on taking an inclusive approach to what constitutes our heritage and in particular on developing an interest in heritage in children of all backgrounds.*

55. This broader understanding of participation is equally applicable to the understanding and enjoyment of National Parks or discussions on inclusion. The Circular would do well to register the plethora of opportunities for engagement with National Parks and National Park Authorities that exist via radio, film, television, the internet and the creative use of new media and telecommunications. The Virtual Classroom developed by UK ANPA will enable NPA staff using videoconferencing to talk to school children in areas far away from a National Park. Similarly work by NPAs now enables people to take virtual tours of historic sites or scenic areas, watch animals on-line and learn about biodiversity. Access via these methods can be more inclusive and enable far more people to benefit than direct access if handled well.

56. Over 1.5 million people visited NPA websites in the second half of 2009 so this is a significant form of access to National Park information. We also know that a proportion of website visitors combine their use of the website with actual visits to National Parks. Potential visitors use the website to download information on walks, historic sites, biodiversity, guided walk information, podcasts, geocaching data and other information. NPAs are working within their limited resources to make best use of these new opportunities to inform and inspire people as well as continuing with the more traditional provision of information via visitor centres, access to rights of way and open access land and ranger services.

#### *Farming and food security*

57. As stated in the Vision, livestock farming continues to have a central role in our National Parks and ENPAA sees that role continuing in the future. While section 7.7 covers the role of agri-environment schemes in delivering National Park purposes, we feel that as an important factor in the rural economies of National Parks, farming deserves a fuller treatment in the Circular. It should be at least on a par with sustainable tourism – another key facet of rural economies.

58. As stated in paragraph 11 (above), the role of landowners and managers is underrepresented throughout the draft Circular and inclusion of farming as a key issue would help address this oversight.

59. We provide some text on farming below that could be used in the Circular. Other partners might wish to expand on this, particularly with regard to the contribution of sustainable farming practices to food security, climate mitigation and adaptation, biodiversity protection and enhancement, and a myriad of other benefits.

*The landscapes of our National Parks have been shaped by generations of farming activity. Our National Parks are important in supporting the food chain and have a key role to play in producing high quality food that is good for people and for the natural environment. For example, the upland National Parks are an important source of high quality calves and lambs for breeding and finishing.*

*Farming in the National Parks should be focused on sustainable farming practices that respect environmental limits and deliver an array of public benefits that include: high quality food, storage of water, protection of historic features, keeping the landscape open and accessible and management of soils.*

*International context*

60. ENPAA also supports calls for the Circular to acknowledge the international context of protected areas, of which National Parks in England form an important part.

ENPAA February 2010

**Annex A – Table showing the extent to which the Vision has been embedded in the draft Circular**

Vision	Section of NP Circular
<b>Community Engagement</b>	
National Parks will be one of the prime ways in which everyone can discover England's natural and historic environments and be inspired by them.	7.5
The Parks will be held up by everyone as one of the best features of England, a source of pride.	Unclear
Resident communities will be keenly aware of the special value of their own locality. They will take an active role in decision making which will help deliver this vision for National Parks.	Not covered in Circular
Our visitor communities will be able to learn about what makes the Parks special, and make that personal connection to these great places.	Unclear
<b>Health, well-being and enjoyment</b>	
All young people living in England will have the opportunity to enjoy an experience of a National Park at first hand. This will help with their emotional development, their confidence in facing challenges, and their ability to assess and take risks.	Not covered in Circular
The Parks will play a role in changing people's behaviour, helping them adopt healthier lifestyles, find inspiration and engage with the spiritual side to their existence.	Not covered in Circular
National Parks will be the country's biggest venue for bringing together people from varied communities to experience the wonder of landscapes, wildlife and heritage, to share a range of different activities, and to form new relationships and networks.	Not covered in Circular
<b>Climate Change</b>	
The wildlife and natural systems within the Parks will be managed in ways that creates resilience and allows adaptation. The Parks will also play a critical role in helping species to migrate in response to changing conditions.	7.1
The Parks' special qualities may change as we adapt to a new climate and new ways of life, and where this is inevitable, Parks will be demonstrating successful adaptation strategies to seek to manage the transition for the landscape, for the economy, and for the individual.	7.1
The National Parks will be energy neutral. This will have been achieved through cutting energy use (as a result of changing life-styles and greater energy efficiency) and low impact renewable energy supplies, generated close to where it is used. Businesses in National Parks will be implementing appropriate climate change mitigation strategies, which will be seen elsewhere as models of good practice.	7.2
The National Parks will be carefully managed to act as major carbon stores, and this role will be widely recognised.	7.2
National Parks will be delivering a key role in water resource management that sees them supporting water catchments to conserve water supply, provide for improved water quality, and reduce flood risk.	7.2

<b>Natural environment and cultural heritage</b>	
National Parks will be characterised by their rich, distinctive and highly valued landscapes and cultural heritage. Their landscapes and historic environment will be conserved and enhanced to protect their cultural identity and aesthetic value, and to inspire creativity.	<b>7.5</b>
There will be much greater diversity and abundance of wildlife living within the Parks.	<b>7.3</b>
National Parks will continue to be large tracts of countryside and coast that are managed to provide tangible services to the nation including the protection of water resources and improved air quality.	<b>Not covered in Circular</b>
<b>Sustainable Development</b>	
'Sustainable Development' will be a visible reality within the National Parks. Other parts of England – especially rural areas – will see National Parks as models for the way they too might develop.	<b>2.2</b>
Careful management will have enabled the incorporation of new developments that are progressive in architectural design, take their inspiration from the Park landscape, whilst respecting distinctive character.	<b>Unclear</b>
There will be a much better awareness of the links and interdependencies between urban and rural areas, and of the services and products provided by one to the other. Residents and visitors alike will be able to learn how their own consumption of natural resources can affect these special areas.	<b>Not covered in Circular</b>
National Parks will be exemplars in demonstrating sustainable, low carbon, transport and travel in rural areas. This will have been achieved by reducing the need to travel and through provision of quality public transport and cycle infrastructure.	<b>7.20 but needs more work</b>
Decision making will be underpinned by sound and clear evidence. Environmental limits to development will be well understood and respected by decision makers and others, and will lead the way the Parks are looked after.	<b>2.2</b>
<b>Community and Economy</b>	
Thriving rural communities living within the National Parks will better reflect the diversity of English society as a whole with opportunities for young people, families and those of all ethnic backgrounds to benefit from and contribute to life in National Parks.	<b>Not covered in Circular</b>
There will be a diverse mix of profitable small and medium scale organisations doing business within the National parks, alongside a thriving tourism and land-based economy. Economic activity, in harmony with the Parks' special qualities, will be welcomed and encouraged.	<b>7.15</b>
Rural communities and businesses in National Parks will have good access to technology and other services so their specific needs are met.	<b>7.15</b>
Livestock farming continues to play a central role in conserving and enhancing the highly valued landscapes, wildlife, cultural heritage, natural resources, carbon sinks, opportunities for access and enjoyment, and other public benefits provided by England's National Parks.	<b>7.7 but more needed</b>

## **Annex B – suggested text on Defence use of National Parks**

To replace paragraphs 132 and 133 of the consultation draft:

*Parts of some of the National Parks have a long tradition of defence use which predates the designation of the Parks. Whilst access restrictions, noise and visual intrusion of military infrastructure may detract from the Parks purposes, defence use of the Parks makes a major contribution to the country's defence capability. It provides essential facilities which could not be readily provided elsewhere. For these reasons, the Parks will continue to be an essential training resource for the foreseeable future. Moreover, such use often makes an important contribution to the economic and social well-being of local communities in and around the Parks.*

*The Ministry of Defence recognises the importance of National Parks. In keeping with the principles of the Defence Estate Strategy, the MOD will ensure that defence use of land within National Parks is kept under review. It will continue to give a high priority to conservation, public access and wider issues of sustainability. The MOD will continue to work with the relevant National Park Authority to minimise the impact of defence use consistent with the operational defence requirement. It will seek to maximise the benefits that can accrue through active environmental management and to contribute to the socio-economic well-being of local communities.*

*Following regulations made in 2006, the Ministry of Defence became subject to the general planning regime, including statutory plans, planning policies, development control and the regulations on Environmental Impact Assessment. In addition, any new, renewed or intensified use of land in the Parks for defence purposes that falls outside of the statutory planning system will be subject to formal consultation with the relevant National Park Authority and Natural England. Such proposals should, as far as possible, take account of, and seek opportunities to conserve and enhance the natural beauty, wildlife and cultural heritage of the Park, enable better public access and seek opportunities to provide benefits to the local community. Where proposals are not subject to the statutory planning regime the Ministry of Defence will undertake a non-statutory sustainability appraisal and further assessments as necessary. It will consult with and agree the scope of these sustainability appraisals with the relevant National Park Authority and Natural England.*

*Any conflict between defence use and Park purposes is best resolved through timely co-operation between the Ministry of Defence and the National Park Authorities. In order to enable this, a proportionate means of conflict resolution should be established by the Ministry of Defence and individual National Park Authorities.*