



DOE

Department of
the Environment
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Consultation Document on
Enabling Legislation
for National Parks

August 2011

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Responding to this consultation

There is no requirement to respond to all the questions in this consultation.

Response method

Responses to this consultation can be sent either by post or email to:

Post

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Department of the Environment
Environmental Policy Division
8th Floor
Goodwood House
44 – 58 May Street
Belfast, BT1 4NN

E-mail:

National.Parks@doeni.gov.uk

You are invited to respond to this consultation no later than 31st October 2011.

Should you have any enquiries please send them to National.Parks@doeni.gov.uk or call 02890 254721

An electronic copy of the consultation document can be obtained if required by using the contact details above. It is also available on the Department's website at <http://www.doeni.gov.uk> (click on 'Natural Environment' and on 'National Parks').

This document may be made available in alternative formats. Please contact us to discuss your requirements. Information and additional copies of the document can be requested by Text phone on 02890 540642.

Freedom of Information Act 2000 - Confidentiality of consultation responses.

The Department of the Environment (DOE) may wish to publish responses to the consultation document. It will certainly publish a summary of responses following completion of the consultation exercise.

In addition, your response may be disclosed on request.

DOE is only able to refuse disclosure in very particular circumstances. Therefore, you are advised to read the information at Appendix 3 before sending a response to this consultation document. It provides guidance on the legal position of any information given by you.

Should you require further information about confidentiality of responses, please contact:

Information Commissioner's Office (Northern Ireland)
51 Adelaide Street
Belfast
BT2 8FE

Telephone number:

028 9026 9380

Fax:

028 9026 9388

Alternatively, your request can be sent electronically to ni@ico.gsi.gov.uk
Information can also be accessed at: www.informationcommissioner.gov.uk

What happens next?

Following the closure of the consultation on 31st October 2011, all responses will be analysed and considered, along with any other available evidence to help us reach decisions on the development of enabling legislation for national parks for Northern Ireland.

My predecessor launched a White Paper on Enabling Legislation for National Parks prior to the Assembly elections earlier this year. At that time it was announced that further material would be made available for consultation at a later date. I am making that material available now through this document.

I am on record as saying that I favour the concept of national parks. We are fortunate in having a number of areas that are likely to meet the proposed criteria set out in the White Paper. However, the debate over the designation of a specific area will be for another day and will involve the whole Executive, as well as further public consultation.

In the meantime, I hope that many people will take this opportunity to discuss the issues surrounding a national park and to consider the specific questions that we have posed. I recognise that some have genuine concerns about the impact that a park might have on them, their homes and their businesses. But I want to create a consensus and bring all stakeholders on board. I believe that most people accept the principle of a national park – it is putting the principle into practice that creates anxieties.

That is why my Department is publishing this comprehensive consultation paper. It brings together in one document all our thinking, and it looks in detail at how a national park might be managed in a way that reconciles both local and national interests.

We seek recognition of our most cherished landscapes through the national park label, while utilising it as an economic driver that will boost local business and provide sustainable employment and new business opportunities for this and future generations. Above all, we want to create a national park model that is right for our local circumstances.



A handwritten signature in black ink that reads "Alex Attwood". The signature is written in a cursive, flowing style.

Alex Attwood MLA
Minister of the Environment

1. The Department published a White Paper on Enabling Legislation for National Parks on 24 March, prior to the recent Assembly elections. The paper focused on our policy in relation to the proposed aims, selection criteria and the designation process associated with national parks.
2. It also announced that further material would be published during the consultation period. This would look in more detail at the various governance options for a national park and seek responses to a number of questions on the full range of national park issues.
3. To avoid unnecessary repetition, this latest document includes the White Paper as an Appendix. It also brings together and expands the Department's thinking on the constitution of a management body, the responsibilities and skills of board members, and a wide selection of governance options.
4. One of the potentially most sensitive issues in relation to national parks is that of access. In this paper we have set out our thinking on access and on occupiers' liability, to which access is closely associated. We hope that this stance will serve to reassure landowners and farmers in particular, as we seek to develop a national park model that is appropriate for Northern Ireland.
5. The appendices include an outline Regulatory Impact Assessment. As this impact assessment relates to enabling legislation, this is of necessity short on facts and figures. When we reach the point of designating a specific area, it should be possible to provide a more detailed analysis.
6. Finally, as mentioned above, we have included a list of consultation questions to which we would particularly welcome responses. These relate to both this document and the White Paper (which is included as Appendix 1). The list does not claim to be exhaustive, and we welcome any other comments that respondents may wish to make on the issue of national parks generally.

1. The White Paper on Enabling Legislation for National Parks highlighted the need for any national park to have a competent management body with adequate funding. The following paragraphs seek to expand on the contents of the White Paper to give consultees a stronger flavour of the Department's current thinking.
2. In pursuit of delivery of park aims it is envisaged that any national park would require a management body that would need to be able to initiate, facilitate and encourage development in its broadest sense. For example, it is expected that the body would have an intimate knowledge and understanding of the area, its natural and built heritage, its culture and its communities. It would seek to encourage and cultivate ideas (not necessarily its own); plan strategically; and develop and manage programmes for the betterment of the park area. When appropriate, it would arrange specialist input – for example, research, marketing, mentoring, training, education and advice.
3. Above all, a management body would promote the park and public enjoyment of it for the benefit of all the people of Northern Ireland and beyond. The body would have a duty to foster the economic and social wellbeing of any area identified. A national park ethos sits very easily with the Department's objective of environmental justice. In practical terms, environmental justice strives to ensure that everyone has a right to expect to benefit from a clean and healthy environment, free from pollution or other detrimental activities.
4. Of course, a national park is not just about environmental goals. The evidence from national parks established elsewhere shows that the benefits derived also align closely with other Departments' objectives. For example, rural development; health and wellbeing benefits; research, scientific and educational opportunities; and tourism and other economic gains. In addition to Government's aims, national parks promote a sense of civic pride, both locally and nationally, which comes with promoting the unique and positive qualities of particular parts of Northern Ireland.
5. Therefore, any management body would need to be able to focus on the area of the park. It should be able to manage its own budget (in a closely audited and transparent fashion), with the flexibility to borrow, bring in resources from a range of sources (for example, European funding and the Lottery), and make grants and loans. It would need the capacity to enter into financial and other agreements and contracts, including the ability to form companies or partnerships and coalitions with other interested parties. The power to employ people with the right skills and profile would be crucial in fostering a skilled workforce to serve the park and its people. The body may also need the authority to make by-laws to assist with visitor management issues and to acquire land by agreement. It would thus need to be a separate legal entity to facilitate the foregoing activities.

Governance Options

6. The White Paper highlighted that there was a wide range of governance options. Of these, two particular models stood out as providing a substantial level of local input. These were a local independent body for each park or a joint governance committee comprising district council representatives and departmental appointees. However, the Department is keen to explore all possibilities to provide a structure which is right for Northern Ireland. The pros and cons of all the options are considered below, but there may be other scenarios which the Department has not highlighted, and we would be keen to hear views as to their relevance.

Option 1: DOE

7. Under this option DOE would act as Northern Ireland's National Parks Service and would open and staff a local office in each park and provide day-to-day park management. A local national park advisory committee would also have to be established in each park to counter criticisms of decision making being out of touch with local people. It is anticipated that this option may be perceived to be too conservation focused and may stifle innovation and enterprise and hinder focused park management. In Britain national parks are not managed by a central government department. This is in contrast to the Republic of Ireland where publicly-owned national parks are managed in this way. The advantages and disadvantages of this option are summarised below:

Advantages:

- Well placed to ensure effective representation of the national interest.
- Obviates the need for creation of an independent body.
- Brigades national park management and management of Areas of Outstanding Natural Beauty (AONBs) in the same organisation.

Disadvantages:

- Hampers a clear focus being brought to bear on the specific functions of landscape management.
- Less flexible and responsive to local needs than other options.
- Less innovative and enterprising approach to landscape management.
- Centralised nature is a serious weakness – park management would be viewed as remote and out of touch with local people.
- Park management suffers from being an appendix to a parent organisation which has other priorities.
- Lower park profile with attendant risk of reduced economic benefits.

Option 2: Single independent body with Northern Ireland-wide remit for both national parks and AONBs

8. The body would effectively be a Landscape Protection Service for Northern Ireland with a headquarters in some central location. The body's activities would be monitored by DOE. It would need to create the local advisory structures described in option 1 above to counter criticism of remoteness from local people. The extent to which additional structures and resources would be needed to deal with AONBs would depend very much on whether AONB legislation is strengthened or not.
9. The arm's length agreement associated with the independent body approach is particularly suited to national park management. It would allow the management body to focus in depth on the clear and specific functions and purposes which lie at the heart of landscape protection. It would also permit a flexible, responsive and innovative approach.
10. A potential issue with this option is its centralised nature which may make it remote from local people. In addition, it would be responsible for a very large number of sites (there are eight existing AONBs). Consequently, it would be impossible to populate a governing board in any meaningful way with people who would be representative of any particular site.
11. The advantages and disadvantages of this option are summarised below:

Advantages:

- Clear focus on the specific functions of landscape management.
- Focused management unfettered by the corporate pressures of a parent organisation.
- More flexible and responsive to local needs than option 1.
- More innovative and enterprising approach to landscape management.
- Brigades national park management and AONB management in the same organisation.
- Well placed to ensure effective representation of the national interest.

Disadvantages:

- Centralised nature is a potential disadvantage – park management could be viewed as remote and out of touch with local people.
- Extremely difficult to populate the body's governing board with people representative of the area being managed given the large number of geographically separate sites.
- Potentially bureaucratic with three layers of management.
- Raises expectations about AONB management which may not be fulfilled.
- Risks dilution of the impact and benefit of the national park initiative.

Option 3: Single independent body with Northern Ireland-wide remit for national parks

12. Under this option the body would effectively be a National Parks Service for Northern Ireland. It would establish a regional headquarters in an appropriate central location and it would need to establish a local office in each park. It would also need to set up a local national park advisory committee in each park in order to give local people some voice in park management. The body's activities would be monitored by DOE.
13. The arm's length arrangement associated with the independent body approach would be suited to national park management. It would allow the management body to focus in depth on the clear and specific functions and purposes which lie at the heart of landscape protection. It would also permit a flexible, responsive and innovative approach.
14. In common with the previous two options, this option would probably be based in a centralised location. The prospect of decisions about local governance being taken by a remote, unelected body may be unpopular. This model has not been adopted either in the United Kingdom or the Republic of Ireland. Scotland recently reviewed its two independent local national park management bodies after five years of operation and concluded that the present decentralised arrangements should continue. The advantages and disadvantages of this option can be summarised as follows:

Advantages:

- Clear focus on the specific functions of park management.
- Focused park management unfettered by the corporate pressures of a parent organisation.
- Offers flexible and responsive operation.
- Provides innovative and enterprising approach to park management.
- Well placed to ensure effective representation of the national interest.

Disadvantages:

- Centralised nature is a potential weakness – park management could be viewed as remote and out of touch with local people.
- Difficult to populate the body's governing board with people representative of the area being managed.
- Bureaucratic – there would be three layers of management (Department, centralised body and some form of local advisory committee).
- Perceived cumbersome approach if Northern Ireland is limited to one or two national parks in the short to medium term.

Option 4: District Council

15. This option would deliver local governance and obviate the need for the creation of a new independent organisation. It would also sit comfortably with the other powers that may be devolved to district councils, such as land use planning and community planning. Under this option DOE would have an overarching policy influencing, monitoring and sponsoring role, while park management would be a district council responsibility. Each park would be managed by a district council committee or, in the case of a park straddling district council boundaries, a joint district council committee. We would propose that the district council committee would establish a local office in the park. There would be no need to set up the local national park advisory committees envisaged under options 1, 2 and 3, but there would be a need to introduce some sort of mechanism for ensuring that the national interest is represented on the management body.
16. However, this option is not without drawbacks. For example, the guaranteeing of effective representation of the national interest is likely to prove problematical. This model has been tried in England and Wales, particularly in the early years of national park management, but it was subsequently abandoned. It was considered in Scotland but not adopted in either national park. The advantages and disadvantages of this option are summarised below:

Advantages:

- Delivers local decision making and local accountability.
- Would sit comfortably with other possible roles for district councils in relation to land use and planning, community planning, and rural development and regeneration.
- Obviates the need for creation of an independent body.

Disadvantages:

- Hampers a clear focus being brought to bear on the specific functions of national park management.
- Park management suffers from being an appendix to a parent organisation which has other priorities. This was an important consideration when England moved away from local authority-run parks and set up independent park authorities in the 1990s.
- Need for Councils to manage a wider remit may stifle the adoption of a flexible, responsive and innovative approach that has been developed in national parks elsewhere.
- Lower park profile with attendant risk of reduced economic benefits.
- Potential weakness around the issue of ensuring effective representation of the national interest.
- Cumbersome where a park straddles a district council boundary.

- As district councils are likely to be the planning authorities, this may be perceived to be a more restrictive planning regime. It could result in more opposition to a proposed park designation.
- Not favoured by established national parks elsewhere which saw merit in an independent, dedicated management organisation.

Option 5: A Local Independent Body for Each Park

17. The local body's governing board would be structured to ensure that both the national and local interests have effective representation. DOE would set up a small sponsoring unit to oversee the body's activities. The creation of the governing board described above would obviate the need for the creation of the sort of national park advisory committees envisaged under options 1, 2 and 3.
18. As is the case with options 2 and 3, the arm's length arrangement associated with the independent body approach is particularly suited to national park management. It would allow the management body to focus in depth on the clear and specific functions and purposes which lie at the heart of landscape protection. It would also permit a flexible, responsive and innovative approach.
19. The advantages and disadvantages of this option are summarised below:

Advantages:

- Clear focus on the specific functions of national park management.
- Focused park management unfettered by the corporate pressures of a parent organisation.
- Offers flexible and responsive operation.
- Provides innovative and enterprising approach to park management.
- Delivers local decision making and secures local buy-in while at the same time allowing for effective representation of the national interest.
- Less bureaucratic than the centralised independent body option.
- Facilitates promotion of a high profile for the park and maximisation of the economic benefits of designation.

Disadvantages:

- Need for review if and when subsequent parks are proposed.
- More expensive than a centralised solution which utilises an existing organisation such as DOE or a district council.

Analysis of Options

20. It will not be possible to take a definitive decision as to the most appropriate organisational arrangements in advance of a full economic appraisal. However, in the meantime the Department has undertaken an initial analysis of the options to inform this consultation exercise. There are several key advantages in an independent organisation (option 5) including the ability of such an organisation to achieve a clear locally-engaged focus and an ability to flexibly address the many challenging cross-cutting issues associated with establishing and managing a national park. The main disadvantage with this option is the potential cost compared with the other options which could use existing HR, financial systems and corporate services resources as well as existing accommodation and expertise. Option 4 (the district council option) is a compromise, providing for greater local input to an area's management, while being less costly. Given the advantages associated with options 4 and 5, some further analysis is provided on each of them below.

Further Analysis of Option 4

21. While the primary key advantage of option 4 is the ability of this option to facilitate local input, it also has several potential disadvantages which could possibly hamper effectiveness. A district council driven approach may hinder an in-depth focus being brought to bear on the specific functions and purposes that lie at the heart of national park management. The need for councils to manage their wider remit may stifle the adoption of the flexible, responsive and innovative approach which parks in Britain have been able to employ to the benefit of parks' communities and their landscapes. Significantly, this option has already been tried out in England and Wales and has been discarded in every case in favour of the special purpose independent body option.

Further Analysis of Option 5

22. Governance was a critical issue in establishing national parks elsewhere and the consensus was that park management should be delivered by an independent dedicated management organisation rather than a district council.
23. The arm's length arrangement associated with an independent body approach is particularly suited to national park management. It would allow the management body to operate at some level of independence from Ministers and to focus in depth on the clear and specific functions and purposes which lie at the heart of landscape protection. An independent body would also be unfettered by the corporate pressures of a parent organisation, allowing it to adopt a flexible, responsive, innovative and enterprising approach that could maximise the economic, social and environmental benefits of a national park.
24. This option has the added advantage of having been proven elsewhere to be efficient and

effective. Crucially, Cabinet Office, and Department of Finance and Personnel (DFP), guidance is that this type of arrangement is appropriate for regulatory and specialist advisory functions. The DFP Classification Guide states that NDPBs are ideally suited in areas where political considerations should play little part in decisions but where it is agreed the function should still be carried out in the public sector. Preliminary discussions with DFP officials have confirmed the appropriateness of this approach.

Cost of Option 5

25. As the overall thrust of the consultation exercise is to take forward enabling framework legislation only, it has not been possible to cost any of the options with any degree of exact accuracy. This will only be possible when a specific area has been identified and factors such as population, topography and the size of the area can be taken into consideration, as well as any other significant issues that are unique to that locality and which could impact on governance.
26. However, general costings based on perceived activities for a national park management body may be in the range of up to £2m, calculated as follows:

ACTIVITY	COST
Promoting understanding of an area. (Includes visitor centre(s), media promotion, marketing of brand, information boards, developing corporate image, educational material, working with locals to explore business opportunities, integrating and coordinating actions/resources of other public bodies, etc.)	£800,000
Conservation of natural and cultural heritage. (Includes grants to other bodies and individuals within park boundary to undertake measures to conserve/enhance local environment, path restoration, control erosion, enhance local places of interest, upgrade infrastructure such as car parking, etc.)	£200,000
Promoting enjoyment of the area. (Provide a service to local communities and visitors to ensure the national park's assets are fully utilised in a sustainable way while not being degraded due to misuse, litter, lack of information or vandalism.)	£200,000
Staffing (approximately 20 full time) (To manage the national park area as set out above. Staff complement would include administrative, ranger/volunteers, visitor centre/educational, marketing/media, as well as HR/finance and chief executive. Also possibility for a grant officer to pursue EU, HLF or other relevant funding opportunities.)	£600,000
Total	£1,800,000

27. In addition to the above, there will be additional start-up costs in terms of securing leases to relevant properties to accommodate staff, as well as purchasing ICT, other office equipment and possibly vehicles.
28. The potential costs associated with setting up and running a national park – around £2m per year – may appear excessive to devote to a particular and defined area. However, experience in national parks in Britain has clearly demonstrated that such expenditure attracts and generates a great deal of income. For example, an assessment of benefits of national park authorities undertaken by Defra in May 2011 identified clear financial multipliers. According to the Defra document, “as Northumberland spends approximately £900,000 on tourism annually, this gives a cost benefit ratio of 1:9.”. In addition, “in terms of promoting recreation, an illustrative cost benefit ratio of 1:4 is calculated for all Great Britain national parks.”.
29. In addition to clear monetary benefits, there are also benefits in terms of promoting health (physical and mental wellbeing) within the natural environment. While it is impossible to quantify the level of this benefit for individuals, or to cost direct or indirect savings to the health and social services, the linkages between green spaces and wellbeing have been well documented in medical journals and other relevant literature.
30. Another benefit associated with national parks in Britain is on-going initiatives to encourage socially excluded groups that would not usually access such areas to enjoy the benefits which national parks have to offer. Social exclusion is a short-hand term for what can happen when people or areas have a combination of problems, such as unemployment, discrimination, poor skills, low incomes, poor housing, high crime and family breakdown. These problems are linked and mutually reinforcing. Social exclusion is an extreme consequence of what happens when people do not get a fair deal and find themselves in difficult situations. Initiatives within national parks try to encourage greater participation in activities, to build confidence and foster self-belief within individuals. Again, a very difficult benefit to cost in monetary terms.

Conclusion of Analysis

31. The evidence therefore indicates that if the economic, social and environmental benefits of a national park are to be maximised through local engagement, options 4 (district council) and 5 (the independent body option) appear to provide the best solution.
32. It is hoped to designate a national park in the short to medium term following enabling legislation coming into force. In the event that Northern Ireland was to establish a second or third national park, there would be scope under option 5 to secure efficiencies by having the various park management bodies share services such as human resources, IT, finance and estate management.

Constitution of a Management Body

33. If it were to be decided that a national park management body is to be an independent organisation, it would need to have a mechanism to manage its day-to-day activities. Our proposal is that this would be achieved by having a governing board to control the body's operations.
34. We would envisage that the board Chair would be responsible to the DOE Minister. The Chair would ensure that the body's policies and actions support the wider strategic policies of the Minister, and that the body's affairs are conducted with probity and parsimony. The Chair, together with a Deputy Chair and the other board members, would have corporate responsibility for ensuring that the body fulfils the aims and objectives set by DOE and for promoting the efficient, economic and effective use of staff and other resources by the body.
35. To this end, the board would establish the overall strategic direction of the body within the policy and resources framework determined by DOE. It would ensure that the Department is kept informed of any changes that are likely to impact on the strategic direction of the body or on the attainability of its targets, and determine the steps needed to deal with such changes. It would ensure that any statutory or administrative requirements for the use of public funds are complied with and that the board operates within the limits of its statutory authority. It would receive and review regular financial information about the body's management and demonstrate high standards of corporate governance, including the creation of an independent audit committee (as a subcommittee of the board) to help the board to address key financial and other risks.
36. In order to command widespread support and local credibility, it is suggested that any proposal about the membership of the governing board would need to enshrine at least 60% local representation. Based on the Scottish model, a possible mix of membership categories on the board might be: 20% park dwellers, 40% district council nominees who would be appointed by the Minister, and 40% Ministerial appointees who would represent the national interest and would also exercise an important role in relation to both supporting and constructively challenging the other board members. This mix of membership categories would facilitate local decision making and at the same time allow for effective representation of the national interest and safeguard accountability issues.
37. Consultation responses will assist in developing detailed proposals in relation to board membership and, in particular, a proposed mechanism for selecting the people who would comprise the 20% park dwellers element of the board. Options would appear to be either to hold a local poll to elect people to the board or use the public appointments process to make Ministerial appointments.

38. The question of whether places on the board should be reserved for representation of particular organisations other than district councils is a matter for debate, but the inclusion of certain bodies and the exclusion of others would seem likely to be problematical.
39. It is suggested that, in common with practice in relation to many other NDPBs, board membership would carry with it disqualification from membership of the Northern Ireland Assembly.
40. The board would need to be able to appoint subcommittees to assist it in the discharge of its functions, and the desirability of having an audit committee (ideally chaired by one of the national interest appointees) has already been discussed above. It would also be desirable for a subcommittee to be able, with Ministerial approval, to co-opt persons as members.
41. Consultation responses will also be important in helping to develop a proposal in relation to selection of the Chair and Deputy Chair of the board. There are a number of options to consider including:
 - I. The Minister appoints a Chair and Deputy Chair following an open public appointments competition.
 - II. The Board elects its own Chair and Deputy Chair from within the (whole) board membership. However, there is a potential and significant disadvantage with this option from a public accountability standpoint. If the board includes people who have been elected onto the board rather than appointed by the Minister, a situation could arise where the Chair and Deputy Chair are people who are not accountable to the Minister.
 - III. The Board elects its own Chair and Deputy Chair from within the Ministerial appointee element of the board membership.
42. The size of the board is also something which needs to be debated. Scotland's two national park management bodies (Cairngorms and Loch Lomond & the Trossachs) began with 25 members (the maximum permissible under the Scottish enabling legislation) and derived benefits in their initial phase in being able to draw on the resource of a larger board than would be required solely to achieve effective governance. Following review, the size of the Scottish boards has been reduced to 19 and 17 respectively. The norm for NDPB board membership is in the range 10 to 15 and it is suggested that the maximum size specified in Northern Ireland national parks enabling legislation might be no higher than 20; flexibility would exist to specify a lower figure in the subordinate legislation that actually designates a park. It is envisaged that all board members would be remunerated.

Responsibilities and Skills of Board Members

43. All board members would share a corporate responsibility for the proper conduct of the body's affairs and for ensuring that staff maintain the strictest standards of financial propriety. Board members would be expected to act in the best interests of the body rather than the interests of any other organisation or nominating body. The board would have a duty to ensure that the requirements of propriety, regularity and value for money are met in its use of public funds.
44. It is envisaged that the national interest appointees would provide a national voice on the body and take a particular interest in strategic issues such as conservation, recreation, planning, access and resource issues. They would be expected to understand the concept and practice of sustainable development and come from a broad range of backgrounds. Collectively they would bring a range of skills and experience including an understanding of issues affecting protected landscapes; leadership and management skills; an awareness of the views of people not living in or near the national park; corporate services skills; expertise in strategy formulation, development, evaluation and communication; and experience of wider issues such as work with young people, environmental projects, social inclusion work, or an active interest in outdoor recreation.
45. District council nominees and park dwellers would together make up the rest of the board membership and be in a majority. This would ensure that the board is equipped with detailed knowledge of the park area and awareness of local issues and requirements. It would also ensure that the board is responsive to the needs of the park's communities.

46. It is proposed that district councils would continue to exercise their powers under the Access to the Countryside (NI) Order within a national park. A park management body would be expected to work very closely with district councils and others in order to promote countryside recreation, but it would not be the access authority. It is envisaged that the management body would, in partnership with others, develop an access strategy for the national park and promote public enjoyment of the area's special qualities. It is also envisaged that a management body would make a significant contribution to the important task of managing public access within the park by providing a ranger service and other facilities and working with landowners, walkers and other park users to resolve problems.
47. Discussions with stakeholders have revealed that landowners have concerns about increased risk in relation to occupiers' liability as a result of national park designation attracting more visitors. The current occupiers' liability legislation was carefully reviewed by the Department of Finance and Personnel (DFP), and it was found that the current regime properly reflects a balance between the rights of landowners and the interest of people wishing to access land for open air recreation. Public information leaflets have been produced to promote better understanding of the effect of the legislation.
48. An underlying problem with the access / occupiers' liability issue in Northern Ireland is the fact that in some upland areas public access has never been formalised but exists on a de facto basis. Landowners fear that by agreeing to formalise this de facto access they would increase their level of liability. In fact the opposite is the case.
49. The DFP review revealed that where de facto access exists, there is uncertainty as to whether walkers would be viewed by a court as visitors (to whom a higher duty of care is owed by the landowner) or as trespassers (to whom a lower duty of care applies). Thus a regime of de facto access potentially exposes a landowner to a higher level of liability. If landowners were to formalise the access by entering into an access agreement under the Access to the Countryside Order, they would derive the following benefits. Firstly, they would be entitled to a modest payment in return for making the agreement, and secondly, and possibly of more importance, they would secure a lowering of their liability. This is because the legislation makes it clear that anyone entering their land under an access agreement is not deemed a visitor and is therefore owed a level of care no higher than that owed by a trespasser.
50. It is considered therefore that greater use of the provisions in the Access Order provides a way forward. It would not only give walkers greater confidence about where they are entitled to walk, but also give landowners some financial reward together with a reduced legal liability.

1. What are your views on the proposed aims of national parks?
2. What are your views on the proposed criteria for identifying areas that may be suitable as national parks?
3. What are your views on the proposed arrangements for consulting on a proposal to designate a specific area as a national park?
4. What are your views on the proposed management framework arrangements for national parks?
5. What are your views on the proposed duties, functions and powers of a national park management body?
6. What are your views on the proposed role of a national park management body in planning matters?
7. What are your views on the governance options?
8. What are your views on the proposed constitution of a national park management body?
9. Do you share the Department's analysis in the Partial RIA that national parks will have little or no negative impact?
10. Are there any other comments which you wish to make about the Department's proposals?



Department of the
Environment
www.doeni.gov.uk

White Paper on Proposed Enabling Legislation for National Parks

March 2011

1. This paper sets out the Department of the Environment's proposals for taking forward new enabling legislation for national parks in Northern Ireland. The paper sets out the broad principles that the Department will seek to follow. However, some of the policy detail needs to be explored further in consultation with key stakeholders before draft legislation is developed.
2. The creation of a national park in Northern Ireland will be a two-stage process. The first stage is to put in place enabling legislation that will allow for the creation of national parks. The second stage will be a designation order to create a national park within a given area.

Background – The Evolution of The National Park Concept

3. Historically, in other parts of the UK and beyond, the term 'national park' has been a global brand used to describe different models of protected landscape areas. These areas range from vast, uninhabited wildernesses in the United States of America to smaller, populated areas in the UK where the landscape is largely a product of traditional farming practices.
4. In more recent times, with the introduction of Scottish national park legislation and the updating of comparable English legislation, the UK national park concept has developed considerably. There is now a recognised and growing desire to sustain viable communities within designated parks and a move to adopt a more balanced approach to ensure that social and economic aims are considered alongside the environmental agenda. The parks must facilitate and support sustainable economic activity and development. National parks are therefore places which set an example of how to integrate the rural economy with the proper protection of natural heritage and secure sustainable development. Annex A charts significant developments in the history of UK national parks.
5. The Northern Ireland landscape, with its large number of relatively small farms and numerous single dwellings in the countryside, is quite different to other parts of the UK. This stems from the history of land ownership on the island of Ireland and from the close-knit rural communities and associated strong family bonds to the land, which is generally handed down from generation to generation. Any Northern Ireland national park model needs to take account of this unique situation and to recognise that local involvement and strong community support is crucial to decision making. A Northern Ireland model also needs to be different to that of the Republic of Ireland which is based on state ownership of national park land.

Current Legislative Provision in Northern Ireland

6. The existing Nature Conservation and Amenity Lands (NI) Order 1985 allows for the designation of a national park. It is a very broad designation provision, geared solely to landscape protection and promoting public enjoyment of the area. Taking into account current thinking on what a national park should deliver, it is considered outdated.

7. Notably, current legislative provisions **fail** to:
 - embrace the principles of sustainable development;
 - take account of engaging communities;
 - provide a sound legislative basis for integrated national park management;
 - provide for the machinery and resources required to promote a national park and support its communities;
 - identify community well-being as an aim for Northern Ireland national parks;
 - allow for the empowerment of local rural communities so that they can have a say in the protection, management and development of their landscape; and
 - make a clear policy distinction between provision for national parks and Areas of Outstanding Natural Beauty in terms of management, resource provision and local accountability.
8. Current legislation is not therefore considered fit for purpose, and it is unlikely to provide a sustainable future for any potential national park.

Why do we need a National Park?

9. A key argument for national parks in Northern Ireland is based on the need to grow the economic opportunities of our most cherished landscapes in a managed way that conserves and enhances them and their communities. There is a need for national parks to boost tourism, to help Northern Ireland compete with and complement visitor attractions in the Republic of Ireland, and to contribute to economic growth generally. National park designation would increase focus and marketing opportunities for tourism in an international context. This would increase visitor numbers and spend in any designated area, to the benefit of local businesses and the facilitation of rural diversification.
10. In addition, some of our iconic landscapes suffer from unmanaged visitor pressures during certain times of the year, which leads to problems for local infrastructure, erosion of landscapes and difficulties for landowners. Designation would help to address these issues and would also facilitate conservation and enhancement of ecosystems, so that these landscapes remain attractive to visitors and make a positive contribution to the livelihoods and welfare of the people who live and work in and around them. The structured framework provided by a national park would ensure a managed and living landscape that can benefit future generations of local people and visitors alike. Furthermore, the resulting long-term commitment from Government would help to promote and support sustainable communities within the park area.

Strategic Fit

11. The national parks initiative sits comfortably within a number of Northern Ireland's policy strategies. The Regional Development Strategy 'Shaping Our Future' talks about exploring the potential for the establishment of one or more national parks where there is high landscape quality, significant recreation and tourism use or potential, the local community is in favour and an acceptable model can be found. The subsequent Sustainable Development Strategy 'First Steps Towards Sustainability' contains a specific target relating to the introduction of new national parks enabling legislation. Both these strategies are under review at present.
12. The initiative would also fit well with, and assist the delivery of, other major Northern Ireland strategies. For example, a national park would be concerned with developing measures to reverse biodiversity loss by maintaining and enhancing existing habitats, thus helping with delivery of the Northern Ireland Biodiversity Strategy. A national park would also contribute to the Northern Ireland Tourist Board's Tourism Strategy with the development and promotion of its area as a world-class quality visitor destination.
13. A national park would also assist rural development by promoting the long-term viability of its rural communities, thus adding value to DARD's Rural Strategy 2007-2013, the development of the Rural White Paper and the OFMDFM Anti-Poverty and Social Inclusion Strategy 2005.
14. Importantly, the initiative can be expected to produce significant economic benefits, and these are discussed later in the paper.

What Value Will National Park Designation Add?

15. National park status will give a chosen area a number of advantages including:
 - statutory assurance of additional and ongoing dedicated funding for integrated management designed to promote both economic and social well-being and environmental conservation / enhancement;
 - internationally important tourism status; and
 - a marketing advantage in terms of potential for branding of produce and for attracting new investment.
16. National park management would complement existing DARD-driven rural development, agricultural support and agri-environment programmes. It would add value to existing public expenditure streams by ensuring a co-ordinated and integrated approach, by promoting the area and by facilitating innovation.
17. On the environmental front for example, a park management body might provide financial incentives for activities not covered by existing support mechanisms, or 'top up' mainstream grant aid where it is desirable to further incentivise a particular activity that would help to achieve the environmental objectives of the park.

18. On the economic/social front, a park management body could for example follow the practice of some GB national parks and create a community enterprise team which would be proactive in assisting park dwellers across a wide range of subject areas. That assistance might be simply advice about accessing funding elsewhere or it might be in the form of grant aid for a specific project for which funding would not otherwise be available. GB parks also provide help with business start-ups, either in the form of advice or actual help with the preparation of business plans.
19. An interesting example of innovation in Northumberland National Park is its 'Traditional Boundaries, Traditional Skills' programme run by the park management body which takes ten local people off the unemployment register each year for a twelve-month period to train them in dry stone walling and hedge laying skills. Some of these trainees have then gone on to form small businesses.

Economic Impact

20. There is evidence to suggest that establishing national parks in Northern Ireland would assist with the delivery of the top PfG priority of growing the economy. For example, the 2006 Council for National Parks report "Prosperity and Protection" which examines the economic impact of national parks in the Yorkshire and Humber region, provides robust evidence that prosperity and protection can indeed go hand in hand. The study reveals that businesses in the parks and in towns nearby benefit from the quality of the protected landscapes and from the park designation itself. It suggests that the parks' businesses generate £1.8 billion in sales annually, supporting over 34,000 jobs and around £576m of gross value added. Visitors to the parks are estimated to spend about £400m annually within them and £260m in the rest of Yorkshire and Humber. The total visitor spend of £660m is estimated to support 12,000 jobs.
21. The economic growth experienced in UK parks is not confined to the rather obvious sectors like green tourism, but it also extends to those like land management, food production, IT, retail and small-scale manufacturing.
22. Further evidence comes from the 2001-2006 Welsh study "Valuing our Environment: Economic Impact of the National Parks of Wales" which was commissioned by the National Trust Wales, Countryside Council for Wales, Welsh Assembly Government and other partners. This study found that the three Welsh national parks support nearly 12,000 jobs, produce total income of £177m and generate £205m GDP. The parks are icons for tourism inside and outside the park boundaries. They provide a strong brand image for Welsh goods and services, and they support not only their own local economies but also the economy of Wales as a whole.
23. Closer to home, independent research¹ into the possible tourism impact of a Northern Ireland national park was commissioned by the Northern Ireland Tourist Board and Mourne Heritage Trust in 2006. The study indicates that, ten years on from designation, a park could be generating as

¹Tourism in Mourne: Current and Potential Economic Impact – Colin Buchanan & Partners Ltd. - 2006

much as an additional £81m per annum in tourism revenue and supporting an extra 4,700 jobs in the park area and its surrounding districts.

24. The Mourne study found that there was no precise data available on visitor numbers before and after designation for a comparable national park, but the research conducted did identify important trends in the case studies examined. For example, in the French Regional Nature Park in Brenne which was designated in 1989, visitor numbers to the park's main gateway and orientation centre increased dramatically from 5,000 in 1991 to 78,000 in 2004. French Regional Nature Parks are not national parks but provide an interesting parallel as they were established as a mechanism to conserve cultural landscapes. Their aims include protecting heritage through suitable management of natural environments and landscapes, enhancing economic, social and cultural development, and welcoming, educating and informing visitors.
25. The Swedish national park at Fulufjället was another case study examined by the Mourne study. Designated in 2002, 53,000 people visited it in the summer of 2003 representing an increase of 40% over the visitor numbers for 2001.

Will National Park Designation Impose Restrictions on Agriculture and Fishing?

26. Farming and fishing communities can be assured that national park designation would not result in the imposition of additional restrictions on agricultural and fishing practices. The model of national park that is being proposed for Northern Ireland is not a regulatory regime but a facilitating and enabling framework that will encourage enhancement of the special landscape and promote the well-being of its communities. The focus of a park management body's work would therefore be on the creation of opportunities for betterment of the area.

Proposed Aims of a Northern Ireland National Park

27. It is suggested that a Northern Ireland national park would have four aims. These are set out below, together with supporting rationale.

I. Promotion of sustainable economic and social development of the area's communities.

28. Northern Ireland's most special landscapes and/or seascapes are the homes and workplaces of many thousands of people, and the continued existence of vibrant communities is vital to future landscape maintenance. These communities are often being challenged by a range of economic and social changes and there is a need to encourage and promote economic diversification to assist communities to maintain their populations and local services such as schools, post offices and shops.

29. Responses to these challenges are being developed by strategies such as the development of the Executive's Rural White Paper and the review of the Rural Development Strategy, and it is important that the national parks initiative works in synergy with, and adds value to, these developments. National park status would add value to an area's economic and social opportunities by giving it an internationally important profile which would attract more visitors and investment, and provide a branding opportunity for the area's produce.

30.

II. Conservation and enhancement of the natural, cultural and built heritage of the area.

31. Northern Ireland has a number of areas of landscape and/or seascape of exceptional natural beauty. They contain important wildlife species, habitats and geodiversity, many of which have been recognised as being of national and international importance. But they are also living and working landscapes, and over the centuries their natural beauty has been moulded by the influence of human activity. Their character is reflected in local traditions which have influenced farming, forestry, quarrying and other activities, as well as management practices in the marine environment such as aquaculture, fishing and recreation. It is also reflected in the local building materials and vernacular style, monuments and landscape, often of archaeological or historical significance, and in the words, music, customs, crafts and art which mark the individual characteristics of the area.

32. Just as the influence of man can and has been positive, so it can be detrimental to landscape quality too. In some cases there is a need to ensure that an area's features, character and culture are maintained and enhanced for future generations.

33. Special landscapes may include some sites that already have statutory protection under domestic and European law. However, such regimes do not provide a holistic approach to landscape enhancement and community needs. A national park would provide a practical focus on conservation and enhancement of the natural heritage where it is agreed appropriate, within the resources available to any management body. However, a park would not impose additional regulatory burdens.

III. Promotion of understanding and enjoyment (including enjoyment in the form of recreation) of the special qualities of the area by the public.

34. Northern Ireland has diverse and attractive land and seascapes, some of which draw large numbers of people. People visit these areas to enjoy and learn about the countryside, its seascapes, its settlements, its lakes, loughs and rivers. Visitors come to escape day-to-day pressures and to experience the sense of freedom, challenge, inspiration and enrichment which is derived from the distinctive character of an area, its people and its culture. The public health benefits and sense of well-being associated with increased countryside recreation are well documented and feature in many cross-cutting initiatives and strategies within government, including DCAL's recently published strategy for sport and physical recreation. In addition, there are important messages to be communicated about wider environmental and social issues, such as climate change and the need to pursue more sustainable ways of living.
35. While there are areas which are well-visited and have a number of features of interest, there is still a need to promote their importance both nationally and further afield. These features would be a focus for promoting quality services and growing tourism. This would have to be undertaken in a sustainable manner to avoid adverse impacts and to ensure that the needs of the local community are met. In turn, this enhanced level of activity would assist the local community to diversify its economic base by providing amenities such as accommodation, camp sites, car parking and refreshments. Opportunities for bird watching, angling, guided tours, boat trips for watching marine life and other water-based activities could also be developed to cater for the growing trend in eco-tourism

IV. Promotion of the sustainable use of the natural resources of the area.

36. Sustainable use of natural resources is at the heart of the UK national park concept. Sustainability is about living within the capacity of the environment and natural resources and ensuring that the needs of people alive today are met without compromising the ability of future generations to meet their own needs.
37. The major challenge that sustainability presents is increasingly understood and evident. For example, global climate change, collapsing marine fisheries, increasing demand on minerals and other natural resources, are all pressing current issues which impact globally and locally.
38. In the UK national parks are now expected to be in the vanguard in terms of promoting ways to live within environmental limits and to address climate change. In addition to the traditional use of an area's resources for recreation such as hiking, boating and cycling, thinking has expanded to harness other potential uses of its natural resources. To this end, UK parks are setting examples for the rest of society in areas such as renewable energy promotion, green transport, hydro-electric and biomass projects, low carbon farming, eco-tourism, community level recycling and rainwater harvesting. It is suggested that a Northern Ireland national park might fulfil a similar role.

Criteria for Identifying Potential National Parks

39. It is suggested that criteria for national parks would flow from the park aims and would need to be predicated on landscape quality. However, it is also recognised that not every special landscape needs to become a national park. It is further suggested that in order to be considered for national park designation an area should meet all of the following criteria:

Special Landscape

40. It is suggested that the first criterion for identifying national parks would be based on the fact that the area has a special quality in terms of its landscape/seascape, settlements, biodiversity, built heritage and culture. This special quality would be associated with attributes such as natural beauty, sense of place and national importance. Thus the first criterion would be **'that the area is of special importance because of its natural heritage or the combination of its natural and cultural heritage'**.

Cohesiveness

41. Special landscapes/seascapes can have a particular character or identity which extends beyond the bounds of the core area of special natural beauty. In other words there may be a market town, a port, or perhaps an area that has become degraded to some degree, but which in terms of its geographical or cultural identity is linked to the special area. It would therefore be useful to have a criterion that allows for some boundary flexibility and ensures that an area is coherent in social, cultural and economic terms. Thus a second criterion would be along the lines **'that the area has a distinctive character and coherent identity'**.

Special Pressures

42. Special landscapes/seascapes may be experiencing a number of pressures. For example, with Northern Ireland attracting greater numbers of visitors each year, there are growing pressures on our road network and other infrastructure, especially in the summer months. Unmanaged visitor pressure can also lead to landscape erosion and problems for landowners such as litter, trespass and property damage. Attractive landscapes can also come under pressure in relation to demand for second homes. This can create problems in terms of development pressure/urbanisation, escalating property prices, lack of affordable housing for local people and, in extreme cases and over time, breakdown of local community structures.
43. The integrated management approach associated with the national park philosophy has the capacity to help address the sort of pressures described above. It is suggested therefore that a third criterion is **'that designating the area as a national park would help it to meet the**

special pressures on the area. This criterion would help to distinguish between candidates for national park designation and other special landscapes that could be sustained by more modest designation and management arrangements.

Recreation, Enjoyment, Education and Understanding

44. It is suggested that a candidate national park would be expected to be a national asset in terms of encouraging tourism, recreation, public enjoyment and understanding of the environment. Some areas already attract significant levels of visitors for this reason – for example, the Giants Causeway/Antrim Coast and Glens, Fermanagh Lakelands and the Mournes.
45. Consideration needs to be given to the potential added value which national park status would bring to an area in terms of facilitating improved recreation, enjoyment and understanding. Consideration also needs to be given to whether the area has a critical mass in terms of diversity of visitor interest and appeal.
46. It is therefore felt that a fourth criterion should be **‘that the area affords opportunity for recreation, enjoyment, education and understanding’**.

Need for Clear and Rational Process

47. A clear and rational process is needed to ensure:
 - **Credibility** – that any area proposed for designation is coherent, of appropriate quality, and has the right characteristics to be considered as a national park.
 - **Fairness** – that any proposals for designation via the subordinate legislation process are subjected to a thorough, extensive and transparent process of public consultation and debate and ultimately agreed.
 - **Objectivity** – that any proposals are rooted in factual material, uncoloured by emotions, subjective opinions or vested interests.
 - **Robustness** – that the entire process of designation should be open to detailed scrutiny and challenge, and if appropriate at a public inquiry.

Objective Landscape Evaluation

48. The expectation is that the process would need to begin with the commissioning of independent and objective evaluation of all of Northern Ireland’s landscapes to identify areas that meet all the criteria. This is a major piece of work that would provide a rational basis for making a formal proposal for a national park designation in a specific area.
49. The study might list the eligible candidates for national park designation and articulate the merits

of each. This would be a transparent process, and there is the option of publishing this work to gauge public reaction before the Executive commits to a specific proposal.

Designation Process

50. It is envisaged that a formal national park proposal could set out in general terms each area which it is proposed should be designated as a national park; the functions which it is proposed the park management body should exercise; and the likely costs of the body in exercising those functions. Such a proposal would need to be accompanied by an appropriate and comprehensive range of impact assessments. The proposal would be exposed to an extensive consultation process with all stakeholders, the outcome of which would be published and laid before the Assembly.
51. It is suggested that it would also be helpful for the legislation to make it clear that there would be a facility for a public inquiry in the event of significant objection to the proposal. It is envisaged that this would follow the pattern of the sort of public inquiry that would be held in relation to a major planning decision. It could reduce the prospect of legal proceedings from those who either do not want a national park in the area proposed or who are aggrieved that their area was not selected. However, it does not rule out the possibility of a complainant seeking a judicial review of any public inquiry decision.

Designation Order

52. The expectation is that, in the light of the outcome of the public consultation and any inquiry that may be held, the Executive would decide whether or not to proceed with the designation process. The designation order process would, it is envisaged, take the form of subordinate legislation and there would therefore be full public consultation on a draft Designation Order. In other words, there would be a specific piece of subordinate legislation for each national park setting out in detail its geographic limit.
53. The process of making a designation order could include the following key steps:
 - Executive agreement on the final proposed boundaries of such a park;
 - circulation of the draft order to every district council where any part of that council area is within the boundary identified in the order for designation as a national park;
 - circulation of the draft order to those who appear to the Department to be representative of the interests of those who live, work or operate a business in the proposed national park area;
 - extensive advertising of the proposals in the Belfast Telegraph, the News Letter and the Irish News, as well as in relevant local newspapers; and
 - a 12-week public consultation period.

Executive Role

54. For a number of reasons it is suggested that the selection of an area for a proposed national park designation needs to be an Executive rather than a Ministerial decision. Firstly, the proposed purpose and aims of national parks are cross cutting. National parks impinge on the interests of not only DOE but also DARD, DETI, DSD, DCAL, DRD, DHSSPS, OFMDFM and DFP. Secondly, the establishment of a national park would have implications for the Programme for Government and would necessitate agreement on prioritisation, as a national park would require additional funds to be allocated on an ongoing basis. Thirdly, the creation of a national park would not only be a significant new initiative; it is also likely to be controversial. The experience with the Direct Rule project to designate a Mourne National Park, and indeed experience in Great Britain with national park proposals generally, demonstrates that any proposal to designate a specific park anywhere in Northern Ireland is likely to be met with a mixture of both support and opposition.
55. It is envisaged therefore that it would be appropriate for an Executive Subcommittee – comprising the Ministers of the Departments listed above – to be set up to oversee the selection process. The entire community could have confidence in a national park proposal that had been selected and approved by the Executive acting collectively.

Governance Arrangements

Management

56. The overarching requirement for any national park to operate successfully is to have in place integrated and sustained management delivered by a competent management body with adequate funding. For integrated management to work properly there needs to be a clear and unfettered focus by the management body to work towards delivery of the park's aims. This can only be achieved if the management body has a long-term commitment from government to support it.

Possible duties, functions and powers of management body

57. It would be important for any national park management body to provide the leadership needed to bring together all relevant organisations and individuals to focus on the park area. This would allow it to develop the park in a holistic way in accordance with the aims set out in the primary legislation and with wider government policy and other requirements. It would be necessary for the body to engage all relevant players in developing a long-term vision and in drawing up a statutory management plan for the short to medium term, showing the steps to be taken towards that vision and how each agency has committed to contribute. It is suggested that before its adoption the management plan would have to be approved by the Executive. Progress with its implementation would be monitored and an annual report made to Ministers. It is further

suggested that a statutory duty would be placed on all public bodies to have regard to the plan.

58. It is not envisaged that the body would take over or duplicate the role or responsibilities of any existing organisation or provide services that could be provided by the private sector.

Planning matters

59. The agenda for building in the countryside has already been set by PPS 21. New national park legislation would not disturb this, and a park management body would not exercise any planning powers in its own right. However, it is suggested that the body could be given an influencing role by being made a statutory consultee in the planning process. It is envisaged that a management body could assist with efforts to ensure that the design of future development is sensitive to a park's natural beauty. It is also envisaged that the national park management plan would provide the overarching vision for the future of the park and that the relevant planning authority would have regard to this when preparing future development plans.
60. A national park management body would not be 'anti-development' in its views. The expectation is that it would seek to balance the needs of communities with the needs of the environment by pursuing a goal of sustainable development. Importantly, local people would be fully integrated into the body's decision-making process.

Marine matters

61. While the function of English and Welsh national parks has a totally terrestrial focus, Scottish national park legislation allows for the inclusion of marine areas. In view of its marine assets, it is suggested that it may be useful for Northern Ireland to have the ability to designate national parks that include marine areas as well as land.

Governance Options

62. In theory, there is a wide range of governance options. All of the studies and discussions undertaken to date have highlighted the importance of local decision making and this will be a key factor in determining which option is most appropriate. The full range of governance options will be explored through public consultation, but at this stage two options stand out as providing a substantial level of local input. A local independent body for each park, or a joint governance committee comprising representatives of relevant district councils together with the Department.
63. Whichever option is chosen, the governing board of any national park would need to be structured to ensure that both the national and local interests have effective representation.

Estimated Costs and Timing

64. While the costs of a national park would vary according to the governance option selected, they could be up to £3m per annum. However, research indicates that such costs would be more than offset by the economic benefits that would ultimately accrue. The economic impact of national parks is discussed earlier in this paper.
65. It is envisaged that new national parks enabling legislation could not be in place until 2012 at the earliest. The subsequent process to designate a specific area is likely to take several more years.

Conclusion

66. Northern Ireland has a number of unique and spectacular landscapes and areas of interest which would warrant national park status. A national park is regarded as an area to be managed, visited and enjoyed, by its national population and to be marketed internationally as a natural heritage asset. Northern Ireland has the opportunity to promote the sustainable economic, social and environmental benefits which modern national parks bring to an area, and indirectly to the province as a whole.
67. The concept of national parks has evolved greatly since legislation was first introduced in England and Wales in the late 1940s. Taking advantage of the experience of national parks in the rest of the UK and farther afield, this White Paper sets out the Department's policies in relation to a framework for national parks which would be relevant to Northern Ireland's needs. However, to develop legislative proposals, substantial consultation with stakeholders and discussions with groups and individuals will be required.
68. It is intended to take this issue forward as a Departmental commitment in the new Assembly's legislative programme.

Significant Developments in the History of UK National Parks

The English 1949 Act

The National Parks and Access to the Countryside Act 1949 (NPACA) established National Parks within the UK. It was described by Lewis Silkin, the Minister of Town and Country Planning of the time, as “the most exciting Act of the post-war Parliament”. The nation was to have its Parks, and their purposes were to preserve and enhance natural beauty and to promote enjoyment by the public.

Under NPACA the first ten National Parks were designated starting with the Peak District in 1951. By the end of the decade the Lake District, Snowdonia, Dartmoor, Pembrokeshire Coast, North York Moors, Yorkshire Dales, Exmoor, Northumberland and Brecon Beacons National Parks had also been established. Parks tended to be selected because of their ‘wilderness’ properties.

The English 1995 Act

The 1995 Environment Act was the first piece of national park legislation to refer to the well-being of a park’s communities. The twin aims of parks, i.e. the preservation and enhancement of natural beauty and the promotion of public enjoyment, continued to be the main objectives, but now parks were required, as they pursued these aims, to do so in ways which would also ‘foster the economic and social well-being of local communities within the National Park. However, they were specifically charged with doing this ‘without incurring significant expenditure.’ This curious constraint was to lead to problems later and subsequent legislative reform (see below).

English initiative (1997) to have more parks nearer large centres of population

The late 1990s witnessed a political desire to create more national parks in England but in areas that were closer to major centres of population. This occasioned a re-interpretation of the English criteria for national park designation and ultimately led to the designation of the New Forest (2005) and South Downs (2010).

The Scottish 2000 Act

The National Parks (Scotland) Act 2000 took the English model and developed it further by putting sustainable development at its heart. To the twin aims of the English model were added the ‘promotion of the sustainable economic and social development of the area’s communities’ and the ‘promotion of sustainable use of the natural resources of the area.’ Importantly these four aims are of equal importance. Under this Act Scotland designated two parks, Loch Lomond & the Trossachs (2002) and the Cairngorms (2003).

The English 2006 Act

The Natural Environment and Rural Communities Act 2006 removed the financial constraint on parks’ spending on fostering the economic and social well-being of park communities. The Act stopped short, however, of altering the aims of English parks; there are still only two.

English updated policy guidance on national parks (2010)

This DEFRA circular contains a vision for English parks. By 2030 they will be places where there are thriving, living, working landscapes which inspire visitors and local communities to live within environmental limits and to tackle climate change. They will be places where sustainable development can be seen in action and where renewable energy, sustainable agriculture, low carbon transport and healthy, prosperous communities have long been the norm. Wildlife flourishes and habitats are maintained, restored and expanded. Woodland cover has increased and all woodlands are sustainably managed with the right trees in the right places. Landscapes and habitats are managed to create resilience and enable adaptation. Everyone can discover the rich variety of England's natural and historic environment and can have the chance to value them as places for escape, adventure, enjoyment, inspiration and reflection and a source of national pride and identity. They will be recognised as fundamental to national prosperity and well-being.

DEFRA encourages park authorities and all other bodies with an influence on the management of these special areas to work towards the achievement of this vision. The statutory purposes and the duty of the park authorities remain relevant, and this circular aims to encapsulate the purposes and duty in a modern vision.

Partial Regulatory Impact Assessment

1. Introduction

This Regulatory Impact Assessment (RIA) is an initial attempt to describe the costs and benefits associated with proposals for new enabling legislation to allow for the establishment of national parks in Northern Ireland. No decisions have been taken on the preferred location for the first national park so the RIA is at a relatively early stage.

The RIA will be refined and updated following completion of the consultation and a final RIA will be produced when policy decisions have been finalised and legislative proposals prepared.

The RIA is open to comments, improvements and corrections by any interested party. Comments are welcome on all aspects and, in particular, on the possible costs arising from the establishment of national parks.

2. Purpose and Intended Effect of Measure

(i) The objective.

The policy objective behind the proposal for new national parks enabling legislation is twofold. First, there is the objective concerned with the opening up of opportunities to stimulate tourism and economic activity generally by according internationally recognised status to special landscapes. National park designations have proven elsewhere to be powerful engines of economic growth, capable of facilitating both tourism development and rural diversification. Second, there is a policy objective of securing a sustainable future for Northern Ireland's most pressurised cherished landscapes and their communities. It is intended that the proposal will facilitate not only the conservation and enhancement of the natural, built and cultural heritage of these special landscapes but also the economic and social development of those areas' communities.

(ii) The background

Northern Ireland's existing national parks legislation is generally regarded as inadequate for the purpose of securing the integrated management which is necessary for addressing the problems that some areas are facing. These problems include visitor and development pressures, problems associated with lack of land and access management, and issues around the vulnerability of rural communities.

Because Northern Ireland has no national parks, those areas which might aspire to national park status are, in the main, already designated as Areas of Outstanding Natural Beauty (AONB). This designation does not have an international appeal to equal that of a national park, nor is it designed to bring to bear on an area the level of public investment that a national park merits.

(iii) Risk assessment

The risk that the regulation is addressing centres on the threat of degradation of the qualities of our most outstanding environmental assets and also on the danger that, by not giving them the international recognition they deserve, we are depriving them of opportunities to make the most of their economic potential.

Currently, management of such areas is usually entrusted to charitable trusts which have no statutory management powers and limited resources. Experience has shown that this voluntary approach is not nearly enough to cope with the special needs of these areas. GB experience with the highly pressurised attractive landscapes in its national parks demonstrates that the solution to guaranteeing their sustainability lies in the production of a statutory management plan which not only takes account of the need to protect the environment but also embraces the need to promote the economic and social well-being of the area's communities.

3. Options

Option 1

Do nothing. Candidate national park areas would not be able to aspire to the higher tier of designation and to the associated integrated management and significantly enhanced level of funding which they need. Continuation of the status quo would therefore see charitable trusts striving to manage our most sensitive landscapes with neither the statutory powers nor the budget needed to secure sustainable development. The result would be continuing degradation of these important landscape assets and failure to capitalise on the significant economic benefits associated with national parks.

Option 2

Designate national parks under the existing legislation. As the existing legislation does not distinguish between AONBs and national parks in terms of their quality, needs or management the outcome would amount to little more than a change of name. This option could actually exacerbate the current situation as the national park label would bring more visitor pressure to bear but not provide for the necessary improvements in management and resourcing to cope with that influx.

Option 3

Introduce new enabling legislation for national parks that would meet the policy objectives outlined above. There would be provision for a park management body that would promote the area and produce a statutory management plan which would effectively be a blueprint for sustainable development. Other statutory bodies would be required to have due regard to the plan and the aims of the park. It is not proposed that the management body would exercise planning powers but it would have the capacity to deliver properly resourced integrated management.

4. Benefits

Option 1: No additional benefits would be likely to arise as a direct result of pursuing this option as this is the do nothing option. There is a possibility that some of the potential economic and social benefits could be achieved indirectly on a more limited scale if more sector-specific initiatives are pursued independently, but that would not be guaranteed and the wider benefits of more holistic and sustainable management through delivery of the park plan would not be achieved.

Option 2: A benefit of this option is that tourism would be boosted in the short term by virtue of having the national park label. However, this growth would not be sustainable in the absence of the integrated management and resources to deal with the increased visitor pressure.

Option 3: The establishment of a national park management body would create local employment opportunities, and the incomes associated with these new jobs could contribute to the strength of the local economy. It is possible, depending on the location of the first national park, that not all the new jobs would represent net increases in employment if it is the case that the national park management body is taking the place of an existing AONB management body.

Establishment of a national park would also be expected to lead to significant tourism growth in the chosen area, particularly for hotels and catering, retailers, museums and other visitor attractions. If the national park included an island or islands within the boundary, the increased number of visitors could lead to greater numbers of passengers on ferries, thus generating higher income and contributing to the viability and profitability of existing routes.

The benefits to tourism and associated sectors could also be felt for longer periods throughout the calendar year than the key visitor seasons at present. Increased tourism could also benefit local traditional industries such as fisheries and food processing as well as newer industries like aquaculture, as local demand through restaurants and other catering establishments is increased for premium products such as shellfish. These sectors could also exploit demand for green products through development of new branding opportunities to associate their produce with the national park, with the potential for these to facilitate expansion into new markets.

The development of a national park plan could lead to clearer information for local businesses on their operating environment as well as better signposting and assistance for people wishing to start up new businesses. Research into national parks in Great Britain indicates that properly managed and resourced national parks create economic growth and help businesses to prosper.

The national park designation and the associated development of a national park plan would also better ensure that the natural and cultural heritage of the area is safeguarded for the nation and future generations.

The Department welcomes representations on the potential benefits to assist with completion of the RIA.

Business sectors affected

The main beneficiaries of national park designation would be businesses directly or indirectly associated with the tourism industry, but there are also opportunities for local food producers/retailers to benefit from trading in national park branded produce. A national park could also be expected to provide opportunities for landowners to diversify farm-based activities, and to obtain grant aid for activities that enhance biodiversity and the landscape generally. Views on the implications for any other business sectors would be welcome.

5. Costs

(i) Compliance costs

It is proposed that the park management body would not be a regulatory body but would be an enabling and facilitating organisation. Thus the Department's initial conclusion is that farms and other sectors of business would have no costs to meet in terms of the compliance costs of additional restrictions or regulations.

(ii) Other costs

Under Option 1 – the do nothing option – there would be environmental costs associated with continuing degradation. It is difficult to put a figure on these costs but they are potentially significant as erosion of the landscape and the quality of the visitor experience could, over time, impact adversely on tourism revenue and the Northern Ireland economy generally.

Under Option 2 the additional unmanaged visitor pressure could lead to even higher environmental costs than those identified under Option 1.

Under Option 3 it is possible that some individual businesses may be affected in those sectors of the local economy in which restructuring could take place to exploit the new commercial opportunities arising from the establishment of a national park. It is difficult to be more certain about costs at this stage and views are invited from those who consider that they may be affected, but additional investments by some businesses in industries such as tourism to take advantage of new opportunities could lead to a reduction in competitiveness of other businesses. This would be likely to depend on the area selected for designation, and once a decision is taken on that a more detailed RIA would be produced as part of the consultation process.

(iii) Wider costs to society

A number of possible negative impacts of national park designation have been identified in research. For example, increased visitor numbers may lead to traffic congestion, greater pressure for access and recreation, and a possible increase in demand for second homes and associated rises in property prices. On the other hand, some would argue that likely candidate national park areas in Northern Ireland are already experiencing such pressures because of their natural beauty and a burgeoning tourism industry and that the creation of a properly resourced park management body would equip them to mitigate

these impacts. It is particularly difficult to be certain about such impacts in the absence of a specific park proposal, and the Department would be grateful if respondees are able to provide any further information on these issues.

As far as the voluntary sector is concerned, it is considered that the creation of national parks would have a largely positive impact. Park management bodies would be an additional source of funding for voluntary bodies engaged in activities that are conducive to the delivery of park aims. The only negative impact identified so far is that the creation of a statutory park management body could result in the winding up of any pre-existing voluntary sector management body. Any further information that the voluntary sector can provide would be gratefully received.

6. Monitoring and Review

It is proposed that the designation of any specific park in Northern Ireland would involve subordinate legislation and that the process of enacting such legislation would include detailed site-specific impact assessments. It is further proposed that, once established, specific national parks would be subject to a review of their effectiveness at least every five years.

7. Consultation

This proposal is being exposed to extensive public consultation.

8. Summary and Recommendation

The Department's current thinking is that the proposals would not add to the regulatory burden on business. They would provide a framework for securing a sustainable future for our most pressurised special landscapes and their communities and would also open up opportunities for significant economic benefit to the Northern Ireland economy.

Confidentiality of Consultation

The Freedom of Information Act gives the public the right of access to any information held by a public authority, namely, the Department in this case. This right of access to information includes information provided in response to a consultation. The Department cannot automatically consider as confidential information supplied to it in response to a consultation. However, it does have the responsibility to decide whether any information provided by you in response to this consultation, including information about your identity should be made public or be treated as confidential. If you do not wish information about your identity to be made public please include an explanation in your response. This means that information provided by you in response to the consultation is unlikely to be treated as confidential, except in very particular circumstances. The Lord Chancellor's Code of Practice on the Freedom of Information Act provides that:

- The Department should only accept information from third parties in confidence if it is necessary to obtain the information in connection with the exercise of any Department's functions and it would not otherwise be provided;
- The Department should not agree to hold information received from third parties 'in confidence' which is not confidential in nature;
- Acceptance by the Department of confidentiality provisions must be for good reasons, capable of being justified to the Information Commissioner.

For further information about confidentiality of responses please contact the Information Commissioner's Office or see web site at:

www.informationcommissioner.gov.uk

DOE Section 75 Equality of Opportunity Screening Analysis Form

Section 1

Background

The Legal Background

Under section 75 of the Northern Ireland Act 1998, the Department is required to have due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

The main groups within each of the nine categories, highlighted above, are identified at the end of this form.

In addition, without prejudice to its obligations above, the Department is also required, in carrying out its functions relating to Northern Ireland, to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinion or racial group.

Section 2

2.1 Please insert below a brief description of the policy/legislation, including the title and all the main aims and objectives

Title **New National Parks enabling legislation**

Aims : The new legislation would aim to address a number of shortcomings with existing legislation. It would for example define the difference between an AONB designation and a national park designation and provide a statutory basis for the integrated management and investment of resources that are needed by protected landscapes which are under intense visitor and development pressure. Essentially the objective is to secure a sustainable future for Northern Ireland's most pressurised cherished landscapes.

2.2 On whom will the policies / legislation impact? Please specify

The policy will impact on Northern Ireland society as a whole either directly or indirectly. People living within areas that are designated as national parks will see increased investment in those areas' landscapes, biodiversity and communities. Indirectly, people living outside the designated areas will also benefit as the economic benefits of national parks will be experienced beyond park boundaries and will ultimately impact positively on the Northern Ireland economy as a whole.

2.3 Who is responsible for (a) devising and (b) delivering the policy, eg is it DOE, a Whitehall Department or EU? What is the relationship and have they considered this issue and any equality issues?

- (a) DOE is responsible for devising the policy.
- (b) Delivery mechanisms will be determined in the wake of this consultation and may take the form of a local management body which could be either district council driven or a NDPB. Whatever management framework is chosen, DOE will be providing the funding and monitoring outputs and impacts. The establishment of a specific national park will be by means of subordinate legislation, a process which will include relevant impact assessments, including consideration of equality issues.

2.4 What linkages are there to other NI Departments/NDPBs in relation to this policy/ legislation?

There are linkages to DETI because of the close relationship between national parks and tourism, to DARD because of rural regeneration and diversification issues, to DCAL because of countryside recreation issues, and to DSD because of issues around economic and social well-being.

2.5 What data are available to facilitate the screening of this policy/ legislation?

The proposals contained in this consultation concern Northern Ireland-wide enabling provisions which are neither site-specific nor targeted at specific sectors of society. The question of availability of specific data for equality screening is therefore not relevant.

2.6 Is additional data required to facilitate screening? If so, give details of how and when it will be obtained.

No additional data is required.

Section 3 – Screening Analysis

3.1 Is there any indication or evidence of higher or lower participation or uptake by the following Section 75 groups?

	Yes	No
Religious belief		No
Political opinion		No
Racial group		No
Age		No
Marital status		No
Sexual orientation		No
Gender		No
Disability		No
Dependants		No

Please give details

There is no evidence that any of the particular groups is, or will be, more affected by these proposals than any other or that any particular group would be disproportionately affected by the policy proposals.

3.2 Is there any indication or evidence that any of the following Section 75 groups have different needs, experiences, issues and priorities in relation to this policy issue?

	Yes	No
Religious belief		No
Political opinion		No
Racial group		No
Age		No
Marital status		No
Sexual orientation		No
Gender		No
Disability		No
Dependants		No

Please give details

There is no evidence of this and no reason to suspect that any of the particular groups would gain any advantage, or be disadvantaged, by these policy proposals in terms of their particular needs or priorities.

3.3 Have consultations with the relevant representative organisations or individuals within any of the Section 75 categories, indicated that policies of this type create problems specific to them?

	Yes	No
Religious belief		No
Political opinion		No
Racial group		No
Age		No
Marital status		No
Sexual orientation		No
Gender		No
Disability		No
Dependants		No

Please give details of any consultations carried out, and any problems identified.

The Department will consult widely about the policy proposals, but the results of the consultation exercise are not expected to indicate that the policy proposals would particularly disadvantage any of the groups identified in Section 75, therefore the Department considers that equality issues do not arise.

3.4 Is there an opportunity to better promote equality of opportunity or community relations by altering the policy, or by working with others, in Government, or in the larger community in the context of this policy?

No

Please give details

No such opportunities have been identified. The policy proposals, by their nature, are considered neutral from an equality perspective.

- 3.5 It may be that a policy/legislation has a differential impact on a certain Section 75 group, as the policy has been developed to address an existing or historical inequality or disadvantage. If this is the case, please give details below:**

No such impact identified.

- 3.6 Please consider if there is any way of adapting the policy to promote better equality of opportunity or good relations.**

Please give details

None identified

Section 4

EQIA Recommendation

- 4.1 Full EQIA procedures should be carried out on policies considered to have significant implications for equality of opportunity. Please fill in the following grid in relation to the policy/legislation.**

Prioritisation Factors	Significant Impact	Moderate Impact	Low Impact
Social Need.			Yes
Effect on people's daily lives.			Yes
Effect on economic, social and human rights.			Yes
Strategic significance			Yes
Financial significance			Yes

Please give details

The policy proposals, by their nature, are considered neutral from an equality perspective.

- 4.2 In view of the considerations in Section 3 and 4 do you consider that this policy/legislation should be subject to a full EQIA? Please give reasons for your considerations. If you are unsure, please consult with affected groups and revisit the screening analysis accordingly.**

There is no evidence that any of the particular groups is, or will be, more affected by these proposals than any other or that any particular group would be disproportionately affected by the policy proposals.

- 4.3 If an EQIA is considered necessary please comment on the priority and timing in light of the factors in table 4.1.**

N/A

- 4.4 If an EQIA is considered necessary is any data required to carry it out/ensure effective monitoring?**

Please give details

N/A

Section 5

Endorsement

I can confirm that the proposed policy has been screened for equality of opportunity and good relations implications and has been screened out for equality impact assessment/requires a full equality impact assessment.

Signed: **Ken Bradley**

Agency/Division: Environment Policy Division

Date: July 2011

Main Groups Relevant to the Section 75 Categories	
Category	Main Groups
Religious belief	Protestants; Catholics; people of non-Christian faiths; people of no religious belief
Political opinion	Unionists generally; Nationalists generally; members/supporters of any political party
Racial Group	White people; Chinese; Irish Travellers; Indians; Pakistanis; Bangladeshis; Black Africans; Black Caribbean people; people with mixed ethnic group
Gender	Men (including boys); women (including girls); trans-gendered people
Marital status	Married people; unmarried people; divorced or separated people; widowed people
Age	For most purposes, the main categories are: children under 18, people aged between 18-65, and people over 65. However, the definition of age groups will need to be sensitive to the policy under consideration
"Persons with a disability"	Disability is defined as: A physical or mental impairment, which has a substantial and long-term adverse effect on a person's ability to carry out normal day-to-day activities as defined in Sections 1 and 2 and Schedules 1 and 2 of the Disability Discrimination Act 1995
"Persons with dependants"	Persons with personal responsibility for the care of a child; persons with personal responsibility for the care of a person with an incapacitating disability; persons with personal responsibility for the care of a dependant elderly person
Sexual orientation	Heterosexuals; bisexuals; gays; lesbians

Rural Proofing Statement

Rural proofing is a process to ensure that all relevant Government policies are carefully and objectively examined to assess whether or not they have a different impact in rural areas from that elsewhere, because of the particular circumstances of rural areas; and, where necessary, what policy adjustments might be made to reflect rural needs and in particular to ensure that, as far as possible, public services are accessible on a fair basis to the rural community.

Approximately 35% of the population of Northern Ireland lives in rural areas. The Northern Ireland Statistics and Research Agency have defined such areas as settlements with a population of less than 4,500 (according to the 2001 census).

With their emphasis on cherished landscapes, the Department's proposals for enabling legislation for national parks will, by their nature, impact disproportionately on rural areas. However, it is considered that there will be no negative impacts on rural areas. On the contrary, with the argument for national parks based on growing the economic opportunities of our most cherished landscapes in a managed way, the proposals are likely to have a wholly positive impact on rural areas.

The Department is fully committed to continuing engagement with stakeholders, and any responses received in relation to the formal public consultation will be carefully analysed. Any actions identified during the consultation process as having a differential impact in rural areas will be further considered in the policy development.

List of Consultees

Northern Ireland Assembly
MLAs
MEPs
Attorney General
North / South Ministerial Council, Joint Secretariat
Devolution and Legislation Division
Legislation & Parliamentary Unit
Departmental Equality Unit
The British Library, Legal Deposit Office
Bodleian Library, Oxford
University Library, Cambridge
National Library, Scotland
National Library, Wales
Library of Trinity College, Dublin
Library, Queens University Belfast
Northern Ireland Publications Resource
TSO Bibliographic Department
National Library of Ireland
Council of the Inn of Court of NI
The Law Society of Northern Ireland
Belfast Solicitors' Association
Queens University Belfast
University of Ulster
Northern Ireland Court Service
HM Council of County Court Judges
Law Centre (NI)
Civil Law Reform Division
Northern Ireland Law Commission
Human Rights Commission
NI Ombudsman
Equality Commission for NI
The General Consumer Council for NI
CBI NI
NI Chamber of Commerce and Industry
Federation of Small Businesses
Citizens Advice Bureaux
Forest Service
Rivers Agency
Loughs Agency
Committee for the Administration of Justice
Fire Authority for Northern Ireland
Geological Survey of Northern Ireland
Statutory Advisory Councils
Invest NI
Ministry of Defence
Northern Ireland Federation of Housing Associations
Northern Ireland Housing Executive
Northern Ireland Housing Council
Northern Ireland Tourist Board
Planning Appeals Commission
Sports NI
AFBI
Education and Library Boards
CCMS
NI Council for Integrated Education
Belfast Institute of Further & Higher Education
Chartered Institute of Housing
Institution of Civil Engineers
Landscape Institute NI
NI Association Engineering Employer's Federation
Royal Institution of Chartered Surveyors
Royal Society of Ulster Architects
Royal Town Planning Institute
Construction Employers Federation
Translink
George Best Belfast City Airport
City of Derry Airport
Belfast International Airport
Enniskillen Aerodrome
Harbour Commissioners
Quarry Products Association
Northern Ireland Water

NI Chamber of Trade
 Food Standards Agency NI
 ICTU
 NICVA
 NILGA
 Local Authority Chief Executives
 DGLS M o D
 HM Revenue & Customs
 Judicial Appointments Commission NI
 Catholic Bishops of Northern Ireland
 Community Relations Council
 Participation & The Practice of Rights Project
 NIACRO
 Director of Ports and Public Transport
 Director Regional Planning & Transportation Division
 CAFRE
 Woodland Trust
 World Wildlife Fund (NI)
 Conservation Volunteers Northern Ireland
 Tidy NI
 Groundwork Northern Ireland
 Northern Ireland Marine Task Force
 Northern Ireland Biodiversity Group
 Northern Ireland Coastal and Marine Forum
 Northern Ireland Agricultural Producers' Association
 Ulster Farmers Union
 Landscape Institute Northern Ireland
 Northern Ireland Retail Trade Association
 Local Biodiversity Officers
 Northern Ireland Fish Producers Organisation Ltd
 Anglo North Irish Fish Producers Organisation
 Waterways Ireland
 National Parks and Wildlife Service
 DARD Countryside
 Forest Service
 Loughs Agency
 District Councils
 Government Departments

CAAN
 Friends of the Earth
 Institute Of Directors
 Lagan Valley Regional
 Mourne Heritage Trust
 National Trust
 Northern Ireland Environment Link
 NIPSA
 Royal Society for Protection of Birds
 Rural Community Network
 Strangford Lough and Lecale Partnership
 Ulster Angling Federation Ltd
 Ulster Architectural Heritage Society
 Ulster Society for the Protection of the Countryside
 Ulster Wildlife Trust
 Wildfowl and Wetland Trust
 FPA NI
 Gingerbread NI
 Green Party
 Indian Community Centre
 Institute of Directors
 Law Centre (NI)
 Local Government Staff Commission for NI
 Lower North Belfast Community Council
 Magherafelt Women's Group
 MENCAP
 Parent's Advice Centre
 Methodist Church in Ireland
 Multi-Cultural Resource Centre
 Newry & Mourne Women
 NI Anti-Poverty Network
 NI Committee of the Irish Congress of Trade Unions
 NI Human Rights Commission
 NI Islamic Centre
 Northern Ireland Rural Women's Network
 NI Women's Aid Federation
 NIACRO
 North West Forum of People with Disabilities (Derry)

Local Political Parties
 Age Concern Help the Aged
 Alliance Party of Northern Ireland
 An Munia Tober
 Bahai Council for NI
 Barnardos NI
 Belfast Butterfly Club
 Belfast Hebrew Congregation
 Bishop of Down and Connor
 British Deaf Association (NI)
 Bryson Charitable Group
 Carafriend
 Carers Northern Ireland
 Children's Law Centre
 Chinese Welfare Association
 Chrysalis Womens Centre
 Volunteer Centre
 Coiste-na n-iarchimi
 Commissioner for Children & Young People
 Committee on the Administration of Justice
 Community Development and Health Network (NI)
 Community Relations Council
 Community Places
 Cruse Bereavement Care (NI)
 Foyle Women's Information Network
 Derry Well Woman
 Disability Action
 Down's Syndrome Association
 Employers Forum on Disability
 Sustrans
 Knockbracken Healthcare Park
 Falls Community Council
 Falls Women Centre
 Niamh
 Northern Ireland Council for Ethnic Minorities
 NSPCC
 Older People's Advocate
 POBAL
 Polish Association Northern Ireland
 Presbyterian Church In Ireland
 Royal National Institute for the Blind (NI)
 Royal National Institute for the Deaf (NI)
 Rural Community Network
 Rural Development Council
 Rural Support
 Save the Children
 SENSE NI
 The Senior Citizens Consortium
 The Cedar Foundation
 The Guide Dogs for the Blind Association
 The Rainbow Project
 The Women's Centre
 Training for Women Network Ltd
 ULTACH
 UNISON Northern Ireland
 Volunteer Development Agency
 West Belfast Economic Forum
 Women's Resource and Development Agency
 Women's Support Network
 Women's Forum Northern Ireland
 Youthnet
 NI Fire & Rescue Service
 ANPA
 Campaign for National Parks

