

Landscape Review: Call for Evidence

South Downs National Park Authority response



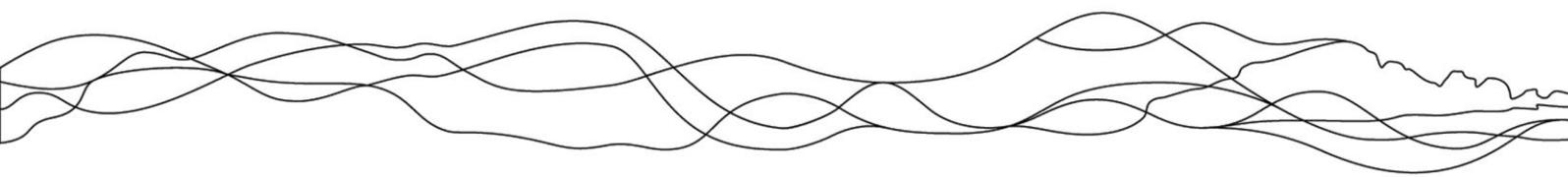
Opening thoughts

This response is based on the feedback from an Authority-wide dialogue on the questions posed by the Review team carried out over eight weeks and involving all 27 South Downs National Park Authority (SDNPA) Members, 140 staff and 450 volunteers. We have found this to be an extremely positive and productive exercise, the conclusions of which are set out below. These do not constitute the settled policy of the SDNPA, rather our preliminary thoughts in response to the call for evidence.

Our answers have been kept as brief as possible but we would be happy to provide more detail and supporting evidence on anything within the note.

SDNPA has also fed into the National Parks England (NPE) response, which we fully support. This response should be read as sitting below that from NPE, not repeating its points but supplementing its vision with additional practical detail from a South Downs perspective.

SDNPA proposals for action are highlighted in text boxes.



Part One

Review question 7: What do you think works overall about the present system of National Parks and AONBs in England? Add any points that apply specifically to only National Parks or AONBs.

National Parks and Areas of Outstanding Natural Beauty (AONBs) protect, conserve, enhance and champion the nation's most special landscapes. Partnership, access, community engagement and applied expertise are fundamental to everything they do. The term "National Park" is exceptionally strong.

As planning authorities National Park Authorities (NPAs) are able to take a sub-regional and landscape-focused approach to shaping the future of the nation's most precious rural landscapes, following natural networks, not administrative boundaries. They are the only organisations charged with, and able to deliver, planning with specific expertise at both Member and officer level, and with the resources to deliver growth in such sensitive places. Planning has special status under the National Planning Policy Framework allowing us to do so.

Uniquely they also unite strategic planning with delivery at parish- and farm-level. Their rangers and volunteers possess a deep understanding of the landscape they work on every day. This makes National Parks the ideal test beds for the delivery of new approaches to landscape management and habitat conservation. In terms of nature conservation and farm support, the place-based expertise and landscape-led plans of the SDNPA could be used much more effectively by the statutory agencies as the lens through which to deliver locally (see Q9 and 10).

By virtue of their location in the most densely populated and economically active part of England, National Parks and AONBs in the south east face a very distinctive set of pressures, but also have the potential to bring huge public benefits. The proximity to Greater London, the scale of housing demand, the need to upgrade rail, road and airport infrastructure and grow the economy all create pressures on Protected Landscapes here. Yet, because of their number and proximity to people, the South Downs has two million citizens within five km of its boundary, they provide many of the essentials of life such as clean water, fresh air and the opportunity to improve health and wellbeing.

The challenge for National Parks and AONBs in the south east is to realise the natural capital and health benefits whilst managing the pressures, so that this network of Protected Landscapes becomes a driver of the future rural economy and quality of life, rather than being viewed only in terms of a constraint to development.

These arguments are further developed in the submission from the South East Protected Landscapes (SEPL) group, of which the SDNPA is an active member.

The vision for National Parks is as relevant as it was 70 years ago and the need for them is greater than ever.

Review question 8: What do you think does not work overall about the system and might be changed? Add any points that apply specifically to National Parks or AONBs.

The National Park model does not require fundamental change but it does need refreshing to allow NPAs to address challenges from climate change, development, species decline, Brexit and many other factors that could not have been envisaged 70 years ago.

English National Parks have not been able to exploit their full potential or to become as central to national identity as those in some other nations, such as the US. This is partly due to the formal processes that necessarily attach to the accountable delivery of the essential planning role.

This response seeks to address these issues with practical suggestions for action relevant to the populated lowland landscapes of the South Downs.

There are, however, a series of other obstacles that should be addressed, namely:

- Shortage of resources and, until the last four years, the absence of long term funding security necessary to address long-term challenges;
- Lack of weight attached to landscape-led and partnership-based Management Plans, in particular respect to other public bodies who operate within their boundaries, and the relative weakness of the Section 62 (S.62) Duty on these bodies (including Local Authorities, Local Enterprise Partnerships, Statutory Agencies and infrastructure providers), to have Regard to National Park Purposes
- Insufficient powers to exploit the full commercial potential of the brand and identity;
- Lack of a strong voice with policy makers within Whitehall, particularly in realising the full potential of National Parks to contribute many public benefits in areas like health and education;
- A fragmented public sector approach to the protection of the natural environment which leaves many of the key powers and responsibilities in the hands of other bodies that have very different objectives. In many cases this is leading to a deterioration of assets within the National Parks as public bodies manage cuts in funding.

Part two

Review question 9: What views do you have about the role National Parks and AONBs play in nature conservation and biodiversity? Could they do more to enhance our wildlife and support the recovery of our natural habitats?

(This answer also addresses review question 23)

The National Park designation confers no bespoke mechanisms to protect and enhance biodiversity when compared with areas outside the boundary, nor does the SDNPA own any land. We therefore rely on existing general policy and legislation, on the ability to engage and influence private landowners, and on our operation of the planning system.

In order to deliver the biodiversity elements of National Park Purpose 1, we rely on strong EU and UK legislation to protect important sites and endangered species, along with wider measures to protect wildlife. This framework includes the network of designated sites such as Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Sites of Special Scientific Interest (SSSIs). Other tools include the network of non-statutory Local Wildlife Sites and Local Nature Reserves.

But these only provide baseline protection for core sites and species. The Defra *25 Year Environment Plan* and the Lawton Report '*Making Space for Nature*', envisage not just a minimal level of protection but rather an enhancement and restoration of nature and natural processes throughout the wider landscape – more, better and joined up. We want to be the forefront of this recovery.

The potential for a new Environment Act, the establishment of an England Land Management Scheme (ELMS) and the implementation of the *25 Year Environment Plan* all provide the opportunity to strengthen the mechanisms available to the SDNPA (and all NPAs) to conserve and enhance biodiversity. For example:

- The Partnership Management Plan and S.62 Duty should be given more weight in relation to the Statutory Agencies Natural England, the Environment Agency and the Forestry Commission, so that their Area Plans are fully aligned with the objectives of the National Park (see also Q8 above and elsewhere); the SDNPA should be given specific powers to bring together partners to establish a Natural Capital Plan and a Nature Recovery Network within the boundary and (via the Duty to Co-operate) a network of green infrastructure around it;
- Within a National Park, the condition of all designated sites and especially National Nature Reserves (NNRs) needs to be exemplary and this is not always the case in the South Downs. NNRs and other land belonging to public bodies (such as Forest Enterprise) should be required to be managed in accordance with National Park Purposes and to act as interpretive gateways to the wider designated landscape. Options could include setting higher standards, increasing resourcing from existing bodies or even (in specific cases such as NNRs) transfer of responsibility and funding to the SDNPA itself;
- The SDNPA should be given a role with respect to the design, delivery and monitoring of the new ELMS (see also Q11) within the National Park and in line with the Partnership Management Plan;
- As part of a general power of competence as requested by National Parks England (NPE), the SDNPA should have the ability to establish a local market in biodiversity offsetting and the provision of ecosystem services, so that compensation payments from developments outside the National Park can be channelled to landowners within it;
- All biodiversity data collected by public bodies should be required to be able to be configured to the boundary of the National Park so that the state of nature within it can be effectively audited;
- Through its planning service, the National Park should be given the mandate to undertake a national pilot of the implementation of Net Environmental Gain.

Review question 10: What views do you have about the role National Parks and AONBs play in shaping landscape and beauty, or protecting cultural heritage?

The gentle, hospitable, mixed farming and wooded landscapes of the South Downs, and the inspiration that they invoke, are key to the designation of Britain's newest National Park. Always attractive to settlement, they have been shaped by incremental human interventions for more than 5,000 years, giving a rich complexity and time-depth. Artists, writers and composers have all responded to this landscape, an impulse which continues to this day with contemporary artists and craftspeople. The historic built environment is an integral component of this agrarian, lowland landscape, with vernacular building traditions largely predicated on the availability of local materials.

Protected Landscapes in the congested south east are under acute pressure as farming, transport, development and recreational use is at its most intense. Alongside major housing developments, major infrastructure schemes include trunk roads, fuel pipelines, cable routes and water infrastructure. Managing these pressures – so the landscape can evolve and neither fossilise nor lose its special qualities – is the SDNPA's overarching challenge. This requires an approach which goes well beyond the boundaries of the National Park since its long thin shape means that changes around it will have a profound effect on its context and character.

There are a number of measures which could strengthen the ability to do this:

- The S.62 Duty (on other public bodies to have Regard to National Park Purposes) is weak, no longer fit for purpose, and requires overhauling (see also Q8);
- The Partnership Management Plan (see also Q9) needs to be given more weight with regard to statutory undertakers and infrastructure providers such as Highways England (HE), Local Highways Authorities (LHAs), Network Rail, energy, power and water companies;
- A mandatory process for approval of statutory undertakers and other bodies permitted rights needs to be established and embedded in legislation to ensure that the NPAs are fully informed and given decision making powers;
- Network operators should be required to undertake (or delegate) high quality conservation management of linear landscapes alongside roads, railways and powerlines to provide intrinsic connectivity within the landscape and hence contribute to the Nature Recovery Network (see Q9);
- New ELMS schemes (see also Q11) should include payments for landowners to manage and interpret cultural heritage assets, such as scheduled ancient monuments.

Review question 11: What views do you have about the role National Parks and AONBs play in working with farmers and land managers and how might this change as the current system of farm payments is reformed?

As with all Protected Landscapes, farming and forestry have shaped the landscape of the South Downs National Park. In particular, the intimate mosaic of lowland mixed farmland and very large amounts of woodland that both residents and visitors enjoy is hugely dependent upon the approximately 950 registered farm businesses present here.

Farming and forestry are an integral part of rural development, supporting jobs and growth in the broader rural and visitor economy. The SDNPA recognises this and has developed an effective partnership with the farming, forestry and landowning community in the South Downs. From an understanding of the landscapes, and the pressures and opportunities that managing them at present, there is a mutual drive towards more sustainable forms of agri-businesses.

The SDNPA has no specific powers or funding streams for this work. However, through the Partnership Management Plan, by developing close working relationships with Natural England and the Forestry Commission, and through its ranger teams, we work in many ways with farmers and land owners. These include assistance with habitat management, advice and support particularly through six farm clusters, and support for the creation of Whole Estate Plans for the larger and more complex rural holdings. In parallel, the South Downs Forestry Champions Group brings together landowners, Forestry Commission, the Woodland Trust, architects, and others to promote sustainable woodland management.

To secure long-term outcomes appropriate to this landscape, the SDNPA would like to be more involved with the new ELMS whereby:

- SDNPA staff use their detailed local knowledge to tailor the national scheme to work for both the applicant and the special qualities of the National Park;
- This knowledge is also used to inform the development of outcome based management, with local circumstances and constraints taken into consideration;
- Service Level Agreements are established with Natural England, the Environment Agency and the Forestry Commission so that the national expertise of each can be channelled through the local advice network of the SDNPA;
- Resources are made available to extend the current network of farmer led clusters right across the National Park, giving all individuals and businesses the opportunity to benefit from peer support and deliver public benefits at a landscape scale.

Realising this ambition would mean an increase in staff resource to be able to deliver to the scale and quality that is necessary to secure effective results. These ideas are set out in more detail in the *Farming the Future* pilot proposal to Defra submitted March 2018.

Review question 12: What views do you have about the role National Parks and AONBs play in supporting and managing access and recreation?

As a lowland landscape of mixed farming and woodland, the SDNP does not have large tracts of open access land. To a greater extent than many other Protected Landscapes, accessibility in the SDNP is heavily reliant on the Rights of Way (RoW) Network. There are 3,600km of RoWs running through the South Downs and queen amongst these is the 160km South Downs Way, the only National Trail to sit wholly within a National Park. But there are many footpaths, bridleways and Byways Open to All Traffic (BOATs), some of which are heavily used with some inevitable tensions between user groups.

Visitor pressure varies across the National Park with some real hotspots (Beachy Head has a million visitors a year) but many tranquil areas. Excessive noise, pollution and disturbance from motorcycles and anti-social driving by 4x4 vehicles are long-standing problems in certain parts of the National Park and deter other users. Access to the RoW network is heavily car dependent as rural bus services have been reduced, but efforts are being made to promote routes which start or finish at bus stops or railway stations.

Unlike some other NPAs, the SDNPA does not manage the RoW network, visitor car parks or recreation sites. The only exception is the South Downs Way National Trail, which we manage in partnership with the LHAs under a unique Trail Partnership. Responsibility for the wider RoW network resides with four Highways Authorities, and although there is good partnership working between the SDNPA and these bodies there is no requirement for the management of the network within the National Park to be to a higher or different standard than outside it. In the current financial climate LHA resources are extremely tight. This is a problem looking forward, since the SDNPA aspiration is for the National Park to be more

accessible to a wider range of people from different backgrounds, thereby improving their health and wellbeing – especially the two million who live just outside the boundary. This means not just maintaining but radically improving the RoW network with better surfacing, signage and the removal of barriers to access, such as stiles.

Despite these constraints and the complexity of working with multiple authorities, considerable progress has been made in establishing off-road, family-friendly trails for cyclists, walkers and riders, along with others for whom mobility is more limited. There is an issue about long-term maintenance as in the current financial climate there is an understandable reluctance by LHAs to designate these new trails as part of the RoW network.

To realise the aspiration within the Partnership Management Plan to make the South Downs more accessible a number of measures could be considered:

- A requirement for a higher minimum standard for the condition of RoWs within the National Park regardless of which public body is responsible for maintenance;
- Given the central importance of the RoW network in providing access and improving health & wellbeing for those in and around the National Park it is essential that their condition is improved and that the resources are identified for this, whether the responsibility for the network remains with the LHAs or is transferred to the SDNPA.
- Targeting of the new ELMS (see also Q11) to the landscape corridors within which RoW sit to improve the user experience – for example through removal of ‘fenced in’ routes or the creation of species rich path verges;
- Statutory consultation with the SDNPA if the level of bus services is proposed to be changed, including weekend services, and priority attached for funding for transport services providing access to the National Park for disadvantaged groups by the Department for Transport (DfT) and the Department for Health (DH), to be matched by Big Lottery support (see also Q14).

Review question 13 & 13a: What views do you have about the way National Park and AONB authorities affect people who live and work in their areas? Are they properly supporting them and what could be done differently?

One of the SDNP’s greatest resources is the more than 112,000 people who live and work here, including in sizable market towns such as Petersfield and Lewes. The National Park designation can offer an increased sense of well-being, sense of identity and provide greater scope for diversification of rural activities through business such as tourism, leisure and entertainment – in essence the place attracts people. However, there is a risk that this popularity also contributes to lack of affordability, more commuting residents and loss of local work opportunities, an increase in traffic but loss of public transport, loss of rural services and facilities, ageing population and less employment opportunity. Affordable housing and transport are critical (see Q14).

As with areas outside the National Park, poor rural connectivity means people work elsewhere, invest elsewhere and can become transient members of their community. Yet with the right support and infrastructure – crucially ultrafast broadband and suitable employment space – the South Downs can protect and expand high-skills employment, retain young people and encourage investment.

Despite these challenges, the SDNPA currently supports the communities of the South Downs in a number of ways. We work closely with all 176 Town and Parish Councils, and support 53 Neighbourhood Planning groups who have so far allocated land to deliver over 1000 homes, identified and protected important Local

Green Spaces and prepared policies to protect important local services and facilities. More than 100 of our local communities have prepared other forms of community-led plans, such as Village Design Statements. These plans influence change locally and help residents to conserve and enhance their towns and villages, whilst providing much needed local housing and safeguarding local services and facilities.

A pioneering approach to Whole Estate Plans, linking planning to wider husbandry of the landscapes these estates manage, complements the work of farm clusters and ranger teams who offer hands-on support and advice to land managers, community and conservation groups, parish councils and individuals. Our Sustainable Communities Fund has, to date, allocated funding to 192 projects totalling £1.3m; through the Community Infrastructure Levy (CIL) we have allocated £100,000 allocated in year one; and the new South Downs National Park Trust, was established last year. These all provide support for local projects and communities in the Park.

Through a strengthened role in rural development the SDNPA aspires to do more for its rural communities and their economy, and this would be assisted by a number of practical measures such as:

- Establishing a Rural Growth Deal for National Parks. By virtue of having a Partnership Management Plan for the entire landscape area and the businesses and communities within it, the SDNPA is well placed to ensure that future support from Government to the rural economy is effectively channelled;
- The new ELMS will be a necessary but not sufficient mechanism to support rural businesses through the transition after Brexit. The Shared Prosperity Fund needs to be targeted at rural as well as urban areas and the SDNPA is an appropriate conduit for this within the National Park;
- A Big Lottery Fund pot should be reserved for deprived urban areas adjacent to National Parks on the 'Big Local' model.

Review question 14: What views do you have on the role National Park and AONB authorities play on housing and transport in their areas?

Housing

SDNPA is increasing affordable housing through neighbourhood planning, stringent Local Plan affordable housing targets and initiatives targeted at providing affordable housing in perpetuity.

These measures are bearing fruit but, with house prices known to be exceptionally high in National Parks and the SDNP in particular, with the following new initiatives, we can do more:

- Currently the New Homes Bonus for housing within a National Park goes straight to the local authority, giving the NPA no recompense for the cost of delivering high quality sustainable new development. We therefore propose that 50% of the bonus within a National Park should be received by the NPA awarding planning consent, leaving the remainder with the local authority to cover the costs of servicing the new development;
- There should be dedicated Homes England funding for NPA affordable housing developments;
- As part of a Rural Growth Deal (see Q13) NPAs should receive support for the delivery of further affordable housing;
- National Parks should be exempt from the Right to Buy initiative in order to help maintain the existing stock of affordable dwellings;
- The Rural Housing Network has recently submitted a pilot proposal to Government for a Revolving Rural Land Bank to acquire difficult sites and to bring them forward for development quickly. This should be extended to cover all NPAs in England.

These proposals support SDNPA's existing work in affordable housing whilst expanding our capacity and our ability to deliver.

Transport

NPAs have no powers in relation to transport and what has been achieved is as a result of partnership working (see also Q12) but as the popularity of visiting National Parks continues to grow so too does the impact of traffic and transport.

We therefore suggest that:

- LHAs should be required to work with the SDNPA to produce highways schemes which are sensitive to and enhance the special qualities of the National Park, working with local communities;
- There should be a dedicated lottery fund for providing sustainable transport options in National Parks, with an emphasis on increasing access from disadvantaged neighbouring urban areas (see also Q12);
- LHAs should have stronger regard to the aims and objectives of Partnership Management Plans to ensure that rural transport services make a real difference to transport choices and provision (especially as a lack of affordable transport is a barrier to access for many under-represented groups);
- NPAs be enabled to produce movement strategies which Local Authorities would have to take into account when approving housing developments outside the National Park boundary, so that the impact of traffic associated with new developments is considered as part of the decision making process.
- The Chair of SDNPA currently sits on Transport for the South East as a representative of all Protected Landscapes in the region. This model should be extended by giving all NPAs a place on regional transport boards as full members with full voting rights.

Part 3 – Current ways of working

Specific questions about the way National Parks and AONBs work at the moment.

Review question 15: What views do you have on the way they are governed individually at the moment? Is it effective or does it need to change, if so, how?

The balance of Membership, between parish, local authority and secretary of state appointees and independent co-optees, enables a wide range of voices to be heard in the NPA's decision making processes. This enables non party-political decision making and avoids block voting. Whilst the committee model which NPAs follow can be seen to be dated, particularly in relation to the executive models of governance available to Local Authorities, it does enshrine the fundamental principle that all Members can be fully involved.

- The effectiveness and impact of NPA decision making could be improved through a strengthened obligation on partners to consider and respond to shared National Park issues. This would help facilitate closer working and shared ownership of key issues between the NPA and their partners. As mentioned elsewhere, this should be supported by a strengthened and updated S.62 obligation on statutory partners to further National Park Purposes and to co-operate in the development and implementation of National Park Management Plans as the primary place shaping document for their area.
- NPAs would benefit from clarity in relation their ability to function beyond their boundaries, particularly in relation to the ability to 'sell' the expert services that exist within NPAs that may benefit other Protected Landscapes or community groups. Allowing NPAs to develop as centres of excellence in relation to, for example, community planning, green infrastructure, natural capital etc. would enable the benefits of National Park experience to be utilised across the wider country
- Currently provision of services beyond National Park borders is complex and requires a direct and explicit link to our Purposes and Duty, which inhibits the development of such centres of excellence. This could be achieved through the functionally specific power of competence being expanded to mirror the Local Authorities general power of competence.
- Other proposals in this response seek to encourage greater understanding of and involvement in National Parks by young people. These proposals could be supported by the creation of Youth Ambassadors in every National Park forming a Youth Council which elects one Member to full NPA Membership. This could be achieved on a co-optee basis under the current powers but a change in the law to give such members full voting rights would be preferable.

Review question 16: What views do you have on whether they work collectively at the moment, for instance to share goals, encourage interest and involvement by the public and other organisations?

Although there are currently few statutory requirements or powers for NPAs to work beyond their borders much is already done on a discretionary basis. There is scope for closer collaboration and shared services between National Parks, but this cannot be on a 'one size fits all' approach. Individual NPAs vary greatly in their operating model and in the challenges they face. This variety is a great strength since it allows them to directly address the specific needs of their communities and their landscapes. It does, however, mean that collaborative models must be carefully tailored. One example is the close collaboration between the lowland National Parks of the South Downs and New Forest. This includes a one-year trial of shared services in HR and jointly commissioned work on green infrastructure.

Another example is the UK-wide sharing between NPAs that SDNPA has championed through the National Parks UK (NPUK) 'Working Together' initiative which has already generated considerable savings, as well as providing a seamless route for the exchange of best practice between National Parks in the form of the

Electronic Learning Management Service e-learning portal, which has now been adopted by 11 authorities. Such linkages between NPAs increase efficiency, share best practice and strengthen the collective profile but there is much further to go.

SDNPA is in the process of extending joint working to our local 'family' of AONBs (see Q20). We have a strong shared agenda with our neighbouring AONBs and they are keen to work with us to develop sub-regional landscape-led partnerships. This might include the provision of active support to neighbouring AONBs, that struggle to find sufficient resources, with the aim of developing a bigger, better and more joined up natural capital and green infrastructure strategy spanning the south east.

This new collaborative model presents an exciting vision for the future of National Parks as the best places for nature, connected to each other and to the surrounding AONBs through wildlife and landscape corridors, to enhance the environment, improve biodiversity and increase resilience to climate change. This would encourage greater interest and engagement from the urban communities that are scattered amongst this network since they would be part of a network with 'their' National Parks and AONBs.

A more local existing example is the UNESCO designated Living Coast biosphere initiative which works with the SDNPA and is centred on the City of Brighton and Hove and includes much of the eastern section of National Park, the surrounding towns with a total population of about 350,000, as well as the marine area.

Review question 17: What views do you have on their efforts to involve people from all parts of society, to encourage volunteering and improve health and well-being?

The South Downs National Park is an inspirational landscape and is uniquely placed to take people on a journey from awareness to accessing and enjoyment, and on to taking an active role in caring for it through volunteering and other activities. Taking people on that journey has multiple benefits that are proven to have a significant impact on individuals' health and well-being.

However, the current profile of visitors to the SDNP is skewed and despite specific, targeted interventions, there are certain groups of society that remain under-represented. In addition, and despite best intentions, the NPA, its staff and volunteers, are not yet representative of the wider demographic of the areas and communities around it.

To date, the SDNPA has been very successful in interventions to promote equality of access to these under-represented groups with targeted inclusion projects including empowering community champions, creating youth volunteering ambassadors and providing a school travel grant specifically aimed at schools in areas of deprivation. While there may be a significant impact for those individuals there is no sustainable overall impact and more can be done to mainstream opportunities for engagement from people across all parts of society.

A 2017 SDNPA school survey found that 96% of school leaders in our region felt that learning outside the classroom was good for children's physical and mental health and improved their personal, social and emotional development. Our work to engage schools with learning in the SDNP is having a significant impact with 69% of schools in and around the National Park using it for learning outside the classroom.

The Volunteering Development Strategy for the SDNP includes activities to diversify the volunteering roles that are available within the SDNP and the ways in which people can choose to engage with these. In addition to practical conservation work, these can include many other aspects of National Park business including welcoming visitors, neighbourhood planning, digital marketing and so forth. In order to increase the range of people able to volunteer we need to look at alternative models of engagement, for example micro-volunteering or youth volunteering experience packages.

The biggest challenge is to scale up the work we are already engaged in and make it more generally applicable across a wider section of society. There are a number of structural issues at national level which need to be addressed in order to help us realise that potential:

- National Health Service (NHS) and Public Health England (PHE) funding and structures need to be explicitly directed to the support for living healthily that National Parks can contribute to such as; developing the use of natural capital tools to assess the cost benefit of the National Park through provision of access to nature and green space and; developing awareness of National Parks and other protected landscapes as a resource for social prescribing;
- Social prescribing made available across all National Parks and AONBs funded from the additional money for the NHS, including a funded facilitator in each protected area who would have direct contact with GP surgeries to create a national network of social prescribing facilitators;
- New sources of funding need to be identified to develop and build on previous, and highly successful, initiatives like Mosaic, which worked with community champions and underrepresented groups in and around the boundary of the National Park. These champions can reach groups which might otherwise be excluded, for example by income, disability, age or ethnic background. A new NPE/NHS collaborative scheme could support the NPE Natural Health Service proposals by providing opportunities for those with disabilities. Another example would be a John Muir programme, delivered via champions working with families in deprived communities;
- Incorporating Protected Landscapes like the SDNP into the national curriculum across all subject areas and key stages, providing teaching resources and creating an entitlement to visit at junior and senior level;
- Investment in sustainable transport particularly serving rural areas as this is a key barrier to access for under-represented groups, including young people. (see also Q12 and 14);
- Governance reforms are needed to support diversification of representation on NPAs, in their staff and volunteers (see Q15);
- S.62 Duty to have Regard to National Park Purposes needs to be strengthened and updated to facilitate working beyond the boundary with a range of public bodies (see also Q10).

Review question 18: What views do you have on the way they are funded and how this might change?

In addition to funding through Defra by means of a National Park Grant, NPAs are also levying organisations in that they have the ability (not currently used) to place a precept on the local taxpayers.

SDNPA recommend that both elements are critical to the 'national' status of NPAs and should be retained in the future.

The ability to set a precept on local taxation is important as it underpins the responsibility the NPA has to the local community and even when not used, is worth c£750,000 per annum to SDNPA in savings on VAT.

Continuity and security of funding is essential to the development of the long term vision for people, place and landscape. It is also necessary to underpin ambitious plans for income generation at national and NPA level.

NPAs have benefited from a stable, index-linked four year funding settlement from Defra which expires in 2019/20. SDNPA seeks a continuation of this arrangement to allow us to continue our existing plans. We also support the NPE proposal for the transfer of funding from existing sources (such as the Shared Prosperity Fund and our response to Q13) to ensure NPAs can carry out enhanced responsibilities arising from the Review and achieve the wider ambitions in the *25 Year Environment Plan*.

There is considerable potential for individual NPAs to attract additional funding from charitable sources. This harnesses people's love for local landscape and gives them a tangible way to express it. SDNPA set up an independent charitable trust in October 2017 which has attracted £400k in its first year, with a clear upward trend established.

Many NPA charities are new and one of their key challenges to increasing funds is raising awareness. DEFRA could, as the Department for International Development (DFID) has done so effectively, operate a matched giving programme for donations to National Parks. This could be centred on National Parks weeks or significant anniversaries, such as next year's 70th celebration and would provide a hook to engage local media and help the new charities to develop a long-term support base.

A Community Foundation is being established in the South Downs to raise funds from individuals and businesses for investment with the profits distributed to local good causes through an annual grants programme. This creates sustainable funding that grows over time and is resilient to external funding uncertainties.

Foundations could be set up by other National Parks and incentivised with government matching. A model already exists in the way the government has matched donations to Community Foundation Endowments through their Community First programme which has raised £130 million nationwide. If this scheme were repeated then National Park Community Foundations could be included.

Review question 19: What views do you have on the process of designation – which means the way boundaries are defined and changed?

Boundary changes, which currently require the making of a Variation Order, can be costly, complex and subject to challenge through Public Inquiry. This means that Natural England, as the designation authority, is often reluctant to consider such changes. Yet many NPAs and AONBs could make a strong case for modest community-led extensions to their boundaries that meet the statutory criteria. Such extensions could, for instance, reunite divided parishes or incorporate a newly created nature reserve.

There could be a fast-track process for making Variation Orders to extend existing designations, though this would need to reconsider the threshold at which a Public Inquiry might be appropriate or triggered. Currently this threshold is very low since it only takes an objection from one parish or local authority. The fast track could apply in cases where full support for the boundary variation could be demonstrated (including from the parish and local authority) and where the extension was modest in size, perhaps restricted to the area of a single parish. This would allow anomalies to be corrected and communities empowered without the need for costly and laborious process.

Review question 20: What views do you have on whether areas should be given new designations? For instance, the creation of new National Parks or AONBs, or new types of designations for marine areas, urban landscapes or those near built-up areas

As set out in the opening part of this response, a particular set of challenges and opportunities present themselves for the family of Protected Landscapes in the south east. As the newest National Park, SDNPA is always ready to meet and share experience with potential candidates for new designations – we have met many over the past year and are an active member of the SEPL group which includes all the AONBs in the south east plus the two National Parks.

- Given the high percentage of the south east already covered by landscape designations it would seem unnecessary to divert attention, time and resources to establishing new ones. However, there may be a strong case for some AONBs or Conservation Boards to be designated as National Parks, applying the ‘especially desirable’ test from the 1949 Act - although the process of making and consulting on the designation orders and the necessity of revoking the existing AONB designation makes it time consuming and prone to challenge.
- The AONB model has many virtues in its own right, especially the fact its partnership model has a direct link into local authorities. For some landscapes this model may remain the best option, especially for smaller areas with less complex management issues, which may be lost in the desire for full parity with National Parks.
- Many current AONB concerns could be addressed by making them a statutory consultee or bolstering their role around planning, without the need or expense of establishing them as Planning Authorities in their own right. Most notably, stronger protection could be afforded through the production of joint, landscape-led, Local Plans for AONBs on the South Downs model.
- The current legislation allows for, and requires, National Park designations to be ‘close to centres of population’ so SDNPA believes there is no need to create a new designation for such locations unless the purposes of designation were very different from National Parks or AONBs i.e. they are intended as less of a landscape designation, and more of an access, recreation and ‘cultural services’ based designation. This might present a sensible lower threshold for new designations that would not be required to fully meet the National Park or AONB criteria or might fail to meet all the statutory tests.

Review question 21: Are there lessons that might be learnt from the way designated landscapes work in other parts of the United Kingdom, or abroad?

Although the basis for National Park designations in the US (publicly owned wilderness areas) is very different from the British model of privately owned living and working cultural landscapes, other aspects of the US model are highly relevant. For example, the US National Parks Service (NPS) provides excellent lessons in the ability to present a coherent and consistent brand across all their National Parks without dilution of individual park identity. The development in the US, over many years, of park-specific foundations, such as those for Yosemite, and Yellowstone, means they have been able to substantially enhance their resources (see also Q18).

UK/English National Parks should continue the development of their collective brand, building on their successes to date, such as the Columbia partnership, alongside the development of National Park-specific Trusts.

In an attempt to manage human impact on the natural ecosystems of their designated areas many National Parks across the world have adopted a zoning system with varying levels of permitted access or visitor infrastructure. The models from developed countries with similar cultural landscape may be relevant here. For example, the Berchtesgaden National Park in Germany has introduced a 'core' area, dedicated to restoring natural processes and a more wild experience, and 'care' zones which feature visitor centres, restaurants and a degree of cultural grazing (the primary use of the land prior to designation).

The introduction of a Nature Recovery Network or increased protection of our NNRs could provide a mechanism for zoning and management prioritisation within the SDNP. In addition, a zoning approach around the National Park, working with neighbouring authorities and landowners, would allow this network to extend seamlessly into the wider landscape (see also Q9).

Part 4 – Closing thoughts

Review question 22: Do you think the terms currently used are the right ones? Would you suggest an alternative title for AONBs, for instance and if so what?

The term ‘National Park’ is an extremely valuable and internationally recognised designation and should not be changed or diluted. AONB is a more complex and less understood term but SDNPA cannot suggest a better alternative.

Review question 23: The review has been asked to consider how designated landscapes work with other designations such as National Trails, Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), National Nature Reserves (NNRs) and Special Protected Areas (SPAs). Do you have any thoughts on how these relationships work and whether they could be improved?

This issue is addressed in our answer to Q9 (in terms of designated sites) and also Q12 (re National Trails).

Review question 24: Do you have any other points you would like to make that are not covered above?

The newness of the SDNP means that it will take time to raise the profile and identity of this landscape (in contrast the Lake District has been doing this for nearly 70 years). This is harder when every Non-Governmental Organisation (NGO) and public body within their area displays its own brand without acknowledging the existence of the wider National Park. To this end the SDNPA developed, in partnership with others and using professional brand consultants, a visual toolkit (known as the Shared Identity) which can be used alongside and integrated with other brands. The take up has been mixed – we try to correct this by agreement but this is expensive and time consuming and often results in failure. It is not surprising that the public become confused about the national status and significance of their National Park when they are presented with a range of different signage and little unifying landscape identity.

We propose that all public bodies (and rail franchises) operating within National Parks should be required to feature the National Park on their signage alongside their own identity and that NGOs should be urged to do the same.

NPE and NPUK currently sponsor more than a dozen expert groups of specialists from all National Parks, each led by a National Park Officer. These policy-focused groups meet regularly to share best practice, undertake training, initiate policy and respond to consultations. They represent an invaluable national resource that is not sufficiently recognised or utilised.

SDNPA therefore propose that the Review should create a clear channel for NPE/NPs in general, and these groups in particular, to input their expertise into national policy making, for example, by giving the expert groups a seat at the table at Defra and Ministry of Housing, Communities and Local Government (MHCLG) committees on relevant policy issues, by cross secondment and the shared delivery of training.