

## Department for Environment, Food and Rural Affairs

### Summary of responses to the Consultation on Direct Elections to English National Park Authorities (28 July to 28 November 2008).

March 2009

#### 1. Introduction:

Parliamentary consideration of the Natural Environment and Rural Communities Act 2006 and the Broads Bill 2007 has resulted in an ongoing issue about direct elections to the National Park and Broads Authorities. As a result, the Government is undertaking an open consultation to seek views from its stakeholders to explore whether directly elected members would aid or hinder the decision-making process and/or strategic functioning of National Park and Broads Authorities. It wishes to give its stakeholders the opportunity to evaluate the relevant issues. The accompanying consultation document simply set out the issues for information purposes only without any views or recommendations. It took into account the fact that, as the Broads Authority and the National Park Authorities were established under two different Acts of Parliament, they have different membership arrangements. Consultation responses and summaries of these responses for each Authority are set out below. A total of 496 responses were received from the following individuals and organisations.

#### 2. Summary of Responses:

##### Broads Authority

Respondent:	Comments:
Richard Bacon MP (South Norfolk)	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>The principle of direct elections for National Park Authorities is a sensible one. Where an authority has planning powers, as the Broads Authorities does, it is in my view inappropriate that there should be no directly elected input. The role of a member in a National Park Authority is to ensure that the Authority fulfils the National Park purposes to the full and does so in the way that best suits the special characteristics of navigation. I would disagree strongly with any proposals for direct elections that would, inadvertently or not, dilute the Broads Authority's commitment to navigation.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>My primary concern would be to ensure that the Broads Authority remained effective following the introduction of any elected component to its membership. The Broads Authority currently has 21 members, one fewer than other NPAs except the Peak District. It is not clear why this should be the case, but I would suggest that membership of the Broads Authority should be no greater than that of other NPAs of comparable size, irrespective of the Broads Authority's exact composition. One way round this would be to reduce the number of members appointed by the Secretary of State covering interests other than navigation.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>One of my primary concerns over the Broads Authority Bill was its attempt to downgrade the Broads Authority's commitment to navigation, possibly in order to obtain full national park status. I feel it is very important that the interests of navigation continue to be represented, and that members of the navigation committee continue to sit as members of the Broads Authority. It would make most sense to replace members who are local authority appointees, as the election of local representatives makes such appointments unnecessary.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>The right approach here will depend on the outcome of the ongoing process to reorganise local government in Norfolk and Suffolk. Should the Boundary Committee's draft proposals go ahead, the eight local authorities in Norfolk and Suffolk who have appointed members to the Broads Authority would be replaced by, at most, three unitary authorities. Should this happen, there would certainly be scope for some of the nine places for locally appointed or elected members to go to representatives of local parishes.</p> <p><i>Do you have any outstanding issues?</i></p> <p>DEFRA must make it clear to the leadership of the Broads Authority, as well as any potential candidates for election to the Authority, that because of the Authority's need to maintain a strong commitment to navigation, it cannot be a fully-fledged National Park.</p>
Norman Lamb MP (North Norfolk)	<p>Can I refer you to the comments made by very many individuals in support of the case for democratic representation. It seems to me that there is a very powerful case for introducing democratic representation. I know Gordon Brown when he was first elected Prime Minister, talked of the importance of public engagement and extending the democratic principle. This would be a perfect occasion to demonstrate this commitment and I believe that the Government would be applauded for it.</p>
Broads Authority	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>Though the feedback from the Scottish national park authorities is that direct elections have worked there, their situation is very different, as they have large whole settlements included within their boundaries. The boundary of the Broads is unique in the way that it covers several meandering river valleys encompassing very few whole settlements. It should be noted that if directly elected members were introduced onto the Authority, the Authority would need to determine who could vote and how this would be done. The electorate is very small within the executive area and would not be fully representative of the Authority's three fundamental responsibilities. Indeed, there is a concern that the introduction of directly elected members could also promote a biased approach towards issues, should they pursue a more narrow interest, rather than the holistic interests of the Authority and the wider community it serves. To conclude the Authority is not opposed to the principle, but it considers that direct elections would not make a positive contribution.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p>

	<p>The existing membership size of the Authority is working very well and conforms to being as small as possible consistent with effectiveness and the equitable distribution of local representation. The Authority would therefore not support an increase in its size to support directly elected members.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>There is concern that the introduction of direct elections, at the expense of existing representation from local authorities and a less joined-up approach to the common issues we are presented with. As already stated, the introduction of directly elected members could also promote a biased approach towards issues should the member pursue a narrow interest rather than the holistic interest of the Authority and the communities it serves. It is also highly unlikely that directly elected members could replicate the level of planning expertise currently contributed by the present local authority members. Therefore, the Authority does not support local authorities being replaced by directly elected members. For similar reasons, the reduction of experience provided by Secretary of State appointees, through their replacement by directly elected members would not be conducive to the effective management of the Authority's responsibilities and is therefore not supported by the Authority. The third responsibility of the Authority, namely navigation, means that the Broads Authority appoints two Navigation Committee members to serve as full members of the Authority. The result of this is that the special interest of users of the navigation, both private and commercial, are appropriately represented on the Authority. Any reduction of the representation from the navigation interests would deplete the ability of the Authority to fulfil its duty in that respect, as well as possibility having repercussions upon the economic well-being on the Broads due to the strong tourism link. Therefore, the Authority does not support members provided by the Navigation Committee being replaced by directly elected members.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>The Authority is more receptive to the notion of parish members on the Broads Authority, when compared to directly elected members. Certainly accountability could be strengthened, but the Authority does not consider that their contribution, could outweigh that provided by the current local authority members. Therefore, through the Authority is receptive to this notion, it does not support the introduction of parish members on to the Authority at the expense of reducing current local authority, secretary of state, or Navigation Committee appointees.</p> <p><i>Do you have any outstanding issues?</i></p>
Norfolk County Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>Yes – vague response.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>No.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>Secretary of State appointed members.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>Yes</p> <p><i>Do you have any outstanding issues?</i></p> <p>No.</p>
Broadland District Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>Broadland District Council broadly supports the general principle that there should be a proportion of directly elected members and/or appointed representatives of Parish Councils on the Broads Authority. That said, implementation would require careful consideration. In particular, it should not result in the dilution of the present ratio of local authority members, Navigation Committee appointments and those appointed to represent the national interest.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>Any change to the constitution of the Authority as presently existing should only be made after detailed consideration of all the factors involved and full consultation with stakeholders, toll-payers, local authorities and the Broads Authority. In view of this, it is considered premature to express an opinion either way.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>Concerned that the present balance of representation covering the three fundamental responsibilities of the Broads Authority as laid down in the Norfolk and Suffolk Broads Act 1988 should not be impaired. When the Broads Authority Bill is enacted the Secretary of State will need to have regard to maintaining an overall balance between navigation, conservation, agriculture and landowning and land based recreation. The present system of locally appointed members, including local authority members and those appointed on merit and expertise through an open process, has worked well and ought not lightly to be discarded. The question of the present representation by Local Authority members is subject to the current Local Government Reorganisation now in train. With regard to the replacement of 2 members appointed by the Navigation Committee, the Council is strongly opposed to this. Any dilution of the representation from the Navigation interests would seriously deplete the ability of the Authority to fulfil its duties in that respect, as well as have repercussions upon the economic well-being of the Broads. There is a further factor, namely that there would be significant opposition from the several thousand toll-payers.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>Defers comment on this issue pending clarification on the issues referred to above.</p> <p><i>Do you have any outstanding issues?</i></p> <p>It is unlikely that directly elected or Parish Council members could replicate the level of planning expertise currently contributed by the present local authority members. The Council is likely to be more impressed by the ability, expertise, and local knowledge of any directly elected or parish members than by their demographic breakdown which appears to be largely irrelevant. It strongly urges the Minister not to incorporate any changes arising from this consultation into the Bill currently before Parliament, for the following reasons: (a) the Bill is predominately concerned with the vital issue of boat safety and its implementation and the application of these important provisions therein is eagerly awaited. The whole question of direct elections and local representation is better considered after the outcome of the Local Government Review is completed, at which time the complexities of ascertaining the electorate, etc, may be considered.</p>
Great Yarmouth Borough Council	<p>The Borough Council's view is that the status quo should remain with regard to representation on the Broads Authority, in that membership of the Broads Authority should be from nominated elected members from County, District and Borough Councils.</p>
South Norfolk	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p>

Council	<p>Agree. <i>Do you agree with direct elections resulting in larger authorities?</i> Agree. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> None. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> No. <i>Do you have any outstanding issues?</i> Comment on governance, independence, and accountability to electorate. SNC believes that democratically elected members should be the norm rather than these appointed by the Secretary of State.</p>
Norfolk Association of Local Councils	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> The Norfolk Association of Local Councils has always supported the democracy of elections. We encourage all councils to promote themselves in order to encourage more elections and first tier level. We therefore, in principle, in favour of direct elections. It is appreciated that the logistics do not allow for direct elections for National representatives. The Association would not wish to see directly elected members in place of Parish Council members. <i>Do you agree with direct elections resulting in larger authorities?</i> Most organisations have an optimum number of representatives to ensure both that it is representative and also that the group can be workable. It would be presumed that an authority of 22 members having been sufficient in number, if not representation, prior to this consultation should still be the optimum level. It would be interesting to see how a greater number, as in the Peak District, improved or hampered the work of the Authority. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> The timing of this consultation crosses over with the current review of Local Government in Norfolk and Suffolk. Depending on the outcome of that review the number of principle local authorities in the Broads area may change (as is currently the case with Northumberland). Should a Norfolk Unitary Council be formed then the number of councils from one authority could be 7 or 8. This would obviously be an area that would need investigating. However, as things stand at the moment then the Norfolk Association of Local Councils would like to see a reduction in the number of National members in favour of directly elected members. The Association would not wish to see directly elected members taking the place of Parish Council members both on the existing Authorities and eventually on the Broads Authority. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> Norfolk Association of Local Councils has worked for several years to try and get parish representation on the Broads Authority. We feel it is imperative that the Parish sector is represented. As stated in the answer to question 3 representation could be accommodated via reducing the number of unitary councillors (if appropriate) or by the reduction in National members. <i>Do you have any outstanding issues?</i> Whatever the outcome of this consultation with regard to direct elections the Norfolk Association of Local Council still wishes to see representation on the Broads Authority for Parish Councils.</p>
Horning Parish Council	<p>We would like to see all members of the authority democratically elected. We have increasingly frustrating dealings with the authority. Letters and phone calls go unanswered and the planning department make decisions which we feel have no real say in, unlike North Norfolk District Council who communicate regularly and openly with us. We feel a democratically elected membership would give control and balance to an authority who currently do not consider the views of anybody other than themselves.</p>
Somerton Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Positively agrees with and supports the principle of Direct Elections – our primary reason for this response is that direct elections are more democratically accountable. We believe that directly elected Members would have a positive interest in, and commitment to the Broads Authority, and that such Members would enhance the effectiveness of all NPAs. Regarding the costs and practical issues of running direct elections, we believe that the inevitable additional costs would significantly benefit the Areas served and that local expertise would be a distinct advantage. <i>Do you agree with direct elections resulting in larger authorities?</i> Believes that democratic accountability should be the paramount consideration, even it results in larger Authorities. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Does not believe this to be an option. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> The Broads Authority should definitely have Parish Members. Not to replace existing members, but that Parish Members should be an integral part of a democratically elected Broads Authority. <i>Do you have any outstanding issues?</i> Believes very strongly that those who are democratically elected have a legitimacy which no appointee can ever have. We further believe that it is necessary for members to be local and free from pecuniary interests.</p>
Wroxham Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> No – vague response. <i>Do you agree with direct elections resulting in larger authorities?</i> No. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Not applicable. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> Yes. <i>Do you have any outstanding issues?</i> This Council does not agree with the principle of Direct Elections. This Council agrees with the petition of N.A.P.T.C to the House of Lords but with the important rider that the Parish Councillors be chosen from Parishes with access within the Executive Area of the Broads Authority.</p>
Vice Chairman of a	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p>

Parish Council	<p>Agree + support the principle.  <i>Do you agree with direct elections resulting in larger authorities?</i>          Agree with direct elections resulting in direct elections.  <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i>          Local Authority and Secretary of State.  <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i>          Yes – Only if there are no direct elections. Our preference is for Direct Elections and accountability.  <i>Do you have any outstanding issues?</i>          As the Broads Authority is a planning authority it must reflect the local view through direct elections. The appointment of members by Secretary of State is unnecessary and they are not accountable to the electorate. Perhaps they could have an advisory role on their specialisations or put themselves up for election. They should not be decision makers.          If the Authority were directly elected there would be no need for blocs or groups as you propose here.</p>
Somerton Staithe and Boat Dyke Trustees	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          The Broads Authority has a direct impact on the lives of those who live within its boundaries. We therefore support the principle of Direct Elections and consider that the opportunity to elect at least 2 members is a democratic right for those living within the Broads Authority. Directly Elected members of the authority would complement and balance the existing appointee membership. It is important that there should be an elected input to planning decisions within the National Park as there is with local authority planning decisions. Those living within the boundaries have a right to express their wishes, and to comment via the democratic process.  <i>Do you agree with direct elections resulting in larger authorities?</i>          The authority should remain about the same size, with 21/22 members. Anything larger would be less efficient.  <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i>          Equal number of members from the national and local councils should be replaced. (i.e. One or two members from each category).  <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i>          We wish the Broads Authority to have directly elected members who many, but need not, be Parish members. It is important that there are representatives who do not represent commercial interests, pressure groups, or wealthy landowners.  <i>Do you have any outstanding issues?</i>          None.</p>
British Reed Growers Association	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          Supports the principle of Direct Elections to the Broads Authority. This would promote local democracy and give the Authority more legitimacy.  <i>Do you agree with direct elections resulting in larger authorities?</i>          Agrees with direct elections resulting in larger Authorities. However, the total number of Members should not exceed 22 thereby keeping the same composition as the majority of English National Parks.  <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i>          Believes that there should be two Parish Council Members, one from the Northern area and one from the Southern area. The Parish Councils should decide who would represent them.  <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i>  <i>Do you have any outstanding issues?</i>          Suggests that the future Broads Authority should consist of the following membership:         <ul style="list-style-type: none"> <li>- 8 members appointed Nationally by the Secretary of State</li> <li>- 8 members appointed by the District Councils or Unitary Authorities</li> <li>- 2 members appointed Parish Councils subsequently appointed by the Secretary of State</li> <li>- 2 members appointed by Direct Elections by those residents within the BA boundaries.</li> <li>- 2 members appointed by the Navigation Committee.</li> </ul>         Total membership would be 22 as per the majority of English National Parks.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          I agree with and support the principle of Direct Elections.  <i>Do you agree with direct elections resulting in larger authorities?</i>          I do not agree that it should result in larger authorities.  <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i>          To remain the same size, some local authority members should be replaced if affected by reorganisation, but otherwise National members.  <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i>          I do not wish the Broads to have Parish members.  <i>Do you have any outstanding issues?</i>          I do not have any outstanding issues.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          Yes – People who live in the Broads Area 24/7 should understand the local issues regarding the management of the Broads. They would understand the needs of the impact that tourism/leisure industry has on the Broads system and the surrounding villages and the importance of this industry that helps to keep this area alive.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          Yes – surely anyone living in the Broads Authority area should have a say how the Broads are managed.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          Yes - good idea to have local representation.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          Yes – Someone who not got any affiliations for any political party or union who would listen to people who live in the area and put forward their views.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>          Yes – The BA must represent all parties and local communities are an essential part of this mix. Local representation will ensure that the big boys don't dictate to all.</p>











contributed by the present local authority members. Likewise, the replacement of the experience provided by Secretary of State appointees would not be conducive to the effective management of the Authority's responsibilities. And any reduction in of the representation from the navigation interests would deplete the ability of the Authority to fulfil its duty in that respect, as well as having repercussions upon the economic well-being on the Broads due to the strong tourism link. There was no real consensus on which current members should be replaced by directly elected members, but the most overarching view was to replace national and local authority members with directly elected ones. The main reason for that was to increase local representation.

Support for Direct elections was stronger than support for Parish Members (50% in favour and 50% opposed). Several respondents suggested that local government re-organisation may enable parish members to be incorporated without increasing the size of the Authority. The Authority itself was opposed to Parish members if such members would be introduced at the expense of reducing any of the existing categories of members.

### Dartmoor:

Respondent:	Comments:
Dartmoor National Park Authority	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Not supportive of the principle of direct elections as it cannot see how they would improve the effectiveness of the organisation or the National Park.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> The size of the English National Park Authority membership was considered during the review of English National Park Authorities in 2002. Consequently, the English National Park Authorities were reduced in size. We do not support any increase in the number of members on Dartmoor National Park Authority. It remains the case that the size of English National Park Authorities (given their duties and responsibilities, staffing establishment and budget) is out of proportion to those operating at a District and County level. It is also the case that most private sector organisations would not operate with a 'Board' as large as 22 members for an organisation of this size. Nonetheless, the mix of members together with the expertise and experience they bring to the National Park Authority has proved to be extremely beneficial.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> The Authority does not believe that introducing direct elections would improve the efficiency of the Authority but if the Government is minded to implement direct elections they should relate to the parish members of the National Park Authority. We have concluded from the forward to the consultation that the Government is not considering direct elections for national members because of the practical difficulties and cost. We support this conclusion. Reference is made to the possibility of introducing direct elections for local authority appointed members. Such a change would have the effect of disenfranchising the local authorities with whom National Park Authorities work. There would also be serious repercussions in relation to our influence with other bodies, particularly at a regional and national level, and this would impact on our joint work on affordable housing, sustainable economic development, strategic planning and transport provision. The achievement of the National Park Management Plan requires the active involvement of constituent local authorities as well as regional bodies. Such changes would potentially reduce the effectiveness of the Authority and the National Park.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> We have no view on this matter.</p> <p><i>Do you have any outstanding issues?</i> The Authority recognises that the current consultation relates to the 'principle' of direct elections but if the Government were to pursue this option then careful consideration must be given to the detail of the new membership arrangements to ensure that there are clear benefits. The costs of direct elections must be fully funded by central government. The current system, from the perspective of Dartmoor National Park Authority, working well and it is difficult to see how direct elections would improve the effectiveness of the National Park Authority or the National Park.</p>
Devon County Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> No change should be made to the existing system for appointing National Park Authorities. It believes that these work extremely well – at least in the South West of England – and that arrangements to introduce direct elections would be both expensive and otiose.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Even before Schedule 7 to the Environment Act 1995 set down this responsibility the County Council has always considered that it was important to appoint as it nominees on both the Dartmoor and Exmoor National Park Authorities (formerly Committees) elected members whose divisions were either wholly or partly within the Parks or at least close to their boundaries. Since the District Councils in Devon have consistently followed the same principle it is hard to see that here can be any democratic deficit in these appointments – who have the added advantage of being involved in all aspects of local government and not limited to exclusively National Park functions. The County Council is also firmly of the view that properly exercised (as they almost invariably have been over the last forty years) the Secretary of State's power to appoint independent members to National Park Authorities has been to their very great benefit in ensuring that a proportion of the Authority has (a) expertise and experience not necessarily to be found amongst elected members and (b) an element of detachment to view local pressures within the national perspective.</p>
West Devon District Council	<p>The Borough Council is not convinced by the contents of your document; their detailed knowledge of the workings of the Dartmoor National Park Authority leads them to the conclusion that Direct Elections would not be an improvement on the present system. Under the present arrangements, a large number of National Park Members, have in fact, been through an election process, albeit to secure a place on a County, District, Borough, Parish or Town Council. Providing the appointment of Members by the Secretary of State is open and transparent and accords with the Nolan Principles, the Council sees no need for any change.</p>
Devon Association of Parish Councils	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> We object to the principle of Direct Elections to National Parks because we believe that: (a) there would be a danger of the elections being politicised and we would not want to see candidates with a political agenda being elected to serve on National Parks.; (b) there would be a danger of single-issue candidates being elected who</p>

	<p>would have a very narrow agenda and no real interest in the wider issues facing National Parks; and (c) there would be a substantial cost in having direct elections and this would have to be funded by the taxpayer.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>We would oppose the idea of a larger number of members serving on National Parks because this would make them too big and unwieldy and also more costly to run. The number of members serving on National Park authorities has recently been reduced for these reasons and it would be a retrograde step to now increase the membership.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>We are opposed to direct elections but if they were introduced then we would not wish to see the number of parish councils reduced because they are resident in the National Park and therefore fully aware of local issues. We feel any cut in council representation should be made from county council and district council appointees, with the main cut being made in the number of county councillors because they are least likely to actually reside in the National Park.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>We do not feel in a position to comment.</p> <p><i>Do you have any outstanding issues?</i></p> <p>In our view there should be more parish and town council appointees serving on National Parks because as grass roots councillors they have a good understanding of local needs and concerns. The boundary commission has finished consulting on its proposal for a Devon unitary. If a Devon Unitary is created at best there would be only one Devon unitary councillor appointee living in the Exmoor National Park and because of the large ward size it may well happen that there is not even one. Somerset is not going to have unitary government so there would be a serious imbalance on the Exmoor National Park with the Somerset side having most of its district and county council appointees living in the Park and pressing hard for Somerset interests. The Devon side would inevitably suffer because from the Devon Unitary there would be at best one local representative with similar knowledge and involvement in local issues. Ideally each district and county council should have one representative the National Park but with the same provision that such representation shall be resident in or near the National Park. The remainder of council representatives should be appointed by parish councils. This would ensure that the majority of council appointed members actually lived in the National Park.</p>
Bridford Parish Council	<p>Those relating to legitimacy and "democratic deficit". It is argued that local accountability is secured because many members are "indirectly elected" (i.e. Parish County, District etc). It is worth noting that National Park Authorities have always had a tradition of being non party political and that any directly elected members would always be in a minority. The evidence shows that in general members emerging from direct elections would be little different from the existing mix, but there are anxieties about individuals perusing personal political goals. Directly elected members would not much alter the effectiveness of National Park Authorities unless by chance, exceptionally gifted people were elected. Costs and practical issues of running direct elections. The Scottish experience of running direct elections shows that it is feasible and costly. Expected costs for postal ballot around £30,000. After much discussion, Bridford Councillors do not feel that they wish to support it and that said the next three questions are not applicable. Regarding the election of Parish members, this deserves more publicity and councillors need to be encouraged to stand. Competitive elections would be good. Parish Councillors do represent "grass root" opinions. A greater proportion of members should come from Parishes within the area of the National Park. For example, if the total number of members is 22 and 12 are from District/County/Unitary Authorities, then those from Parishes should be at least 6 or 7 with National members reduced to 4 or 3. There is also concern over the proposed redistribution of members in Northumberland after the creation of the Unitary Authority so that the National members become a far greater proportion than at present. The existing District Council members should be allocated to the community councils. It is likely that the same allocations would be applied to Devon.</p>
Buckfastleigh Town Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>Members do not agree with the principle for Direct Elections for National Park and Broads Authorities published on 28 July 2008 for the following reasons (a) it is believed that this would create larger and more remote authorities which would not necessarily be in touch with the varied and individual needs of local communities; (b) if the current authorities remain the same size more local authority and parish members should be represented in the membership. It is essential that a wide variety of relevant organisations and individuals participate at all levels; (c) on balance members do not see the need or advantage of direct elections and that the current system should remain the same.</p>
Brentor Parish Council	<p>The Parish Council at it's meeting on 22<sup>nd</sup> Sept 2008 have recorded that it does not wish to see any changes to the present procedures which they consider to be satisfactory.</p>
Peter Tavy Council	<p>Supports the principle of the Authorities comprising directly elected members only.</p>
Hennock Parish Council	<p>The members of Hennock Parish Council (Teignbridge) have asked me to inform you that, having studied the consultation document concerning Direct Elections to National Park Authorities, they are in favour of the principle of directly elected representation, but would like more information on the arrangements.</p>
Lydford Parish Council	<p>The Council has no distinct preference.</p>
Ugborough Parish Council	<p>The Parish Council would be in favour of greater democracy at Dartmoor National Park Authority.</p>
The Dartmoor Society	<p>Concerned about the democratic deficit of Dartmoor NPA. Strongly in favour of direct elections for all members except the Secretary of State appointees. This would lead to a 'ownership of the decision-making process. The Society believe the Authority membership should remain at it's current size but would not object to a small increase.</p>
Local Respondent	<p>I agree to and support the principle of direct elections to national parks. I do not agree to direct elections resulting in larger authorities. All council members should be replaced with directly elected members i.e. county district and parish. No view on Broads. I am certain that direct elections of parish and what are now district and county council members would serve park purposes and the electorate much better than the unaccountable and therefore weak membership of the present authority which has resulted in the officer dominated, inconsistent and subjective decisions on planning and other matters the parishes of Dartmoor have suffered in the last few years.</p>

The principle of Direct Elections was only supported by five stakeholders, three Parish Councils, the Dartmoor Society and an individual. All the local authorities and the Association of Parish Councils are opposed to the principle of Direct Elections because the existing system is working well and that direct elections would be counterproductive and expensive. Arguments against direct elections have been raised by the Association of Parish Councils who point out that (a) there would be a danger of the elections being politicised and we would not want to see candidates with a political agenda being elected to serve on National Parks; (b) there would be a danger of single-issue candidates being elected who would have a very narrow agenda and no real interest in the issues facing National Parks; (c) there would be a substantial cost in having direct elections; and (d) local accountability is secured because many members are “indirectly elected” (i.e. Parish County, District etc). A Parish Council points out that the evidence shows that in general members emerging from direct elections would be little different from the existing mix, but there are anxieties about individuals pursuing personal political goals. No one supported larger authorities.

If direct elections were to be introduced, the National Park Authority has pointed out that direct elections in place of local authority members would have the effect of disenfranchising the local authorities with whom National Park Authorities work. There would be serious repercussions in relation to their influence with other bodies, particularly at regional and national level, and this would impact on their joint work on affordable housing, sustainable economic development, strategic planning and transport provision. The achievement of the National Park Management plan requires the active involvement of constituent local authorities as well as regional bodies. Such changes would potentially reduce the effectiveness of the Authority and the National Park. The County Council is firmly of the view that properly exercised (as they almost invariably have been over the last forty years) the Secretary of State’s power to appoint independent members to National Park Authorities has been to their very great benefit in ensuring that a proportion of the Authority has (a) expertise and experience not necessarily to be found amongst elected members and (b) an element of detachment to view local pressures within the national perspective. West Devon District Council also point out that under the present arrangements, a large number of National Park Members, have in fact, been through an election process, albeit to secure a place on a County, District, Borough, Parish or Town Council. Providing that the appointment of Members by the Secretary of State is open and transparent and accords with the Nolan principles, the Council sees no need for any change. The Association of Parish Councils do not want to see the number of parish councils reduced because they are resident in the National Park and therefore fully aware of local issues. They feel any cut in council representation should only be made from county council and district council appointees, with the main cut being made in the number of county councillors because they are least likely to actually reside in the National Park. One Parish Council mentions that if direct elections could create larger and more remote authorities which would not necessarily be in touch with the varied and individual needs of local communities.

## Exmoor

Respondent:	Comments:
Exmoor National Park Authority	The Authority does not support the principle of Direct Elections and considers that the existing membership arrangements should not be changed. The existing arrangements for membership of the Authority work well. The appointment of National Members enables the Authority to benefit from a wider perspective and the contribution made by National Members is valued. The majority of the Authority’s membership is drawn from Parish Councils and constituent local authorities. This arrangement allows the Authority to achieve valuable engagement and close working relationships with these organisations, which contributes significantly to the Authority’s effectiveness. It also ensures that the issues facing the National Park Authority are understood at County, District and Parish level. Members appointed by the County, District and Parish Councils have been elected to those organisations by local people and therefore indirectly elected to the Authority. Local authority and Parish Members provide local representation and have strong connections with the communities of Exmoor.
Somerset County Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>Objects to the principle of direct elections because the current arrangements of different types of members leads to a balanced representation; direct elections would dilute local government’s democratic mandate and local accountability; elected representatives on the authorities from areas not within the park enables a link between the Park and the wider areas; current Parish council in-direct selection process works particularly well whereby a good proportion of Park Authority members are responsible solely to the local electorate; the circumstances in Scotland are not directly comparable with Exmoor (Scotland has no Parish Councils) hence why in spite of some directly elected representatives, they have a lower proportion of local representation within the membership of their park authorities; single issue elections and appointments that would not necessarily have the overall interests of the national park or its communities at heart; larger settlements dominating smaller settlements in terms of candidates coming forward in the event that the directly elected members replace existing parish members; party politics; and costs of running direct elections.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>Objects. The current size of the Authority enables a good balance between locally elected members and other members assisting decision making. They agree with circular 12/96 that the national park authorities should be as small as possible consistent with effectiveness and the equitable distribution of local representation.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p><i>We don’t believe that any existing members should be sacrificed for the sake of directly elected representatives.</i></p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>This is not relevant for Somerset County Council</p> <p><i>Do you have any outstanding issues?</i></p> <p>No.</p>
West Somerset Council	The present system works well and should not be changed. The issue of direct elections has not come about as a result of any problems within the system currently operating. Direct elections may result in people standing on

	<p>single issues, and this would not be desirable. The current system has strong local routes and ties local authorities to the National Park and this could be driven apart by direct elections. The principal of direct elections is supported however, Council representatives are elected indirectly. After due deliberation it was resolved that Defra be advised that West Somerset Council does not support the principle of direct elections to English National Parks and recommends that the present system should remain in operation.</p>
Somerset Association of Local Councils	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> The Association objects to the principle of direct elections to the NPA</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> The Association does not agree with the suggestion of larger authorities. There does not appear to be any evidence that shows a clear benefit for the additional costs involved.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Member councils recognise the contributions made by the principal authority appointed members and the nationally appointed members. Given the condition that there are to be directly elected members and a same-sized NPA. Members note that the representation for the local people should remain paramount and therefore are a little divided on whether the County/District/Unitary members should be replaced or the nationally appointed. The essence remains that the number of non-party politicians who serve their local community should not be reduced – the reduction, if any, should on balance, be taken by the principal authorities. This association firmly objects to any suggestion that the indirectly elected Parish Members should be replaced. The election procedure works well, is understood in the communities, and produced local members with a clear local interest in the work of the NPA.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> This Association has for some years supported the proposals made by our colleagues in Norfolk that the Broads Authority should be treated on the same basis as all the other National Parks. It follows that the Broads Authority should include indirectly elected Parish Members on the same terms as the others. The indirect election process appears to have worked well in all NPA areas and appears to have produced effective local members who have made significant contributions to their Parks. Each member produces a CV or similar and will have been seen at Parish /NPA gatherings – they are known to the people in the Park and are approachable within their area. The Broads should have the same opportunity for the people who live and work in the area.</p> <p><i>Do you have any outstanding issues?</i> A number of comments have been made in responding to this question. Principally, it works why seek change. Leave us alone and let us do things in our way in our locality. The direct working relationship with the Parishes and the NPA is invaluable.</p>
Combe Martin Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Basically agree although concerned about the cost, could give Parks an extra concern, their funding is already light.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> No, there was a reduction in size 2007, why alter it again.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> National members.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> N/A</p> <p><i>Do you have any outstanding issues?</i> Elected members should be sought from within the Park.</p>
Exmoor National Park Authority Member	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Blackpits Cottage Issue. Whether direct elections prevail or not, I believe that my own National Park should be democratically constrained in its decision making. At present it functions as a quasi local authority but with a very loose decision making structure. I believe the role and responsibilities of members should now be clarified and enhanced, by having a chairman and Cabinet of elected members who role is to determine the strategy and agenda; I suggest that Secretary of State members might sit in cabinet but in a non-voting capacity.</p>

The principle of Direct Elections was only partly supported by a parish council and a former member of Exmoor National Park Authority. All the other stakeholders consider that the existing membership arrangements should not be changed. The existing arrangements for membership of the Authority work well. The appointment of National Members enables the Authority to benefit from a wider perspective and the contribution made by National Members is valid. The majority of the Authority's membership is drawn from Parish Councils and constituent local authorities. This arrangement allows the Authority to achieve valuable engagement and close working relationships with those organisations, which contributes significantly to the Authority's effectiveness. It also ensures that the issues facing the National Parks are understood at County, District and Parish level. Members appointed to the County, District and Parish Councils have been elected to those organisations by local people and therefore indirectly elected to the Authority. Local authority and Parish members provide local representation and have strong connections with the communities of Exmoor.

The County Council echoes many of those arguments and points out that direct elections would dilute local government's democratic mandate and local accountability; elected representatives on the authorities from areas not within the park enables a link between the Park and wider areas; current Parish council in-direct selection works particularly well whereby a good proportion of Park Authority members are responsible solely to the local electorate; the circumstances in Scotland are not comparable with Exmoor (Scotland has no Parish Councils) hence why in spite of some directly elected representatives, they have a lower proportion of local representation within the membership of their park authorities; single issue elections and appointments that would not necessarily have the overall interests of the national park or its communities at heart; larger settlements dominating smaller settlements in terms of candidates coming forward in the event that the directly elected members replace existing parish members; party politics; and costs of running direct elections. The

other stakeholders echo those views. No one supports any changes to the membership other than local authority if direct elections were to be introduced. There is no real consensus on which member to replace.

## Lake District

Respondent:	Comments:
<p>Tim Farron MP (Westmorland and Lonsdale)</p>	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> I agree with the principle of direct elections, and my justification for this is the need to ensure the people who live and work in the national park area are properly represented on the park authority. Approximately 50% of my constituency falls within the boundaries of the Lake District and Yorkshire Dales national parks, meaning the decision of both national park authorities affect a large number of my constituents. LDNPA and YDNPA are, for example, the main planning authorities for those areas of my constituency which fall within the park boundaries. However for the rest of the constituency which falls within park boundaries. However, for the rest of the constituency that responsibility rests with South Lakeland District Council, a directly elected body, comprised of members who are democratically accountable to those they represent.</p> <p>I am aware of the argument that many members of national park authorities are appointed from constituent local authorities, and that there is no need for direct elections as a large proportion of the members have already been elected once in county and district elections. However, I must argue that this form of indirect election does not give a national park authority sufficient democratic legitimacy, given the considerable scope of its portfolio. Local authority members are elected on the basis they best represent their wards/divisions (which sometimes do not fall within park boundaries), not the national park. Direct elections would make the park authority directly accountable to its electorate, and less likely to make decisions that would have a negative impact on those residents that live within or around park boundaries. A directly elected element in the park authorities would most certainly improve the dialogue between the authorities and the residents of the park. Directly elected members would directly represent residents on park issues, liaising with residents and bringing their concerns to the park authority. Residents would have a 'voice' increasing the democratic legitimacy of the authority.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> No, in this matter I concur with the Environment Act 1995 which states that "membership of each NPA should be kept as small as possible consistent with effectiveness and an equitable distribution of local representatives". Furthermore, larger authorities would result in a smaller proportion of members being directly elected.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> I believe that the skill sets brought by national members are of great value to the park authorities in my constituency. National members also do a great deal to represent the significance of the parks nationally. For these reasons I would not be in favour of replacing national with the directly elected members. 12 of the 22 members on both the Yorkshire Dales and Lake District National Park Authorities come from County and District Councils, representing the close ties between local government and the park authorities. This relationship is vital in ensuring that the two bodies work in partnership, and not at odds, with one another. Members from local government play an important role in both achieving the parks' objectives and representing the wellbeing of local communities. For these reasons I would not support the replacement of local authority with directly elected members. It may be reasonable to infer therefore, that direct elections would only replace those members from parish councils. As such, parish members are put forward collectively by their parishes for appointment by the Secretary of State to represent parishes whose land falls within the park boundaries. I would argue that this system could quite easily be replaced with one by which residents of these parishes could put themselves forward for election by all parish residents. This would perhaps rectify the current situation- whereby a parish councillor could be appointed simply because there is no other person for the job – and provide the park authority with a greater degree of credibility and democratic legitimacy.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> I have no view on this matter.</p> <p><i>Do you have any outstanding issues?</i> To conclude, I would like to add that whilst direct elections would give local residents a much needed voice in the decision making process of the park authorities, they are somewhat a token gesture given the statutory aims of the English National Park Authorities. In Scotland's case, the obligation to the communities within the park is directly implied from the outset. In England's case, and indeed in my constituency, the economic wellbeing of these communities and the statutory aims of national parks are often in direct conflict with one another. I praise the work of national park authorities in conserving the natural beauty of these magnificent areas, but at the same time one must take into consideration the very real need of thousands of people who work and live within the park boundaries. I understand that park authorities are there to represent the national parks to the whole country, but this does not mean they shouldn't demonstrate a degree of democratic accountability to those people who live there.</p>
<p>Chief Executive Lake District National Park Authority</p>	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Although the authority is not opposed to the principle that direct elections could have a role in some national park authorities, it considers that its response to the consultation must be based on whether such changes would be likely to make a positive contribution to achieving locally the purposes for which the Authority was established and fostering of the economic and social wellbeing of communities within the Lake District National Park. For the reasons set out below, the Authority does not consider that direct elections to the Lake District National Park Authority would make such positive contribution. The existing membership structure of the Authority serves the communities of the national park well in that it provides a close relationship between the Authority, the county and district councils whilst also providing representation from local councils. Local authority members serving on the Authority have been appointed from those living within the National Park as well as outside its boundaries. This has helped the Authority to understand the issues (including particularly housing as well as from the position of communities within the national park. The Authority also derives benefit from having members who serve in influential positions in their appointing authority, thus ensuring national park issues are understood by those making decisions in those authorities.</p> <p>The Authority is concerned that the introduction of direct elections at the expense of any of the existing representation from local authorities would inevitably weaken the links between the Authority and those bodies, which would in turn result in a less joined-up approach to the common issues faced by each of us in addressing the needs of the national park and its communities. Although the consultation paper and Ministerial forward make</p>

	<p>reference to the current arrangements for the national parks in Scotland it must be noted that the constitution of Scottish national parks differs in some respects to English national parks. There are some differences in the statutory aims and, despite having some directly elected members, the proportion of nationally appointed members is greater in Scotland than in England. The Authority does not consider that the Scottish approach should necessary be taken as a template for England.</p> <p>The introduction of directly elected members could give rise to a fragmentation in local representation caused by a growth in “single issue” or “single community” biased members who would stand on a platform of support or opposition to particular policies rather than the overall interests of the national park or its communities as a whole. It would seem likely (particularly if it were decided that directly elected members should replace existing parish members) that the larger towns within the national park would benefit to the greater detriment of smaller communities as they would always be able to command a greater share of the popular vote. Current arrangements for selection of parish councillors by ballot organised by the Cumbria Association of Local Councils work well and ensure that smaller parishes are not disadvantaged.</p> <p>The Authority has never operated on the basis of party politics. Local authority, Secretary of State and parish members have always strived to act in the interests of the national park authority, rather than in the interests of their appointing body or any political party. There is a risk that the introduction of directly elected members would give rise to the introduction of party politics. It is considered that this would be an unnecessary distraction and not in the interests of the national park or its communities.</p> <p>The Authority is aware of the concerns of some local people that “unelected” members of the Authority should not be making decisions in relation to planning applications. The fact remains, however, that 12 out of 14 members on the Authority’s current Development Control Committee are elected representatives of county, district, or local councils. All but the four Secretary of State appointed “national” members have in fact been elected twice by local people: firstly when standing for election for the respective county, district or local council and secondly by the selection process which appointed them to the Authority. Planning policies applicable in the national park are subject to the same arrangements for consultation and examination in public as for all other local planning authorities. The Authority is open to looking at ways of improving links between Authority members and members of the public and local communities. Although the Authority accepts that it will have to continue its efforts to ensure local people have confidence in the development control process it is not of the opinion that the introduction of directly elected members would improve decision making or accountability.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>The Authority has benefited from national members. It is important that the national significance of the national park should be reflected in the membership and the Authority would not wish to lose its S of S members to enable the introduction of directly elected members at the cost of representation from local authorities would reduce the capacity of the Authority, which, as presently constituted is able to “punch above its weight” as a result of working partnership with others. The existing system for parish members has a good track record at community level and the involvement of parish council members is helpful to the Authority. The Authority acknowledges the need to find better ways of working more closely with local communities but does not believe that this can simply be achieved by introducing a new category of directly elected members. The Authority Communication and Engagement Strategy, adopted in May this year looks at ways in which members, staff and volunteers can work more closely with different local communities and groups, as well as with partner organisations to enable it to respond better to local needs. It believes that it has achieved a great deal in recent years, but knows that there is much more to be done.</p>
Cumbria County Council	<p>The conclusion researched by the Cabinet was that Councillors who sit on National Park Authorities provide a valuable link between Councils and the Park Authorities, they have the democratic mandate to represent their communities and can act in a more joined up way than the ‘one issue’ elected representatives being consulted upon. The creation of further elections would introduce further expense, at a time when turnouts are already low, which would have to be publicly funded. The addition of another layer of elected representatives to serve solely on National Park Authorities would result in further confusion about roles and responsibilities in the minds of the public and would seem at odds with the current thinking around enhanced two tier working and the move towards the unitary form of governance.</p>
Cumbria Association of Local Councils	<p>Parish Councils in Cumbria do not agree with the principle of Direct Elections. They would not like to see larger authorities. They would not like to see any current members replaced by directly elected members. They have no view on the makeup of the Broads Authority. They would like to make the following observations. The current mix of appointed councillors and other members is working well. There is little or no interference from political parties, there is a good balance of local, regional and national knowledge and reviews of the authorities’ working have not given any reason to suggest there are any problems. Whilst welcoming the review of the democratic mandate and credibility of the National Park authorities, parish councillors have a number of concerns which lead them to conclude that the present system is adequate. These concerns include the additional expense of another election process. In Cumbria we have three tiers of directly elected local government already. Parish councils in Cumbria do not want to lose the representation they currently enjoy on the Lake District National Park Authority. There also seems little point in expanding the membership of the authority unnecessarily. Some councils are concerned that any directly elected members of the National Park Authority might use their candidacy as a platform for single issues. This would not be in the wider interests of the community or the nation. The Consultation seems to draw heavily on the experience in Scotland. From a Cumbrian perspective this is not comparing like for like. In the Cairngorms and Loch Lomond and the Trossachs, the local government structure in unitary. There is no parish or district tier of government, so any expansion of local accountability for local issues would appear beneficial to people seeking an improvement of local influence. In Cumbria, different factors apply and there is not widespread call to address any democratic deficit in this context.</p>
South Lakeland Strategic Partnership	<p>There is significant concern about the NPA’s interpretation of planning legislation. However, SLSP does not support the principle of direct elections to NPAs, not least because of the likelihood of those direct elections undermining the role of existing elected members. Whilst National Parks are national treasures, they are living landscapes with resident populations. As such, the people that live and work in the Parks should have significantly greater representation on NPAs than those representing the national interest. In keeping with the above response, SLSP is currently seeking to increase local influence on the management of local issues through the development of a number of ‘Local Area Partnerships’ – clusters of parishes that see themselves as a community in terms of the need to effect local policies and strategies.</p>

Allithwaite Upper Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> I think we don't need direct elections to the NPAs as well have councillors and you may get single issue people with no idea of all rounds issues.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> I don't have a problem with direct elections, elections will almost certainly coincide with either District or County Council elections, so there are no serious cost implications and I feel there is a need for a more democratic feel to this body. I disagree with direct elections especially if increasing the size of the authority. If authorities were to remain the same size, which members should be replaced in favour of directly elected members? No comments made.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> I do believe there should be parish members and perhaps 1 from each district council area so that the area is represented by a district councillor and a parish member from the same area.</p> <p><i>Do you have any outstanding issues?</i> As for people to go on Public bodies, this is far too divisive.</p>
Blawith and Subberthwaite Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> In principle we are in favour of the idea of direct elections as a way of increasing democratic legitimacy and accountability.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> We are not in favour of increasing the size of National Park Authorities. In our view any benefit in increased size is unlikely to justify the additional cost; further we consider it more likely that an increase in size would impair the efficiency of the Authority's working than improve it.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Prefers to replace the National members because they have the least democratic legitimacy. But it appreciates the logistical and financial difficulties of doing this, and they value the national perspective. It points out that other membership categories (Local Authority and Parish members) have some democratic legitimacy from having already been elected to their respective Councils and recognises the value of having people serving as members of both a principle authority and the National Park Authority to avoid conflict and improve mutual understanding. Nevertheless, the current division of six County Council and six District Council seats makes it challenging for the District Councils to achieve a political balance of appointees under the Local Government and Housing Act 1989 and in the eyes of their electorate. Issues of political infighting. Only two of the County Council and two of the District Council appointees have Park residents in their electorates. Requests that (a) Local Authority appointees are replaced by directly elected representatives in the hope that this will encourage people with a genuine interest in the Authority's work to become members of the Authority. Such directly elected members to have their primary place of residence in the National Park. The electorate for such directly elected members to be restricted to those resident within the National Park. Failing this, they would prefer to retain the current system. Parish Council politics seem relatively free of Party politics, invariably resident within the Park and intimately acquainted with the issues at a grass roots level.</p>
Colton Parish Council	<p>The Council sees both advantages and disadvantages to the proposals and would make the following points. The current system has worked well over the last few years. However, inevitably there is still room for improvement, especially in relation to the key issues of representatives and diversity. Also a further concern is the length of service of many of the members which, while ensuring continuity of policy and practice, can prevent the introduction of new blood and fresh thinking. While we recognise the case for having some directly elected members, we are concerned about a number of possible consequences, including: (a) the desirability of single-issue candidates, (b) larger communities dominating the Authorities, (c) elections becoming too political, (d) the Authorities becoming overly large, and (e) costs and the source of funding. As far as Parish members are concerned, we believe that they bring a high level of local expert knowledge about communities and traditions, farming and land management. We are told that, in the LDNPA, it is the Parish representatives that tend to be the most enthusiastic members with a real grasp of what would and would not work in their communities. In terms of representatives, it is worth noting that Parish members (as is the case with County and District representatives) are, in effect, already elected twice: once as Councillors at the Parish level and then elected from Associations to serve on the Park Authority. Thus these members are more democratically accountable than are appointed members. In conclusion, we recommend that the call for direct elections is rejected, especially at the expense of Parish members, and that other ways of making Authorities more diverse and more representative within the present system are explored (including the possibility of time-limited service which would increase the opportunities for diversity and rejuvenation).</p>
Duddon Parish Council	<p>We disagree with the principle of Direct Elections. It is not the membership of the authorities which is important but the vision and leadership of the Chief Officer. We disagree with larger authorities. It increases costs and delays decisions. No change in the composition of the membership necessary.</p>
Embleton and District Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> The present system of recruiting members for our National Park Authorities seems to work well in achieving a balance of appropriate knowledge and expertise as well as in maintaining a broad representation of both local and national perspectives in relation to National Park matters. However, we believe that this balance in the management of nationally important assets could be improved further if party politics and political interests could be further distanced from policy setting and management processes within our National Park Authorities. We believe the introduction of a direct election system for local members would be likely to achieve a more directly democratic process and would be widely perceived to be more sensitive to a broader range of opinions and needs. Additionally, though, it is our view that because our National Parks are also made up of living communities that need, albeit in a sensitively managed way, to change and to develop in order to remain self-sustaining, we strongly believe that within any future recruitment system, the present level of truly local representation and influence needs at least to be maintained.</p>
Keswick Town Council	<p>The Town Council supports the current membership arrangements.</p>
Staveley with Ings Parish Council	<p>Prefers to retain the existing system rather than replace the four parish council members with four directly elected members. Members feel that the current method of selecting parish representatives is the best way to ensure that local people are represented. Following points:</p> <p>(a) Local authority appointees are elected by local people within the area served by the County and district councils. But the representatives can on occasions try to protect their parent authority to the detriment of local people on political grounds. This means that they may not always represent the best interests of local people.</p>

	<p>(b) SofS appointees are to represent the interests of the wider population of Britain, not local people. This council has no problem with this arrangement.</p> <p>(c) The Parish representatives are elected by their peers in the parishes to serve on the Parish Council. The parish councillors within the authority's area then elect four representatives from amongst their numbers to serve on the authority. This ensures that as far as it is possible at least four members of the authority are local people representing truly local views and aspirations. If, as suggested in the consultation papers, these four representatives were to be elected by universal suffrage within the area, it could open the door for people with a particular personal ambition or goal to gain election as a member then pursue that goal irrespective of the interests of local people. If there is a need for elections, why not elect all members of the authority or at least all those members currently appointed by the various levels of local government? In addition, in the current financial climate, it would be a complete waste of money to inflict unnecessary elections of local tax payers. The money could be much better used within the National Parks.</p> <p>(d) Does not see any need to increase the size of these authorities. The membership of the authorities was recently decreased and this does not appear to have affected their ability to operate.</p> <p>(e) The council prefers no directly elected members, but if there are to be such members, it should be all those currently appointed by all tiers of local government. Are there sufficient local people out there who want to be elected to these authorities? Members of this council get the impression that some District and County Councillors are reluctant to be appointed to them.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Does not support the principle of Direct Elections for the following reasons (i) the current membership mix works well, like a Local Strategic Partnership type-model, with all levels of government working together; (ii) the Parish Members are elected through a local election process tailored to each NPA and confirmed by the Secretary of State (the Scottish NPAs do not have Parish/Community Council members); (iii) difficult to devise a cost effective process to enable a wider public vote than just local constituents; (iv) local constituents vote in their County District/Borough Councillors; (v) local NP direct elections separate from the local authority elections would attract weaker local authority candidates who failed to be elected against stronger calibre Councillors; (vi) single issue candidates and politicisation of NPA decision-making.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> FLD do not support direct elections or resultant larger authorities. The size of NPAs was reduced following the NERC Act 2006 in the interests of good governance and to retain the balance of national and local interests. We have a concern that the national value of NPs is not being fully reflected by some members.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Does not support direct elections, but if they were to be brought in we would want to replace a proportion of local authority (County, District and Parish) members. We would be strongly opposed to direct elections for Secretary of State nationally appointed members, if indeed a cost-effective process could ever be devised.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> No comment.</p> <p><i>Do you have any outstanding issues?</i> We have two additional points. Firstly, in the interest of good governance and to ensure equity with Secretary of State national appointments, we would recommend a maximum fixed term of office for all categories of local authority members (taking into account the election cycles) of three times four year terms. They would have to have a minimum of one year off the NPA before they could be re-appointed by their constituent local authority. Secondly, we would welcome local authority nominated members to make a statement upon appointment that they will take into account NP purposes and duty in exercising their decision-making function. This could be linked to NPAs Standing Orders and Codes of Conduct guiding membership activity.</p>
Local Respondent	<p>I would be against direct elections for the following reasons based on my knowledge of the area where I live i.e. Cumbria within the National Park. The Lake District National Park has wide ranging responsibilities. It performs some of the duties of a local authority, acts as a Tourism body, acts to preserve the footpath network as well as all the environmental responsibilities. I fear that any directly elected member would only represent the views of the local population which, from experience are largely negative about the LDNP. They see the LDNP as preventing development, conserving everything, but the local residents, spending money on interpretation for tourists, controlling advertising and generally putting a damper on business. To appeal to the local electorate, a candidate would need to go against many of the aims of the National Parks. There is also a problem of finding candidates, any elections would inevitably involve the political parties just for the organisation. We already find it difficult to get candidates for the councils and many councillors in all parties sit on more than one council ie. District and County – we did not go Unitary in Cumbria. The electorate is pretty apathetic and would not welcome yet another election, having it on the same day would show up the overlap of membership with the councils. The current system is not ideal as County and District councillors sitting on the authority do not see their work for the LDNP as more important than Council work so probably the best people try to get on the council executive as a more powerful position than the LDNP. The members chosen by the government are therefore very important.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Opposed to the principle. Who would be the constituents, and how would they know the credentials of more than a handful of candidates? If there is to be no party element, and no manifestos with a realistic chance of fulfilment, how could an ordinary voter choose between people he/she doesn't know? The only way round this I can see is for various groups of parishes to have 'their representative', but even then ordinary candidates are unlikely to be known to more than a few of the electorate, making the chances of 'big-name' candidates who may or may not be the most suited getting the votes.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> Opposed. Sizes have only recently been reduced: why increase then so soon.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> The Parish reps are the obvious candidates; and yet these are the very people nearest to directly elected actually already on the authorities. It seems to me their method of election is a good model: one has to be keen enough to serve the community to be a parish councillor to start with, and then are elected by fellow councillors who have a reasonable chance of knowing you and your track record. In fact, I would suggest the county and district councillors are better candidates for replacing by direct election, if the principle of direct election were to be accepted. At present they are simply nominated by their councils: they could be elected in the same way as parish councillors, which would increase the election element. At present they bring an unwanted element of party politics to the Authority, and tend to a small extent to be 'career politicians'. I do not advocate direct elections, but if they are to happen would suggest the county and district councillors are the best to remove to</p>

	<p>make way for directly elected members.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>I have no knowledge of the Broads Authority.</p> <p><i>Do you have any outstanding issues?</i></p> <p>It has always seemed to me that the mix of National members generally concerned with the conservation of the National Parks and Parish, District and County members perhaps more concerned with the livelihoods of those who live and work in the area provides a useful background to debate. I see no overwhelming reason to change a system that is working well.</p>
Local Respondent	Issues of local representation.

The principle of Direct Elections was only supported by the local MP and an individual for reasons of democratic legitimacy and local representation. All other stakeholders opposed the principle of direct elections. They considered that the current system works well. The National Park Authority expressed concern that the introduction of direct elections at the expense of any of the existing representation from local authorities would inevitably weaken the links between the Authority and those bodies, which would result in a less joined-up approach to the common issues faced by each of us in addressing the needs of the national park and its communities. The Authority benefits from having members who serve in influential positions in their appointing authority, thus ensuring national park issues are understood by those making decisions in those authorities. The introduction of directly elected members could give rise to a fragmentation in local representation caused by a growth in "single issue" or "single community" biased members who would stand on a platform of support or opposition to particular policies rather than the overall interests of the national park or its communities. Current arrangements for selection of parish councillors by ballot organised by the Cumbria Association of Local Councils work well and ensure that smaller parishes are not disadvantaged. Those views were echoed by other local authorities and parish councils who also raised issues of cost and turnover rates for elections. Those stakeholders were concerned about the addition of another tier of local government on top of three existing tiers of local government elections at a time when turnout rates are low. Parish Councils do not wish to lose their representation on the Authority. The Authority is looking at ways to improve its relationship with local communities, but doesn't think that direct elections is the answer. No one supported larger authorities and the vast majority of respondents considered that the current membership system is working extremely well.

## New Forest:

Respondent:	Comments:
New Forest East Constituency Labour Party	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>No support for the principle of direct elections. Concerns with powers being given to a limited electorate; complications with the logistics and costs; and one issue parties or organisations.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>Neutral on this issue.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>Considers the current arrangements to be workable and fair.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>Preference to have few extra members. Considers that the current representative parish councillors serve the National Park and members well.</p> <p><i>Do you have any outstanding issues?</i></p> <p>The method by which Parish Members are selected locally for recommendation to the SofS could have some guidance to make it open and fit for purpose to get the right people. Thankfully Parish Council are not usually openly political but a few Parish Chairmen seem to hold a lot of sway in these recommendations.</p>
Julian Lewis/Desmond Swayne MPs New Forest East and New Forest West.	<p>Both MPs have always felt that the standard NPA model was most unsuitable for our area which had traditionally been protected by tailor-made legislation. The introduction of the NPA replaced a largely consensual system with a much more authoritarian system. Instead of a variety of bodies each having small amounts of sovereign power, we now have an overarching body with constitutional power to overrule dissent. Even as we write, there is uproar in the New Forest as a result of the head-on collision between the wishes of the NPA and of substantial groups of New Forest residents. In our view there should be an opportunity available to the people who live in the area covered by the NPA to choose and remove, directly, some of its members. As the consultation document seems to hint, the obvious choice for this process should be the members currently described as "Secretary of State Parish Members".</p>
New Forest District Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>New Forest District Council supports the idea of changing the current arrangements, and very much welcomes the concept of increasing local democratic input into these bodies. However, we are disappointed that the only proposal which seems to be suggested is to replace democratically elected parish or local authority members with directly elected members. Our authority has grave concerns about the introduction of direct elections here and in other Government proposals, for example the recent Green Paper on Policing. As acknowledged in your report these single purpose elections increase the risks of encouraging individuals with narrow personal goals.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p><i>Do you have any outstanding issues?</i></p>
Brockenhurst Parish Council	Issues of local representation.
Brockenhurst Parish Council	Strong support for the principle of direct elections without the need for larger authorities. Regardless of size all members of National Park Authorities should be directly elected or the majority directly elected. Those members

	<p>representing District or County Authorities should be reduced in number to be the same as those appointed to represent national interests. Directly elected members should then constitute a majority over non-elected members. No view on the Broads Authority question. Greater emphasis on directly elected members, the Code of Conduct must be changed to permit, indeed encourage, elected members to represent local interests and to allow those who are local to take part in the debate. At present these people who are local and know about local issues have to declare a prejudicial interest and take no part in the debate. If the Planning Committee decision is against the Parish Council, there is no right of appeal. But applicants/developers have this right. The composition of each Authority should adequately reflect the nature, local history, tradition and circumstance of each Park. Few parks are identical and one size will not fit all. The New Forest is very different from most Parks and if it is to remain a Park should be restructured to a tailor-made solution that recognises the very different land ownership arrangements and the New Forest Acts.</p>
Denny Lodge Parish Council	<p>Mentions that Authority's recent consultation on its management plan has created the atmosphere that it has too much power and that it is not in the hands of members who are directly elected. The option of creating additional directly elected positions would make local democratic arrangements more confusing and encourage candidates with narrow, possibly personal interests, rather than the wider interests of local council members. The cost of direct elections, and the likelihood of a small percentage of the electorate participating are also against this approach being taken. There is also the possibility that people living near to the New Forest but not within the National Park boundary would feel they have a right to be included in such elections, which would raise the question of where the line should be drawn. They consider that direct elections is not the obvious solution and instead propose a tailor made governance solution as argued when the New Forest was established to take into account the role of the existing statutory bodies.</p>
Godshill Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Members support the motion that directly elected members, ideally over 75% of the total number of members, is necessary and these should be persons living in the Authority area.</p>
Hale Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> The Council agrees in principle to direct elections as long as the costs are carefully governed. <i>Do you agree with direct elections resulting in larger authorities?</i> No the size of the authority should not be increased by direct elections. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> The county, district, parish and town council members are elected to their positions and so are expected to represent their constituents when serving as a member of a National Park. This section of the membership of the authority should remain. The Government appointees are the biggest section of the membership and it is a proportion/or all of these members that should be directly elected. Professional bodies in the area of the National Park should be encouraged to nominate suitably qualified people to stand for election. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> Yes, it would appear to make sense. <i>Do you have any outstanding issues?</i> The New Forest National Park Authority has just been through a consultation period with local authorities and the public. This Council received representations from Parishioners and other members of the public who nearly all stated that the membership of the National Park was unelected, did not represent the views of the people living in the Forest and appeared to know nothing about the New Forest. This would appear to indicate that many people would welcome direct elections.</p>
Ellingham, Harbridge and Ibsley Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> The New Forest National Park Authority is the newest of the National Parks and has yet to build the necessary close working relationships with District and County authorities of the longer established National Parks. The Council is concerned that direct elections would jeopardise these links developing and would result in a less joined-up approach to the common issues shared by the NPA and neighbouring authorities. The Council does not consider that the Scottish approach should be taken as a template for England. The NPA should not be a forum for Partly Politics and there is a risk that directly elected members would make it easier for this outcome to prevail. The interests of the National Park should override any political interest of the appointing bodies. <i>Do you agree with direct elections resulting in larger authorities?</i> <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> <i>Do you have any outstanding issues?</i></p>
Hordle Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> We disagree to the Principle of Direct Elections. <i>Do you agree with direct elections resulting in larger authorities?</i> Not applicable. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Not applicable. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> Not applicable. <i>Do you have any outstanding issues?</i> Not applicable.</p>
Milford on Sea Parish Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Opposed to the principle of Direct Elections to the National Park and Broads Authority. It believes that local, democratically elected members of the Parish and Town Councils should continue to have members of the Authorities, together with representatives from the District and County Councils. The Parish Council would like to see more local representatives on the English National Park and Broads Authorities. It would appear that the current system is working well and, as this system includes democratically elected representatives of the local community, why does it need to be changed? If Direct Elections are introduced there is a danger of individuals with their own agenda being elected and they may choose to follow that agenda rather than represent the views of the local community. <i>Do you agree with direct elections resulting in larger authorities?</i> No comments. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected</i></p>

	<p>members? No comments. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> No comments. <i>Do you have any outstanding issues?</i> No comments.</p>
Ringwood Town Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Supports the underlying principle of the need to change the current arrangements for appointment to these bodies for reasons of the democratic deficit. <i>Do you agree with direct elections resulting in larger authorities?</i> No comments. If authorities were to remain the same size, which members should be replaced in favour of directly elected members? Considers that all Members of the National Park Authority should be directly elected by residents living within the overall area of the particular National Park. The Council does not believe that it is essential or even beneficial to continue with nationally appointed, unmandated members to National Parks. The "national interest" referred to in the consultation document can be easily protected through legislation relating to the Authority's role. Your proposals would increase the democratic deficit rather than increase the democratic mandate. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> <i>Do you have any outstanding issues?</i> The Council knows that the public locally believes that the New Forest National Park Authority is out of touch with local needs. The publication of the body's Draft Recreation Strategy and its Management Plan have led to massive criticism, including public meetings, rallies and the formation of protest groups. The proposals within the documents are out of touch with the needs of the New Forest population and the views of elected politicians including the local MPs, County, District and Town Councillors, are not being heard. Much of the criticism levelled at the National Park Authority here could have been avoided if a tailor made constitution had been adopted for this area. Whilst not providing direct elections to the National Park Authority, it would have provided for a representative membership of a strategy co-ordinating body, that retained local accountability through existing local authorities continuing to carry out all of their statutory responsibilities within the Park. This would have recognised the unique circumstances of the New Forest, including the statutory protections, the range of existing management organisations, the location of the vast majority of the Park in one Local Authority area and the substantial population that lives within its boundaries. Instead a standard 1949 Act model was imposed and it is this which is creating widespread dissatisfaction.</p>
Sway Parish Council	<p>Very strongly support the concept of all Members of the New Forest National Park Authority, including the chairman being selected on the basis of direct elections. They can see no justification for increasing the size of the New Forest National Park Authority. The size of the New Forest National Park Authority can be capped at its current level by evicting all of the existing members. This is because they all hold their positions solely by virtue of patronage, and none of them have a legitimate democratic mandate. They have no opinion as to whether the Broads Authority should have Parish Members. The existing appointees serving on the New Forest National Park Authority have developed an essentially autocratic style, and have habitually riddled roughshod over the interests of people who live in the New Forest. Although they claim to consult widely, they appear to hear nothing which conflicts with their own preconceptions. The approach of the New Forest National Park Authority has on several occasions been described as "jackboot rule". In reply to your request for their proposals, Sway Parish Councillors consider that decisions which have the potential to have a devastating impact on their lives should be made by people fully accountable to their electorate, and who are exposed to the disciplines inherent in a fully democratic system of government. Important amongst these is the ability to vote out anyone who fails to advance the essential interests of the people who live in the New Forest.</p>
The Friends of Brockenhurst	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> It would seem that if there were going to be an elected body for NPAs then it would better to have fully elected authorities so that they can be held directly to account by the public. The general feeling is that this is simple, clear-cut and totally above board. If the authority were to be partially elected, then the obvious candidates would be the appointed members, with the corresponding loss of breath of interest and expertise. There is, however, some feeling that the parish representatives would be good candidates for election because of their (hopefully) in-depth local knowledge. <i>Do you agree with direct elections resulting in larger authorities?</i> We would have thought that a much larger authority would prove unnecessary and probably somewhat unwieldy to operate. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> <i>Do you have any outstanding issues?</i> To conclude we feel that a completely directly elected authority would be preferable so that the authority is fully accountable to its electorate.</p>
Sheffield Hallam University	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> 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 co-ordinating 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. <i>Do you agree with direct elections resulting in larger authorities?</i> 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. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> N/A <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> N/A <i>Do you have any outstanding issues?</i></p>

	<p>It is not possible to consider the issue of direct elections in the absence of any discussion of the role and function of 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 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 was carried out in 2002. There is a need for some debate on how NPAs can effectively integrate policies for 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.</p>
Local Respondent	Strongly support the direct elections of National Park Authorities by local residents.
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> I fully support the principle of Direct Elections. I agree to direct elections of all members to a National Park Authority. This is probably the best way to ensure a diverse and healthy membership even if it results in a larger authority. If direct elections are to be implemented then a rule should apply that no person should be elected if they are members of more than 2/3 other local committees/authorities/bodies etc to ensure there are no conflicts of interest.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> If authorities were to remain the same size I would prefer to see the Chairperson and Deputy Chairperson to be democratically elected by the local electorate.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> I have no experience or knowledge of the Broads, so decline to comment.</p> <p><i>Do you have any outstanding issues?</i> The New Forest NPA is currently unelected although one can argue that as some local Ward and/or Parish Councillors are on the committee, their Parish already elects them. This is perfectly true but they were elected for a very different purpose and 'wearing 2 hats' has been a contentious point whereby the NPA (unelected) Chairman has instructed these members to put the Authority's business first. Without a democratically elected authority, the people of the New Forest have been denied the opportunity to discuss the NFNPA's current consultation document in an open and transparent environment. Instead, the authority has relied on a series of workshops with local and regional organisations to represent the general public. These workshops had a very poor attendance of just over 33%. Unless one is a member of these organisations, or belongs to a pressure group focusing on one aspect of these plans, there is no mechanism in place to gather the view of the general public.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Issues over whom should be elected. I would not support the "principle" of direct elections by local groups.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> Should the principle of "elected members" be chosen then elected members should directly replace current unelected Parish members resulting in no net increase. I imagine a NPA election would have to be mounted at the same time as other local elections to be practical and I wonder given existing local authority turnout if this would be realistic and practicable. If elected members were deemed to be worth considering then Parish Councils and Local Authorities should perhaps be given the option to choose whether existing representatives should be selected directly or indirectly with the relevant local authorities bearing the cost of a decision to choose directly elected representatives.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> As above, replace Parish members only.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> No comment.</p> <p><i>Do you have any outstanding issues?</i> Planning policy at national and therefore local government level is already failing badly to protect what little of our natural environment still remains, as evidenced by the continued destruction of ancient woodland and meadows that have some level of biodiversity. A recent parliamentary committee confirmed that planning policy is the major contributor to this destruction. The point is that all decisions are made to satisfy people and not sustainable policies. MPs and local councillors under pressure from local electorates and business in particular are mainly dismissive of the natural world and view it as disposable in the so called pursuit of human development. Present government policies on wildlife are unsustainable and these must be strengthened in the remit of the National Parks and in the wider countryside and in urban areas and spaces as well. If the government were to strengthen biodiversity protection policies and bring policies more in line between the NPAs and local authorities then the arguments of many of the objectors to indirectly elected bodies would be dissipated.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Fully support the principle of direct elections.</p>
Local Respondent	<p>I agree to the principle of directly elected members, even if this were to make the authorities bigger. I believe that Parish members would still have an important role, representing their communities. Elected members are likely to come from interest groups not currently represented on the authorities- for example in the case of the New Forest, the New Forest Equestrian Association and the New Forest Dog Owners Groups might well put forward a candidate for direct election. In this way, the authorities are more likely to represent all the stakeholders in a National Park.</p>
Local Respondent	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> I agree with the principle of direct elections. I think that 50% of each and every NPA board should be elected.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> No, currently the New Forest Authority has some 25 members and events have shown that it is unwieldy and seems to have been unable to effectively guide its civil servants. The result has been a sad debacle. I would have thought that any authority to be effective should be restricted to workable size, say fifteen, and the effect of democracy is that the authority needs fewer 'appointees' to represent diverse views.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> Currently there seems to be a plethora of appointed 'elected members' in the New Forest Authority representing various tiers of local government. As they have not been elected to the authority, it is unclear whose views they put forward. They tend to represent the views of their respective committees rather than the people who will be</p>

	<p>bearing the costs (financial) and burdens of any decisions. I can see no difficulty with local/parish county and other councillors also standing for the proposed authority elections, but their responsibilities will be different. The issue is that currently local people affected by authority decisions cannot approve or decry controversial decisions at the ballot box, and as a result, find it difficult to insure that decisions made reflect local concerns.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>This issue does not apply to me in Hampshire.</p> <p><i>Do you have any outstanding issues?</i></p> <p>The current furore in the New Forest National Park offers a curious insight into the problem of unelected bodies.</p>
Local Respondent	<p>I agree wholeheartedly with the principle of direct elections – I only have experience with the New Forest National Park and as someone who was born and bred with the boundaries and still lives there now 60 years on. I find them to be very out of touch with local people (and most everyone else for that matter). The people on their consultative group seem to be very strangely selected, i.e. a neighbour of mine and incomer who has very little local knowledge but does allow Scouts to camp in his garden is on whereas the local New Forest Pony Breeding and Cattle Society who have a great deal to do with the open New Forest and its semi feral stock have never been consulted first or last and considering how much the NPA are “supporting” the semi feral stock is odd. The NFNPA are at odds with everyone including the County Council and the vast majority of local people, yet seem happy enough to carry on regardless on the grounds that they know better than anyone else. Their policies regarding land use for instance are to be policed by encouraging neighbours to turn on each other – seems a bit like the STASTI to me and not a recipe for long-term happiness in any area I would think. Far better they have policies that people feel they can go along with, introducing changes gradually, I would have thought but the NFNPA seem not to care and they appear to be answerable only to themselves and God. Supports larger authority if it is unavoidable – I know only too well that the bigger the committee the slower the progress.</p>
Local Respondent	<p>Extends her who-hearted support to the idea of having elections for members of the NPAs. I would, however, extend this to include all members so that the body is truly accountable. There is no doubt in my mind that the residents (and in particular horse keepers) of the New Forest would not have been put through the pain and anxiety of the last few months had the NF NPA been elected. Those currently in office have no regard whatsoever for the people they are meant to be serving.</p>

The principle of direct elections was partly supported by two MPs, the local authorities, half of the parish councils, and many individuals. But some of the parish councils opposed this concept because it would jeopardise the links between the parish councils and the National Park Authority. They pointed out that the National Park Authority, being a new park, still has to develop effective working relationships between itself and its stakeholders. Most stakeholders were opposed to the idea of larger authorities, but with some parishes and individuals expressing the view that they were happy to have larger authorities in order to promote direct elections. The main reason behind direct elections was to promote democratic legitimacy and local representation and some stakeholders wanted all the members on the National Park Authority to be directly elected. The local labour party representative suggested that the method by which Parish Members are selected locally for recommendation to the Secretary of State could have some guidance to make it open and fit for purpose to get the right people. A few Parish Chairmen seem to hold a lot of sway in these recommendations. Concerns were expressed by a number of stakeholders of single issue candidates and increasing politicisation and the costs of holding direct elections. Nevertheless, there was a strong opinion within the New Forest that the National Park Authority has too much power and generally ignores the interests of local communities.

## Northumberland

Respondent:	Comments:
Northumberland National Park Authority	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>The Authority supports the principle of local democratic accountability. The Authority does not, however, feel that there is a democratic deficit in National Park Authorities. It is not clear how direct elections would enhance democratic accountability or the delivery of national park purposes. The Authority sees no reason to support the introduction of direct elections at this time.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>The authority believes that it should neither be increased or reduced in size.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>If direct elections were to be introduced, the Authority would highlight the particular situation in Northumberland National Park with a resident population of only 1,936 (2001 Census). If the membership changes set out in the Consultation on Revised Membership Arrangements are enacted, the Authority feels it would be logical for the two Secretary of State appointees who “live or work in the National Park” to become the only two positions which are directly elected to the Authority.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>Whilst not directly impacting on Northumberland National Park, the Authority wishes to point out that based on experience in Northumberland parish members are a valuable part of the overall NPA membership. Parish members bring a unique insight to issues affecting local communities, and in doing so enhance the overall balance and operation of the NPA.</p> <p><i>Do you have any outstanding issues?</i></p> <p>The Authority feels that the costs of holding direct elections, if introduced, should not be met from the existing National Park Authority budgets.</p>
Northumberland Country Council	<p>The Department’s proposals are acceptable to the Council. The Council express its support for two people directly elected from those who are on the electoral role in the National Park; and in other respects, the Department’s proposals are acceptable to the Council.</p>
Northumberland Association of Local Councils	<p>We are not persuaded that there is a case for direct elections. One of the strengths of our NPA derives from the mix of colleges from which the members are drawn. It is difficult to think how a handful of directly-elected members could engage with their constituencies on a regular basis, and it would be unacceptable for this ‘engagement’ to be nothing more than some electoral canvassing one every 4 years. We feel that 22 is a large enough membership for the Northumberland NPA. We note from the consultation document that parish members</p>

	in NPAs are making a very important contribution to their NPAs due to their close connections with local communities and voluntary groups; something which would be potentially lost if the Scottish model were adopted. Although we have no right to venture opinions about the Norfolk Broads, we were surprised and disappointed to read that there is currently no provision for parish representation.
Harbottle Parish Council	Favours arrangements which give more influence to people living and working within the Park. In the past this has been achieved by having members drawn from local authorities and from parish councils, though the latest proposals for Northumberland dilute that by increasing the number of Ministry appointees. Directly elected members could have a beneficial effect, provided that the electorate and the candidates live or work locally, because they would have an understanding of the issues and would have the interests of local people at heart. If on the other hand the electorate and candidates were to come from urban Tyneside or even wider area then the effect would almost certainly be damaging. It considers it essential that those who live and work within the Park should be strongly represented to ensure that the Park is treated as an active community not as a mere playground or museum for urban visitors. In popular opinion there is, rightly or wrongly, a widely held view that the Northumberland National Park is managed largely by unelected persons for the benefit of outsiders and to the detriment of people residing and trying to make their living within the Park. The Park Authority would have greater legitimacy if a proportion of Members were directly elected from within the Park.

The principle of direct elections received partial support with most stakeholders indicating their preference for the status quo. As the National Park Authority does not consider that there is a democratic deficit and is not clear how direct elections would enhance democratic accountability or the delivery of national park purposes, it does not support the concept of direct elections. The County Council is generally supportive of the Department's proposals and expresses its support for two people directly elected from those who are on the electoral role in the National Park. The Northumberland Association of Local Councils are not persuaded that there is a case for direct elections. They consider that it is difficult to think how a handful of directly-elected members could engage with their constituencies on a regular basis and express concern over the loss of parish members in NPAs who are making a very important contribution to their NPAs due to their close connections with local communities and voluntary groups; something which would be potentially lost of the Scottish model were to be adopted. A parish council supports arrangements which give more influence to people living and working within the Park. It considers it essential that those who live and work within the Park should be strongly represented to ensure that the Park is treated as an active community not as a mere playground or museum for urban visitors. And also in popular opinion there, is rightly or wrongly, a widely held view that the Northumberland National Park is managed largely by unelected persons for the benefit of outsiders and to the detriment of people residing and trying to make their living within the Park. And that the Park Authority would have greater legitimacy if a proportion of Members were directly elected from within the Park.

## North York Moors

Respondent:	Comments:
North York Moors National Park Authority	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>The Authority fully understands the importance and value of Direct Elections in general, but in practice it does not see significant value in them for National Park Authorities because: (i) the great majority (16 out of 22) of NPA members have been elected in some form already; (ii) there is no fundamental democratic deficit; (iii) the current system works well; (iv) the are practical difficulties in organising elections on entirely new Ward boundaries; and (v) the cost of running the elections would be significant and that money could be better spent on other public services. Members noted that the issue of Direct Elections did not appear to be a major issue in this area.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>The Authority believes that recent reductions in membership mean that it has as small a membership as is compatible with the current role and remuneration of its members. An increase in size is not needed, however, and since the Authority does not see merit in introducing Direct Elections this question is immaterial. A substantial increase in the size of the Authority would not be welcome.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>It is partly because of the difficulty of answering this question, in a situation where the current arrangements work well, that the Authority does not favour the introduction of directly elected members. The Members appointed by the principal local authorities form the biggest single component of the membership of the Authority, but all parties see the links to these bodies as essential to the effective functioning of the Authority. The national members make up only 27% of the Authority which is not a large proportion given the national status of National Parks and the 100% national funding. The Parish members are "closest to the ground" and might be considered the nearest equivalent to directly elected members, but again all parties are agreed that links to Parish Councils are essential. The Parish members of this Authority have served the Authority well. It should be emphasised that distinctions between these category of member tend to be and should be irrelevant as they are all members of one team.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>This Authority is not in a position to comment on the position in the Broads.</p> <p><i>Do you have any outstanding issues?</i></p> <p>No. – Parish Forums – (approximately 60 residents). After discussion, no resident spoke in favour of Direct Elections and expressed satisfaction at the Authority's position.</p>
North Yorkshire County Council	Does not support the principle of Direct Elections to National Park Authorities because the current system for appointments to the NPA works well and there is no evidence of a wish for change from people or organisations within or without the National Parks. Direct elections to NPAs would: (a) introduce further confusion in the minds of the public as to the roles and responsibilities of elected councillors (in North Yorkshire we already have elected county, district and parish councillors); (b) potentially damage the existing synergy between the NPAs and NYCC that comes in part from sharing elected members; (c) not result in any measurable impact on the quality of decision making; (d) be an unnecessary additional cost.
The Association of North Yorkshire	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>It does not support the principle of direct elections to National Park Authorities. Association members believe that</p>

Councils	<p>the current system for appointing to the National Park Authorities works well and that there is no evidence of a wish to change. The Association comprises senior elected Members from North Yorkshire County Council, the City of York Council and each of the seven District Councils in North Yorkshire.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p><i>Do you have any outstanding issues?</i></p>
Cloughton Parish Council	<p>Considers the present system for the North York moors National Park effective. There is a good variety of members, no party politics and no single group or person dominates. This Council does not support the principle of direct elections. It is vital the numbers of parish members is not eroded.</p>
Local Respondent	<p>I think that direct elections are essential in order to give legitimacy to the decisions of national park authority members and to improve accountability to residents of the national park. I do not agree with decisions resulting in larger committees, which would be less effective as decision making bodies. Directly elected members from the local community should have more decision making power than at present, therefore, I wish to see less local county council and national members. I would not want members necessarily to be tied to local or parish councils – independent members would better reflect the interest of the groups of people living in the national park. I have no opinion on governance of the Broads. I think that far too much emphasis is placed upon preserving the unique landscape of the moors, but forgetting that much of it was made by local farming families who have been neglected and ignored for many years – hence the deterioration in population, facilities, heather moorland, flocks of sheep. A better balance could be struck between satisfying the needs of those who live and work in the national parks and tourists. Finally, as a resident of the north York moors National Park, whose family has lived here for more than 100 years, I feel that our authority has a poor reputation in its dealings with us, particularly as regards planning.</p>
Local Respondent	<p>I see no need for a change in the way appointees are made. To hold elections would be costly, probably not widely responded to and candidates little known to the electors. I see little point in change for change sake but the government does like to meddle and control.</p>
Local Respondent	<p>Supports directly elected members. All members should be directly elected. The stating position for any consultation of the issue should be that all members should be directly elected. I find it rather unattractive that the published letter from the chief executive appears to support the unsurprising views of the present members to keep the position as it is. There is no explanation as to why the members can justify not having to be directly elected, in contrast to other similar bodies (e.g. local and county councils).</p>

The principle of direct elections was only supported by two individuals. All other stakeholders were opposed on the grounds the current system works well. The National Park Authority considers that there is no democratic deficit and that there are practical and financial difficulties in organising elections. The County Council considers that direct elections would (a) introduce further confusion in the minds of the public as to the roles and responsibilities of elected councillors (in North Yorkshire we already have elected county, district and parish councillors); (b) potentially damage the existing synergy between the NPAs and NYCC that comes in part from sharing elected members; (c) not result in any measurable impact on the quality of decision making; and (d) be an unnecessary additional cost. A parish council mentioned that there is a good variety of members, no party politics and no single group or person dominates. The two individuals raised the issue of democratic legitimacy and local representation as the main basis for justifying direct elections. No one wanted larger Authorities.

### Peak District:

Respondent:	Comments:
Tom Levitt MP High Peak	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>I both disagree and object to the use of direct elections in appointments to boards of National Park Authorities. In arguing for the status quo, questions 2 to 4 fall as they are no longer relevant.</p> <p>In principle, the narrower the remit of a public body, the less justified is the use of direct elections. Local authorities – which exist within High Peak at parish, district and county level – have a wider variety of activities, functions and responsibilities than do National Park Authorities. Whilst not wishing to belittle the importance of planning, economic and community development, tourism and the maintenance of the landscape, it could not be said that National Park Authorities have a comparable breath of responsibility. If they did, then the argument ought to be whether every member of a National Park Authority ought to be directly elected or none. The current system, where a sizeable proportion of members are directly elected to constituent authorities but no one is elected to the National Park Board itself, gets the balance right. A hybrid authority, part elected and part not, would lead to a conflict and division – especially where elected members were united on a particular issue but overruled by the non-elected majority.</p> <p>In recent years the scrutiny powers of local authorities have developed and matured. I believe that local authorities in Derbyshire have a good relationship, generally, with the Peak District National Park. There is no reason why some of the scrutiny capacity of those authorities should not be directed at areas where there is a common interest between a local authority and the National Park, such as economic development or transport. It may be that a scrutiny partnership at appropriate level can benefit the National Park Authority by increasing the capacity for scrutiny in a cost effective manner.</p> <p>Planning is a major role of the National Park Authority. Outside the national park this role is carried out by the District Councils using arguably less rigid guidelines; this acknowledges the special status of National Parks. There is an argument that elected councillors are not needed for making good planning decisions. Planning law, planning guidance, and (councillor-led) local planning policies actually give planning committees limited discretion as to how they exercise their judgement. “Political” decisions on specific planning applications are not allowed and planning authorities have to demonstrate that they are acting reasonably at all times.</p> <p>I do not argue that Councillors on local authorities should lose their role in local planning. However, the recent Planning Bill acknowledges this argument in its proposals for major capital projects. The law now acknowledges</p>

	<p>that in some planning decisions the final verdict need not be taken by directly elected councillors. This reinforces my view that indirectly elected and appointed members of a planning authority, such as we find in National Parks, can carry out the planning role perfectly adequately.</p> <p>I believe it is very important that national parks retain their national responsibilities. Whilst this should not be exercised at the expense of local interests, it is important that the balance is kept and national responsibilities are not diminished. Logically, therefore, if there is an argument for electing local representatives there would be an argument for electing national ones too. This would make the system cumbersome, dilute and raise many more problems about the nature of the franchise. It is for these reasons that I oppose direct elections to National Park Authorities whether as local or national representatives and I argue in favour of the status quo.</p>
Peak District National Park Authority	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Direct elections to appoint members who are currently appointed by the Secretary of State are unwelcome in principle because the national interest must be properly reflected by people of expertise and experience in the makeup of National Park Authorities. Impractical because it would be inordinately expensive and politically unwelcome to hold a national election. Direct elections to appoint members currently appointed by councils is unwelcome because it would break the link with councils with whom NPAs work closely and need to work increasingly closely with. Impractical because it would duplicate the election of members already elected by popular vote to councils and because it would be impossible to decide what boundaries would apply to the constituency of electors. Direct elections to appoint members who are currently appointed by ballot of parish councils are unwelcome because it would break the link with parish councils and meetings with whom NPAs work closely and need to work increasingly closely with. Impractical because it would be a more expensive way of giving the resident communities the opportunity to appoint people currently elected to parish councils and then by parishes to the National Park Authority.</p> <p>The National Park Authority is committed to working with communities and with partners to encourage full participation in their activities by all sectors of the community. By community, we mean residents, visitors, people who work in the National Park and people whose lives are affected by our decisions. We want to reach out to harder to reach groups, such as younger people, and conduct our business in an open and transparent way. We believe that there are many ways of strengthening the relationship between the Authority and these communities that would be a priority over the costs of introducing direct elections.</p> <p>The Authority has no view on the makeup of the Broads Authority. However, it wishes to express a positive view on the experience to date of parish members in this Authority. Members feel that members from parish councils and parish meetings bring a practical understanding of community life in the National Park; they bring a challenge to nationally driven agendas which helps the practicability of policy; and they strengthen the link between the Authority and the communities who live in the National Park.</p>
Derbyshire County Council	Opposed to the principle of direct elections if applied to local authority members on two counts: (a) break the vital link between the councils/national park; (b) it was not necessary because the council representatives are already elected.
Cheshire East	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Sees no reason to change the present arrangements regarding representation on the Boards of National Parks and consequently objects to any proposal that would result in direct elections to the National Parks. Will continue to press for the continuation of representation in Cheshire East at the present level of two Members of the Peak District National Park Authority after the changes to local government in April 2009, to continue to ensure adequate representation of people in Cheshire and the North West Region, and to ensure that the current total membership of the Board is not reduced.</p>
High Peak Borough Council	Has resolved not to support the principle of direct elections to the National Park Authorities and would wish the status quo to remain. In coming to this decision, members considered that those appointed by local authorities to National Park Authorities have already faced the electorate by being elected to a local authority.
Kirkless Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Concerned with both the principle of direct elections and the practical implications of such elections. The introduction of direct elections could disenfranchise the local authority members and weaken the link between the council and the NPA. Council representatives already have the required legitimacy and democratic mandate. Difficult to administer practically.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i> Not supportive of any increase in size as a result of any decision to introduce directly elected members.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> It would be impractical to replace any other members except existing parish members with directly elected members. However, as stated above, we do not consider that the case for how this would improve the effectiveness of local representation has been well made.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> No comment on this question.</p> <p><i>Do you have any outstanding issues?</i> None.</p>
ESU Manager Borough of Macclesfield	Macclesfield Borough Council sees no reason to change the present arrangements regarding representation on the Board of National Parks, and consequently objects to any proposal that would result in direct elections to the National Parks. That Macclesfield Borough Council continues to press for the continuation of representation in Cheshire East at the present level of two members of the Peak District National Park Authority after the changes to local government in April 2009, to continue to ensure adequate representation of people in Cheshire and the North West Region, and to ensure that the current total membership of the Board is not reduced.
Derbyshire District Council	This Council is against the principle of direct elections to National Park Authorities. We believe that the local authority and parish members who represent our District on the Peak District National Park Authority have, over the years, built up an unique and invaluable expertise of National Park affairs and this has enabled them to represent, albeit in an indirectly elected capacity, the wishes of communities whose work and lives impact on, and are affected by, the Park. Therefore, we see no reason for changing a system that we feel already works well in its current format.
Ryedale District Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> Direct elections would bring little or no additional benefit over the existing arrangements. Local authority members serving on the Park Authority have been appointed from those living within the national park as well outside its boundaries. This has helped the Authority to understand issues (including particularly housing and</p>

	<p>socio-economic development) from the wider North Yorkshire perspective as well as from the position of communities within the national park. The Park Authority also derives benefit from having members who serve in influential positions in their appointing authority, thus ensuring that national park issues are understood by those making decisions in those authorities. If there were to be directly elected Members to the National Park Authorities, the likelihood would be that they would replace the parish and local authority members. Direct elections at the expense of any of the existing representation from local authorities would inevitably weaken the links between the Park Authority and those bodies, which in turn would result in a less joined-up approach to the common issues faced by each Local Authority in addressing the needs of the national park and its communities. The introduction of directly elected members could give rise to a fragmentation in local representation caused by a growth in "single issue" or "single community" biased members who would stand on a platform of support or opposition to particular policies rather than the overall interests of the national park or its communities as a whole. The National Park Authority has never operated on the basis of party politics because of the diversity of sources of membership, and Members usually make good use of the skills they share as a body. There is a risk that the introduction of directly elected members would give rise to the introduction of party politics.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>Governance arrangements for the North York Moors National Park Authority work well under current arrangements and do not support any increase in its size as a result of any decision to introduce directly elected members.</p> <p><i>If Authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>The North York Moors National Park Authority has benefited from the present system of appointing a proportion of "national" Secretary of State members. The handful of Secretary of State non-parish appointees are selected for their specialist interests to represent the National or wider mandate. They usually bring in expertise that is useful and would not necessarily be available otherwise. It is important that the national significance of the national park should be reflected in the membership and the Ryedale District Council would not wish the National Park to lose its Secretary of State members to enable the introduction of directly elected members. The Park Authority works together with three district councils, North Yorkshire County Council and one unitary council in delivering the services for which it responsible and in contributing to the joined up delivery of services throughout the Local Area Agreements and the relevant Strategic Partnerships. These relationships are essential to enable the Park Authority to fulfil its statutory purposes and particularly relevant to its duty to foster the economic, social and environmental well-being of local communities within the national park. For this reason the Ryedale District Council would not support any proposal for the Park Authority to lose local authority members to enable the introduction of directly elected members.</p> <p>Replacing existing parish members with directly elected members could result in an authority membership less representative of local communities than at present. The parish members act as a satellite for the whole parish council system giving it a sense of recognition and influence on the park. The same goes for members of the constituent authorities who provide a link with the provision of other local service mandates in the area of the Park.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>Does not wish to comment on this question.</p> <p><i>Do you have any outstanding issues?</i></p> <p>The perceived "democratic deficit" would not be addressed by the introduction of a small number of directly elected members. Arguably the introduction of direct elections could result in a less representative authority. Increasing the number of directly elected members at the cost of representation from local authorities would reduce the capacity of the Park Authority, which, as presently constituted is able to "punch its weight" as a result of working in partnership with others. Parish members were introduced by the Environment Act 1995 to promote more local accountability in national park authorities. The existing system has a good track record at community level and the involvement of parish council members is helpful to the Park Authority.</p>
Derbyshire Association of Local Councils	No change was necessary to the current Parish Council representation system and therefore would disagree with the principle of directly elected Parish Council Members, but if any change was to be made a system should be found to allow greater representation by those living within a National Park.
Curbar Parish Council	Against any consultations which sought to reduce the numbers of Parish Members on the Peak National Park Authority, and in fact believe they should be increased to from 20% to 25%. You raise the issue of directly elected members to be appointed for interested purposes: there are already eight such members on the Peak National Park Authority, appointed for this same purpose for which they receive pay; and yet we are of the understanding, that there is no threat to their membership representation.
Eyam Parish Council	Eyam Parish Council agrees with the principle of direct elections to National Park and Broads Authorities (County, District and Unitary) and not those appointed either from Parish Councils or from elsewhere by the Secretary of State. It is of the view that local accountability is important. It proposes that candidates for election to National Park Authorities should either: 1. Live within the area of the National Park; 2. Live within six miles of the boundary of the National Park; 3. Be able to demonstrate that they are employed or conduct their principle business from premises located within the National Park.
Peak Park Parishes Forum	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>We disagree with the principle of direct elections if only applied to a proportion of members.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>We do not agree that direct elections should result in larger authorities. However, the size of authority should reflect its ability to have an adequate number of members to act as its ambassadors to fulfil the responsibilities entrusted to them, and to represent the broad spectrum of interests expected of the Board within the current legislative requirements.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>All, or none.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>Yes; All English National Parks should have a consistency of representation, including parish members.</p> <p><i>Do you have any outstanding issues?</i></p> <p>We believe there should be an adequate and effective annual appraisal process for all Board members to ensure they are properly trained and prepared to uphold the highest standards of public office in fulfilling their remit.</p>

Friends of the Peak District	<p>We disagree with the principle of direct elections to National Park Authorities. We think the current arrangements for determining the membership of the National Park Authorities are satisfactory and that direct elections would in all likelihood impair the working of the authorities by introducing party politics to their deliberations. We do not think that National Park authorities should become larger. We do not think any member should be replaced in favour of directly elected members. Having some members directly elected and others appointed may lead to the elected members being seen or seeing themselves as more legitimacy, which may at times impair the functioning of the authority. The secretary of state national appointments are important in adding a national dimension to the debate within the authority, and because of the opportunity their appointments provide to fill any gaps in personal qualities, experience or background. They should remain as a key part of the authority membership, but it is clearly impractical for national elections to be used as the method for their selection. The perceived lack of public accountability of authority members by the residents who are affected by their decisions can be a problem, but can be addressed in other ways. Residents need to know how their representatives are on the authority and how to contact them, with all authority members being encouraged to make themselves more available. It is vitally important that National Park Authorities are able to further National Park purposes by working partnership with local authorities and district and parish councils. Changes to the membership of the authorities, such that local authorities and parish representation were lost, could very well be detrimental to this.</p>
Sheldon Parish Meeting	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>  We agree with the principle of Direct Elections. As the consultation document remarks "those who are democratically elected have a legitimacy which no appointee can ever have". We support elections as an integral part of democracy both national and local. It's the democratic process which is precious to us all. We believe that it is the only way that in future the governance of National Parks will have sufficient credibility to survive for the nation and for their residents. This could also be a welcome mechanism to allow wider and more geographically significant representation by those living within the National Park on the National Park Authority. If direct elections were introduced candidates would need to demonstrate a local connection with local communities (such as living or working within the Park) to be eligible.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i>  If authorities were to remain the same size, which members should be replaced in favour of directly elected members?  No we do not believe the Authorities should be larger than they currently are.  If authorities were to remain the same size, which Members should be replaced in favour of directly elected members?  We believe that National Parks should be representative of the widest possible interests. We believe the national Membership appointment process should be considered as part of this consultation to ensure complete balance. In any case this is not a reason why some form direct election would not be possible for locally appointed members, as is currently the process for parish members in England and directly elected members in Scotland. The election of national members need not to be national but local to the relevant NP.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i>  The Broads, like the National Parks should have Parish Members to represent the local community interests.  <i>Do you have any outstanding issues?</i>  The issue of equal Membership of Councillors living outside the Park in constituent Councils who only have a small impact on population needs to be considered and revised. It should be noted that at least in the PDNP, and probably elsewhere, Councillors serving on the NP representing one type of Council tend also to be representatives of another Council tier. The District or Borough Councillors may also be Members of the County Council and this could be taken into account with respect to balance and the matter of how to evolve a principle of some form of direct elections. Perhaps some form of joint membership might give space for more directly appointed local members.</p> <p>What is vital is that local people feel they are empowered by some democratic means to have a more direct say in how the Authority is run. There is also sometimes an argument advanced by some that since there are 2 million people living in the immediate areas outside by surrounding the National Park and only 38,000 inside it, residents are in the minority and should not have the majority say. This is not a valid argument given the nature of local resident importance to conservation and preservation of the National Park over the centuries and now and completely misunderstands the importance of local (and national) accountability.</p> <p>Planning issues, seen by local communities as very important and sometimes contentious in the decision making process at Committee, would be better served by an increase in wider spread local representation on the National Parks.</p>
Local Respondent	<p>Resident of the Derbyshire village of Parwich, which falls within the boundaries of the Peak District National Park, I help to administer our village website/community weblog. In order to gauge local opinion to this issue, a simple online poll was posted to the site on Thursday October 16. As of today (Monday October 27) we have received around 50 set of responses to our three questions. Only 10% of respondents believe that the Peak District National Park Authority adequately represents the views and needs of its residents. 88% of respondents favour the introduction of directly elected members onto the PDNPA's board.</p>
Local Respondent	<p>The principle of the local element of National Park members being directly elected is strongly supported. I believe this should be a majority of members of the Authority. Over 90% of the population of the National Park lives in Derbyshire and Staffordshire yet only five of the 30 members of the Authority appointed by local government actually live in the National Park. The others represent and usually live in primarily urban areas surrounding the National Park. There is virtually no commonality of interest between local people and those that sit on the National Park Authority and make decisions that affect, to a much greater degree than normal, their lives. Issues of democratic accountability. The Peak District National Park Authority is too large as it is. A directly elected local authority element would dispense with the need for the parish representatives. The obvious size would be 18 to 24 members, one third to be appointed by the Secretary of State.</p> <p>If direct elections are not to proceed, some alternative means is required to promote greater ownership of the National Park locally than exists. The present "at least one member per local authority" is wholly unjustifiable and appointments are made which clearly show no link whatsoever between the appointee and the National Park population. The status quo should not be an option.</p>
Local Respondent	<p>I support the concept of direct elections to National Parks. Parish members are a great success story across all the National Parks, reflecting the resident voice across the whole of the National Park. That principle should be extended to all membership which should be locally resident as possible. Resident Parish members are a vital part of the work of the National Parks and their role should be extended to include a wider resident representation. It is a question of geographic knowledge. The Scottish model, which the annex describes on p.6 under the paragraph the electorate is working well and has shown it is entirely feasible to operate direct elections</p>

	for those local government electors within the Park boundary. I strongly support the principle of direct elections which already exist in our Parish Membership. National Parks have important Local Authority functions, particularly planning ones and therefore need to have the credibility of local authorities which direct elections bring. I do not believe the Authority numbers should increase. I believe that the Broads should have Parish members directly elected as all other Parish members are. All members should be subject to direct elections. National Parks have many of the powers of local councils, but without any formal accountability; they therefore need a democratically directly elected membership to ensure they are accountable to residents and those who use the facilities the National Parks have to offer.
Local Respondent	Views on the consultation process itself and local representation.

The principle of direct elections was only supported by two parish councils and three individuals. The Local MP considered that the narrower the remit of a public body, the less justified the use of direct elections. He pointed out that a hybrid authority (part elected and part not), would lead to a conflict and division; in recent years the scrutiny powers of local authorities have generally developed and matured; local authorities in Derbyshire generally have a good relationship with the Peak District National Park; considers that indirectly elected and appointed members of a planning authority, such as we find in National Parks, can carry out the planning role adequately; and importantly that national parks retain their national responsibilities whilst maintaining a balance between local and national responsibilities. The National Park Authority echoes those views and adds that direct elections would break the link with local authorities and parish councils whom NPAs work closely and need to work increasingly closely with; duplicate the election of members already elected by popular vote to councils; and impossible to decide which boundaries would apply to the constituency of electors; and a more expensive way of giving the resident communities the opportunity to appoint people currently elected to parish councils and then by parishes to the National Park Authorities. Other stakeholders raise similar views and additional ones relating to party politics and the growth of "single issue" biased members of opposition to policies rather than the overall interest of the National Park or its communities as a whole; and that the Park benefits from national members. The overall effect of direct elections could result in a less representative authority membership. However, there is support for more local representation from the individuals and the local population.

## Yorkshire National Park Authority

Respondent:	Comments:
Miss Anne McIntosh MP Vale of York	It would seem that members are generally supportive of the current arrangements and believe also that they have served the local community and Park Authority well. A local point of view is essential to help determine the best solution for decisions that can be found. I agree with the conclusions of the Broads Authority Bill Committee that there is a lack of democratic accountability and therefore, as stated in paragraph 10, I too believe that "the Broads Authority and local people would benefit from the provision for direct elections to the Authority with a view to ensuring that the principle of direct representation of local community interests should be guaranteed. This would ensure that the Authority could be held to account and that there was a democratic means of moderating the powers enacted within the Bill".
Yorkshire Dales National Park Authority.	<i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i> The NPA would object to the principle of direct elections. Any change would not lead to any improvement in the effectiveness and efficiency of the National Park Authority? <i>Do you agree with direct elections resulting in larger authorities?</i> The size of the National Park Authority's membership was considered during the Review of English National Park Authorities in 2002. Consequently, the English National Parks were reduced in size. In our case this meant a reduction from 26 members to 22 members. It is the view of the National Park Authority that 22 members remains appropriate in order to carry the duties and responsibilities of the National Park Authority. The 'mix' of members together with the expertise and experience they bring to the National Park Authority has provided to be extremely beneficial. <i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i> This matter has been dealt with in question 1. <i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i> We have no view on this matter. <i>Do you have any outstanding issues?</i> In addition to the above comments we would make the point that , the role of National Park Authorities in national, regional and local matters means that its membership must reflect considerations wider than those simply within the border or an individual national park. The current 'mix' of members ensure that these wider considerations are taken into account in the delivery of the National Park Authority's two statutory purposes and its wider sustainable development role. In addition, the breath and experience of the membership also ensures that the National Park Authority can play a wider role in the development of the National Park on a national regional and local stage. We believe that this is critical to the well being of the National Park and its resident population.
North Yorkshire County Council	Does not support the principle of Direct Elections to National Park Authorities because the current system for appointments to the NPA works well and there is no evidence of a wish for change from people or organisations within or without the National Parks. Direct elections to NPAs would: (a) introduce further confusion in the minds of the public as to the roles and responsibilities of elected councillors (in North Yorkshire we already have elected county, district and parish councillors); (b) potentially damage the existing synergy between the NPAs and NYCC that comes in part from sharing elected members; (c) not result in any measurable impact on the quality of decision making; (d) be an unnecessary additional cost.
Yorkshire Local Councils Association	Would not support direct elections to national parks in the present circumstances as we take the view that there is already a good process of ensuring elected members (including those from parish and town councils) are matched with a small number of people with specific expertise. We wish to point out that this is a view only applicable to national parks because of their special status and should highlight the good work of those representatives who have been appointed to the boards by our own elective process amongst the parishes.
Association of	All of our members live or work in the Yorkshire Dales National Park. At our general meeting this month the

Rural Communities	majority agreed and supported the principle of directly electing some members of the National Parks. If the authorities were to remain the same size the AGM was in favour of replacing those members selected by Secretary of State National membership arrangements with the directly elected members. ARC members did, however, feel that it might be quicker, easier and cheaper just to increase the number of parish council representatives.
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The principle of direct elections was only partially supported by the local MP and the Association of Rural Communities. Their reference was either for the status quo or increasing the proportion of local representation via increase in the number of parish members. All other stakeholders were opposed to the principle. The local MP considered that there was a lack of democratic accountability particularly in relation to the Broads Authority. The National Park Authority considered that direct elections would not lead to any improvement in the effectiveness and efficiency of the National Park Authority. The mix of members together with the expertise and experience they bring to the National Park Authority has provided to be extremely beneficial. The County Council raised the point that direct elections to NPAs would: (a) introduce further confusion in the minds of the public as to the roles and responsibilities of elected councillors ("*in North Yorkshire we already have elected county, district and parish councillors*"); (b) potentially damage the existing synergy between the NPAs and NYCC that comes in part from sharing members; (c) not result in any measurable impact on the quality of decision making; and (d) be an unnecessary additional cost. Likewise the Yorkshire Local Councils Association considers that there is already a good process of ensuring elected members (including those from parish and town councils) are matched with a small number of people with specific expertise. The Association of Rural Communities was in favour of replacing those members selected by Secretary of State National membership arrangements with the directly elected members and it considered that it might be quicker, easier, and cheaper just to increase the number of parish council representatives. No one wanted a larger Park Authority.

### Other Organisations:

Respondent:	Comments:
Individual	Issues relating to local authority governance in Scotland.
English National Park Authorities Association	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>We find no evidence that demonstrates that their introduction to NPAs would significantly assist in the achievement of National Park purposes. This is because the current system is working well. The breath and experience of the membership also ensures that the National Park Authority can play a wider role in the development of the National Park on a national, regional and local stage. We believe that this is critical to the wellbeing of the National Park and its resident population. Despite some encouraging turnout figures when direct elections were first introduced, there has been a reduction (by as much as 60%) in the number of people standing for election to the Scottish NPAs after only one cycle. The long term sustainability of any perceived benefits therefore also needs to be considered seriously.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>No. As the consultation paper indicates, the size of NPA membership was considered during the Review of English National Park Authorities 2002. This concluded that the size of the NPAs should be reduced from their original size. ENPAA further considered the issue of size of NPA membership during the discussions over the introduction of Unitary Local Government. We came to the view that the current size of NPA membership should remain unchanged. We believe that the current number provides the right balance for membership composition; the active involvement of members; the efficient running of a public body; whilst recognising the time commitment and availability of members.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>We are concerned that replacing local authority members with those that are directly elected would have the effect of disenfranchising the local authorities with whom NPAs work with. This could have serious consequences for joint work on e.g. affordable housing, strategic planning, transport provision, and links to education authorities and community engagement. The achievement of National Park Management Plans requires the active involvement of the local authorities both directly within National Park boundary, as well as beyond. ENPA is aware of strong feelings by those members who have been appointed by their local authority – that they are already elected. Rather than members who had been appointed to serve on the NPA for the best interests of the National Park; the danger of introducing directly elected members would be that they would feel they need to act as a representative for their electorate. This has been documented as a problem for all Scottish NPAs. WE also wish to highlight the positive experience of parish members working on NPAs. They bring a practical understanding of community life within a National Park; can bring a challenge to nationally driven agendas and so help in the practical implementation of these; and in strengthening the link with local communities.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>ENPAA exists only to provide a collective voice for the nine NPASD. Since this question relates to one NPA only, we do not intend to comment.</p> <p><i>Do you have any outstanding issues?</i></p> <p>While we recognise that the Government is currently consulting only on the principle of Direct Elections, ENPAA does believe that the costs of the process should be proportionate to the benefits, with any additional expenditure funded by central Government. Were the Scottish Experience to be replicated within England on a per capita basis, we believe an extra £361,00 would need to be found on a periodic basis, say every 4-5 years. ENPAA would expect any additional expenditure to be met by central Government rather than reducing NPA budgets for work programmes that are making a positive contribution to the achievement of Defra's Natural Environment PSA and those of a range of other government departments. Annex 1 – Methods by which National Park Authorities are currently accountable to the public and (through Defra) to Parliament.</p>
Campaign for	<i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i>

National Parks	<p>CNP does not support the principle of direct elections for National Park Authorities and the Broads Authority because of the complexity and cost of introducing direct elections, the risk that members with strong anti-Park or single issue views might be elected, and the possibility that party politics might end up playing a greater role in NPA governance. In our view, while directly elected members would – at least in theory – meet demands for local accountability, they would be most unlikely to match the needs of, and to serve, the long-term interest. We believe that the desire for local accountability can be achieved more effectively. The consultation draft states that the current arrangements and the mix and combination of members seems to be working well ensuring that no grouping has a dominant position and that the work of NPA is free from the interference of party politics. The continuation of the current position should be encouraged.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>CNP would not support larger authorities if direct elections were to be introduced. The size of NPAs was reduced following the NERC Act 2006 in the interests of good governance and to retain the right mix of national and local members. Increasing the size of authorities would undermine the progress that has been made since 2006.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>If direct elections were to be introduced this should not in any way diminish the collective national expertise of Secretary of State appointed NPA members. Instead any elected members should replace a proportion of local authority (county, district and parish) members.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>We do not oppose the introduction of parish council members to the Broads Authority but consider that if these were introduced, it should not in any way diminish the collective expertise of members appointed to the Authority by the Secretary of State. In CNP's view, parish members should come from the local authorities' proportion of the membership and be appointed in addition to, and not instead of, those members appointed to represent particular aspects of the Broads' statutory purposes.</p> <p><i>Do you have any outstanding issues?</i></p> <p>Costs – the costs of introducing direct elections should be proportionate to the benefits, with any additional expenditure funded by Government and separate from the current National Park Grant. Politics – if direct elections for some members were introduced, individuals should be prevented from standing for election under a political badge; this would help to avoid party politics becoming more dominant in NPA governance. Parish members – the selection process for parish members varies across the National Parks, with some – such as the New Forest – working well, and others resulting in parish members being appointed to NPAs even though they might not have been formally elected to their nominating Parish Councils. Consideration should be given to standardising the process across National Parks and to introducing a protocol for nomination by parish councils.</p>
Commission for Rural Communities	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>We believe that in the right circumstances both direct and indirect elections can serve the statutory purposes of National Park Authorities well. Ensuring that wider regional and national interests are well represented on the National Park Authorities should be part of the contribution that the national appointees make.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>We do not have a view on this matter specifically. However, through our Participation Inquiry, we noted the importance of direct elections to parish and town councils. Our resulting recommendation was that all possible efforts should be made to support parish and town councils to become fully elected representative bodies. This is to ensure that parish and town councils have a mandate renewed and endorsed by the local electorate. Whilst the circumstances around elections to National Park Authorities are clearly different, the principle of a legitimised mandate applies.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>We do not have a view on whether or not there should be directly elected members. But if a decision is taken that there should be directly elected members, then, if the evidence is that the principle local authorities are not appointing councillors who represent constituents living in the National Park Areas, then it should be the principal authority representatives that should be replaced by directly elected members.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>In principle, we would support consistency of representation across the National Parks and would support the Broads Authority including Parish members.</p> <p><i>Do you have any outstanding issues?</i></p> <p>We suggest that the relationship between National Park Authorities and the new unitary authorities is carefully considered. This is especially so where National Park areas are 'contained' within new Unitary Authority areas (as is the case with the Northumberland National Park), rather than cutting across District and County boundaries. We note, for example, the greater emphasis from the Government's Local Government White Paper and from the Lyons Review into Local Government, on the place shaping role of democratically elected authorities. We feel that there are potential efficiencies which could be achieved if the administrative costs of the National Parks were considered alongside the efficiency gains achieved in moving to unitary structures of local government. There are potentially a number of different options for reform. We believe that Defra should consider these options: (a) National Park Authority planning departments merging with the unitary local authority planning department; (b) National Park Authorities integrating into the management structures of new unitary local authorities; (c) the links and support between National Park Authorities and unitary local authorities need to consider and strengthen neighbourhood management, community representation and plans (such as Parish Plans and community led plans), National Park management plans, and local authority Sustainable Community Strategies.</p>
Local Government Association	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>Direct Elections would be contrary to National Park purposes. The Authorities have benefited from the existing membership structure whereby the influential role of their members has enabled national park issues to be understood by decision makers in local government. LGA is concerned that direct elections would weaken the links between the Parks and those bodies. Directly elected members could give rise to fragmentation in local representation caused by a growth in "single issue" or "single community" biased members who would stand on a platform of support or opposition to particular policies rather than the overall interests of the national park or its communities as a whole and the growth of party politics which would not be in the interests of the Parks.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>Opposes larger authorities and agrees with circular 12/96 that National Park Authorities should be as small as possible consistent with the effectiveness and the equitable distribution of local representatives.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected</i></p>

	<p><i>members?</i></p> <p>Strongly supports the role of the Secretary of State members. The relationships between relevant local authorities in delivering the services for which they are responsible and contributing to joined up delivery of services through Local Area Agreements and the relevant Strategic Partnerships, are essential to enable the Park and Broads Authorities to fulfil their statutory purposes and are relevant to their duty to foster the economic, social and environmental wellbeing of local communities within the National Park. Would not support any proposal to lose local authority members to enable the introduction of directly elected members. Replacing existing parish members with directly elected members could result in an authority membership less representative of local communities than at present.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>LGA notes that inclusion of Parish Members could result in a strengthening of accountability, but does not consider that their contribution could outweigh that provided by the current local authority members. On that basis the LGA does not support the introduction of parish members onto the Authority at the expense of reducing current local authority, Secretary of State, or Navigation Committee appointees.</p> <p><i>Do you have any outstanding issues?</i></p> <p>The perceived democratic deficit would not be addressed by the introduction of a small number of directly elected members which could result in a less representative authority. Increasing the number of directly elected members at the cost of representation from local authorities would reduce the capacity of the Authorities to punch above their weight as a result of working in partnership with others.</p>
Royal Yachting Association	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>We disagree with and object to the principle of Direct Elections to the National Park Authorities and to the Broads Authorities. The National Park Authorities and the Broads Authorities are of national importance, and as such, membership of the Authorities should reflect national as well as local interests. The Consultation Paper states that the use of direct elections for national members does not appear to be feasible and if, this is the case, direct elections would only apply to the appointment of local members. Consequently, the Authority would comprise a combination of elected local and appointed national members and the RYA does not believe that this would be practicable. Direct elections would inevitably politicise the local membership of the Authorities and there may be a tendency for the local members to bow to local and political electoral pressures. In addition, if the Authorities comprise both elected and appointed members, in our view there is likely to be tension between these two groups if the elected members were, for example, to claim that their views had greater legitimacy by virtue of being unduly influenced by local pressures, rather than making decisions which take proper account of national interests, for example the interests of conservation and navigation. In our view, however, it is likely that recreational boating interests would represent only a small proportion of the total electorate and direct elections might serve to reduce, rather than increase, the influence of recreational boating interests in the Authority.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>We do not believe that direct elections would benefit National Park Authorities or the Broads Authority and we do not therefore agree with direct elections resulting in larger authorities.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>No comment made.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>We do not have any difficulty in principle with an individual parish or town councillor being appointed to the Authority if the Secretary of State considers that that person represents the interests of boating, conservation, farming and landowning or land based recreation. However, we do not believe that it is necessary or appropriate for parish or town councillors to be appointed simply by virtue of being parish or town councillors, particularly since this would then reduce the number of appointees representing the interests of boating, conservation, farming and landowning or land based recreation.</p> <p><i>Do you have any outstanding issues?</i></p> <p>None at this stage.</p>
Lewes District Council	<p>The Council reaffirms its in principle support for the designation of the South Downs National Park; in principle, the introduction of direct elections to English National Park Authorities; and in the event that direct elections are introduced to English National Park Authorities, there should be a flexible formula for electoral arrangements which recognises the differences between sparsely populated National Parks covering a few local authority areas (e.g. Northumberland and Exmoor) and the more highly populated areas (e.g. the South Downs and the Peak District) covering a large number of local authority areas.</p>
Natural England Board	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>We do not object to the principle of Direct Elections but are of the view that they would not provide significant benefits for English National Parks.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>No – Recent government policy promoting smaller NPAs has worked well in promoting efficiency and keeping authority running costs manageable. A reversal of this policy would be counterproductive.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>Given that direct electees would provide local representation the obvious solution would be to replace the Parish representative grouping.</p> <p><i>Do you wish for the Broads to have Parish members bearing in mind the overall size of the Authority and replacement of any existing members to accommodate them?</i></p> <p>No – If direct elections were introduced to the Broads Authority there appears to be little alternative to expanding its size. Direct electees would provide the grass roots local representation instead of parish nominees.</p> <p><i>Do you have any outstanding issues?</i></p> <p>Yes – if it was decided to introduce Direct Elections for a proportion NPA membership consideration would need to be given to whether the same approach should be adopted for AONB Conservation Boards. There is the possibility of piloting the approach in two existing Boards. This could help identify pitfalls prior to wider implementation by NPAs. The two existing Conservation Boards have been approached on this matter and have no objections to the thrust of our response on direct elections.</p>
Prof and Mrs Shepherd	<p>Think that it would be highly desirable to have a substantial number of directly elected members of all National Park Authorities: possibly even a majority of such members. As you will be aware there is currently a major row over the draft Plan for the New Forest National Park, and there is no doubt that the anger and resentment created by this plan have been seriously exacerbated by the fact the National Park Authority is wholly unelected. We have had directly elected Parent Governors of schools for decades, and it seems incredible that we do not</p>

	already have direct elections to NPAs. Then at least people would have representatives with a direct responsibility for taking their views into account, which at present they do not.
West Sussex County Council	<p><i>Do you agree/disagree or support/object with/to the principle of Direct Elections?</i></p> <p>West Sussex County Council supports (subject to the responses to questions 2 and 3 below) the principle of direct elections to national park authorities. A system of direct election (as envisaged in the response to question 3 ) will go some way towards improving the unsatisfactory situation whereby officials, who have no democratic mandate and are appointed by the Secretary of State, play a central role in making decisions which should be made by members who are accountable to the local electorate.</p> <p><i>Do you agree with direct elections resulting in larger authorities?</i></p> <p>The Council do not have a view on this question nationally but if/when the South Downs National Park is confirmed, the composition of that authority should, as a minimum, comply with the Inspector's recommendation of 34 seats within 18 local authority members.</p> <p><i>If authorities were to remain the same size, which members should be replaced in favour of directly elected members?</i></p> <p>It is the view of the Council that those national park authority members who are appointed by the Secretary of State should be replaced in favour of directly elected members. A strong case can be made for all members to be directly elected but it is the Council's view that removing local authority members from national park authorities would be detrimental to the national park. In order for a national park to be successful, it is vital that the national park authority and constituent local authorities are able to cooperate effectively on matters such as rights of way, highways, economic development and planning. The best way of securing this degree of cooperation is to retain the close ties between national park authorities and constituent local authorities at member level. The Council is not convinced by the argument that nationally appointed members are necessary to ensure that the national interest is represented. Currently, all national park authority members serve the interest of the national park as a whole; there is no distinction between the duty of members who are appointed by the Secretary of State and those who are appointed by local authorities. The argument that nationally appointed members are required because they tend to have a background in a related profession such as planning or conservation is equally unpersuasive. If technical advice is required this should be provided by officers employed by the national park authority, in the same way that local authority members receive advice from employed officers.</p>

The principle of direct elections was only supported by Lewes District Council, two individuals, and West Sussex County Council. Other stakeholders were not supportive. No one requested larger park authorities.

The English National Park Authorities Association found no evidence that demonstrates that direct elections would significantly assist in the achievement of National Park purposes. It considers that the current system is working well and that the breadth and experience of the membership also ensures that National Park Authorities can play a wider role in the development of the National Park on a national, regional and local stage. It considers that this is critical to the wellbeing of the National Park Authorities and their resident population. Despite some encouraging turnout figures when direct elections were first introduced, there has been a reduction (by as much as 60%) in the number of people standing for elections to the Scottish NPAs after only one cycle. A loss of local authority seats with disenfranchise the local authorities with whom the NPAs work with leading to serious consequences for joint work on affordable housing, strategic planning, transport provision, and links to education authorities and community engagement. Parish members also bring a practical understanding of community life within a National Park; can bring a challenge to nationally driven agendas and so help in the practical implementation of these; and in strengthening the link with local communities.

The Campaign for National Parks opposes direct elections because of the complexity and cost of introducing direct elections; the risk that members with strong anti-park or single issue views might get elected, and the possibility that party politics might end up playing a greater role in NPA governance. The current arrangements and the mix and combination of members seems to be working well ensuring that no grouping has a dominant position and the work of NPA is free from the interference of party politics. They were opposed to any reduction in the Secretary of State members instead preferring for a reduction in the local authority membership. Any Parish members appointed to the Broads should be in addition to the existing membership. The Commission for Rural Communities is neutral on this issue with emphasis on ensuring that wider regional and national interests are well represented on the National Park Authorities with direct elections replacing local authority members. They suggested merging National Park Authority planning department with their unitary authorities' equivalent. And Natural England considered that direct elections would not bring any significant benefits for the English National Park Authorities and that the obvious replacement of members would be the parish members.

The Local Government Association was opposed to the principle of direct elections and considers that it would be contrary to National Park purposes because the Authorities have benefited from the existing membership structure whereby the influential role has enabled national park issues to be understood by decision makers in local government. LGA is concerned that direct elections would weaken the links between the Parks and those bodies. Directly elected members could give rise to fragmentation in local representation caused by a growth in "single community" biased members who would stand on a platform of support or opposition to particular policies rather than the overall interests of the national park or its communities as a whole and the growth of party politics which would not be in the interests of the Parks. Those views were echoed by the Royal Yachting Association who emphasised that the membership of the Authorities should reflect national as well as local interests and raised the potential issue of a conflict between national and local issues. Two individuals, Lewes District Council and West Sussex County Council supported the principle for reasons of local representation and democratic accountability. The Councils indicated that they did not want any local authority seats to be removed

and preferred the national members to be replaced with directly elected members because of the close relationship between the Park Authorities and local authorities on a range of local issues.

### **3. Overall Summary:**

The strongest support for the principle of Direct Elections came from respondents within the Broads Authority and New Forest National Parks for reasons of local democracy and local representation in relation to planning decisions. And there was very little or no support for larger authorities to accommodate directly elected members. Most stakeholders considered that direct elections would not lead to any improved effectiveness or efficiency of National Park Authorities, including the Authorities themselves, for reasons of (a) the elections being politicised and candidates with a political agenda being elected to serve on National Parks; (b) danger of single-issue candidates being elected who would have a very narrow agenda and no real interest in the issues facing national parks; (c) substantial cost in having direct elections; and (d) local accountability already being secured through many members being “indirectly elected” (i.e. Parish County, District etc). Some stakeholders pointing out that the evidence shows that in general members emerging from direct elections would be little different from the existing mix with anxieties about individuals pursuing personal political goals. The strong support for local representation in the Broads Authority probably arises from the fact that it currently has no Parish Members rather than specifically relating to the issue of directly elected members. As pointed out by the Broads Authority, the Broads doesn’t seem to have a large enough potential electorate to justify direct elections.

Many National Park Authorities, Local Authorities and Parish Councils expressed concern that direct elections in place of their representatives would have the effect of disenfranchising the local authorities and parish councils whom the Park Authorities work with leading to the effect of serious repercussions in relation to their influence with other bodies, particularly at regional and national level. Moreover, most of those bodies already point out that under the present arrangements, a large number of National Park members have already been subject to an election process to secure a place on a County, District, Borough, Parish or Town Council. Direct elections could create larger and more remote authorities which would not necessary be in touch with the varied and individual needs of local communities. They considered that the existing system seems to be working well. Moreover, there appears to be no consensus on which member to replace to accommodate directly elected members. All categories of members have provided a significant contribution to the effective working of the Authorities. However, many individuals who live in the parks and MPs have raised the issue of democratic accountability and local representation for local communities in the Parks.