

Report to **South Downs National Park Policy & Resources Committee**
Date **20 November 2025**
By **Performance and Projects Manager**
Title of Report **South Downs Partnership Plan 2026-2031 – Draft Plan**
Decision

Recommendation: The Committee is recommended to

- I. Recommend that the National Park Authority approve the Partnership Management Plan 2026-2031 at Appendix 3 for publication.**
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I. Introduction

- 1.1 The purpose of this report is to update Members on the review of the South Downs National Park Partnership Management Plan (the PMP) and to seek the Committee's recommendation to the National Park Authority that it approve the PMP 2026-2031 for publication. It sets out the legislative requirements and responsibilities of the National Park Authority and its partners, how the plan was developed, the assessments carried out, the results of consultation and subsequent changes to PMP.
- 1.2 Our approach to the review of the PMP for 2026-2031 was informed by an extensive evaluation of the 2020-2025 plan process, including lessons learned. In June 2025 [Natural England \(NE\) produced guidance for Protected Landscapes in England](#) which set out how management plan reviews should be conducted.

2. Policy Context

- 2.1 The National Parks and Access to the Countryside Act 1949 ('the 1949 Act') enabled the creation of National Parks and Areas of Outstanding Natural Beauty (now known as National Landscapes), ensuring the protection of the Country's most valued, beautiful and unique landscapes.
- 2.2 National Park Authorities are the responsible Authority for their area. The statutory purposes and duty for National Parks are set out in the National Parks and Access to the Countryside Act 1949. The purposes are to conserve and enhance the natural beauty, wildlife, and cultural heritage of their areas and to promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public. The duty is to seek to foster the economic and social well-being of local communities in the National Park, while pursuing the purposes.
- 2.3 The Management Plan is the main policy document for a National Park Authority. Covering the designated area as a whole, it outlines shared goals and strategies across various organisations to fulfil the park's statutory purposes. As an overarching guide, it aligns other related policies and ensures these purposes are met.
- 2.4 Under Section 66 of the Environment Act 1995, National Park Authorities are required to review their Management Plan before the end of the period of five years beginning with the

date on which it was published and, after the first review, at intervals of not more than five years. The review determines whether it would be expedient to amend the Plan and what (if any) amendments would be appropriate, to make any amendments that are considered appropriate, and to publish a report on the review setting out amendments made.

- 2.5 The Levelling Up and Regeneration Act 2023 (LURA) section 245 requires authorities and public bodies to 'seek to further' the statutory purposes of Protected Landscapes when making decisions or taking action under the amended National Parks and Access to the Countryside Act 1949. Contributing to the Partnership Management Plan helps authorities demonstrate this commitment, and partners - including the SDNPA - will help achieve the targets in the Protected Landscapes Targets and Outcomes Framework.
- 2.6 We have had regard to NE's management plan guidance in carrying out the review of the PMP, including inclusion of the Protected Landscapes Targets and Outcomes Framework (PLTOF). As required, we notified Natural England of our intention to review the PMP on the 11 of June 2025.

3. How the plan was developed

- 3.1 The plan was developed in 4 stages: pre-consultation preparation which included the initial drafting of the PMP with internal teams and stakeholders; formal consultation from 09 June until 01 August 2025; analysis of the feedback from August to September and finally revisions to the PMP during September and October.

Pre consultation preparation

- 3.2 The first part of the review of the PMP was conducted between late 2024 and March 2025 using an inclusive, co-designed process involving 1,900 key stakeholders providing 3714 comments. Facilitation and engagement consultants provided expert support throughout. This methodology aimed to enhance commitment and foster a collective sense of responsibility for the objectives and anticipated outcomes of the PMP among partners and stakeholders. This approach resulted in a first draft of the PMP that closely reflected the issues and concerns shared during the initial engagement. SDNPA staff also ran engagement events with their networks and stakeholders using a similar methodology to that used by the consultants, to ensure a consistent approach. SDNPA staff and Members were also consulted as a groups and Members were encouraged to attend engagement events.
- 3.3 A Steering Group of key partners was set up to provide critical friend feedback on the development to the PMP. The Terms of reference and membership of the Steering Group, which were agreed by the NPA in October 2024, are at **Appendix I**. The group met 5 times during the process, starting in December 2024 and concluding its work in November 2025. Membership spanned many of the key sectors that needed to be engaged in the PMP review.

Steering Group

- 3.4 Over the course of five PMP Steering Group meetings, members collaboratively shaped the strategic direction and delivery framework of the PMP. Discussions focused on aligning local priorities with DEFRA's national objectives, integrating feedback from public and partner consultations, and refining thematic aims around climate change, nature recovery, access, cultural heritage, and community wellbeing. The group debated terminology such as "regenerative farming," addressed challenges in water quality and housing affordability, and emphasized inclusivity through demographic analysis and engagement with under-represented groups. Evidence from the State of the Park report and LNRS surveys informed target setting, while the need for a succinct, actionable delivery plan led to suggestions for thematic delivery groups and a logic model approach. Design and communications strategies were also explored, with plans for a digital storytelling platform and a January launch event to engage stakeholders and celebrate the Steering Group's contributions. Feedback was provided on the two drafts of the plan, first prior to consultation and second the final draft.
- 3.5 An internal staff project group was set up to oversee the process internally. It included staff from across the organisation. This was particularly important as we are also in the process

of reviewing the Local Plan for the South Downs. Having a representative from the Local Plan team in the project group was invaluable.

- 3.6 SDNPA staff used the material from the engagement and from discussion with their expert networks and feedback from the steering Group to provide content. This was then crafted into a draft plan by the Head of Communications and Engagement providing one authorial voice and a consistent approach across the whole plan.

Consultation

- 3.7 Broad consultation on the plan was between 9 June and August 2025. In addition, there were a series of meetings with key stakeholders and involving existing networks. Both Staff and Members played a significant role in making the consultation a success.
- 3.8 The consultation was managed through an online platform, with options for partners to provide feedback using a word document if that was easier for them. These responses were then uploaded into a specialist
- 3.9 AI platform to provide analysis of the free text feedback. There were separate questions for partner organisations and members of the public. 458 responses were received. 112 from partners and 346 from the public. Both surveys sought input on the National Park 2060 vision and the aims, planning principles, and format of the draft Plan. The partner survey included deeper questions on specific objectives and targets, suggestions for monitoring and delivery expectations and how the Plan would be used in practice. A report of consultation is at **Appendix 2**.

Analysis and changes to the plan

- 3.10 83% of partners agreed that overall, the aims were the right ones for the next 5 years, 80% of the public also agreed. There was a high degree of unanimity between partners and the public related to each of the aims and the targets. Partners tended to agree more strongly overall, especially on technical and strategic aims like water management and youth engagement. Public responses were more cautious, often reflecting concerns about feasibility, clarity, and inclusivity. Climate and Economy showed the greatest divergence, with partners focused on policy alignment and the public on lived experiences and accessibility. Cultural Heritage had the lowest agreement, suggesting a need for stronger engagement and clearer representation of diverse narratives. The table below sets out a summary of the overall findings for each aim.

Aim	Partners Agreement	Public Agreement	Summary of Differences
Aim 1: Nature Recovery	82%	76%	Partners emphasized delivery mechanisms and monitoring; public focused on visible outcomes and concerns about farming practices.
Aim 2: Climate Action	78%	65%	Partners supported net zero ambition but questioned feasibility; public found language too technical and targets unrealistic.
Aim 3: Clean Water	85%	72%	Partners appreciated catchment-based approaches; public raised concerns about water quality and infrastructure gaps.
Aim 4: Young People	88%	81%	Strong support across both groups; partners wanted clearer delivery plans, public emphasized inclusion of underserved youth.

Aim	Partners Agreement	Public Agreement	Summary of Differences
Aim 5: Welcome & Access	74%	68%	Partners focused on infrastructure and transport; public highlighted accessibility for disabled and marginalised groups.
Aim 6: Cultural Heritage	69%	61%	Partners noted underrepresentation of built heritage; public engagement was lower, with calls for more inclusive storytelling.
Aim 7: Economy & Communities	77%	64%	Partners supported green economy and housing targets; public expressed concern about overdevelopment and affordability.

3.1.1 As a result of the feedback changes were made to the text of the plan and the targets for each objective. The changes are in the revised PMP which is at **Appendix 3**. Specific changes to the targets are at **Appendix 4**.

4. Assessments

4.1 During the development of the plan, we carried out several assessments: a Habitat Regulation Assessment (HRA), an Equalities Impact Assessment, and a Health Impact Assessment. The HRA is required by European and UK law to protect special sites for wildlife and habitats, including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). These laws include the European Council Directive 92/43/EEC (the Habitats Directive), the Conservation (Natural Habitats) Regulations 1994 (and later amendments), and the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. Any proposals affecting SACs, SPAs, Ramsar sites (important wetlands), or similar protected areas must have an HRA, as these sites are protected by government policy.

4.2 Both Natural England and Historic England approved the scope of the Integrated Impact Assessment (IIA). The IIA report was published alongside the draft PMP and reported to the National Park Authority Meeting on 22 May 2025. The IIA concluded that ... “No significant negative effects are considered likely in the implementation of the PMP that would warrant more stringent monitoring over and above that already undertaken.”

4.3 In their response to the IIA Historic England noting that “We are content that the IIA scoping report for the South Downs Partnership Management Plan incorporating requirements the Strategic Environmental Assessment (SEA) adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets”.

4.4 The response to the IIA from Natural England was as follows “Natural England notes that the National Park Authority, as competent authority under the provisions of the Habitats Regulations, has screened the plan to check for the likelihood of significant effects.

The assessment concludes that the plan can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view”.

4.5 Our consultants AECOM will also produce an adoption statement that will be reported as we adopt the plan.

5. Costs

5.1 Costs incurred so far in the review amount to £93k (stakeholder engagement £69k, Strategic and Environment and Habitat Regulation assessments £19k, consultation platform and AI analysis £5k. This is against a budget of £125k split across 24/25 and 25/26 (£75k allocated in 2024 and £50k allocated in 2025). There will also be additional costs for digital design.

5.2 In addition, a significant amount of staff resource was allocated to developing the PMP. Management and co-ordination were 5 days a week split between the Performance and Projects Manager and the Performance and Learning Officer from December 2024 which will continue until December 2025. Strategy Leads spent around 20 days facilitating meetings and writing content. Communications Team, specifically the Head of Communications and Engagement but also the Communications Officers have spent around 60 days supporting the development of the PMP drafts. There has also been input from colleagues in Planning, attending the PMP project team meetings and reviewing the Planning principles as well as supporting the assessment process.

6. Next steps

6.1 Following this meeting, any changes requested by this Committee will be made to the PMP. A PMP for adoption will be presented to the NPA meeting in December 2025. A partner event is planned to thank contributors and share the final version in early 2026.

7. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	Yes. A report will go the NPA in December 2025 to approve the PMP.
Does the proposal raise any Resource implications?	The financial resource implications are covered in section 5 above. A significant amount of staff time was needed to manage the review and to participate in developing revised outcomes and actions for a delivery plan. Relevant staff had this in their PDRs.
How does the proposal represent Value for Money?	Procurement processes for the consultants engaged have been carried out using MEAT methodology. We can therefore say with some confidence that the best possible value for money has been obtained through that process.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	This relates to PMP outcomes 1,2,3,4,5,6,7,8,9 and 10 and to all three of the corporate plan higher level targets, Nature recovery, National Park for All and Climate Action.
Links to other projects or partner organisations	The review of the PMP is fundamentally a partnership exercise and the revised plan will be a shared set of ambitions, outcomes and an agreed delivery plan with measurable targets agreed with partners.
How does this decision contribute to the Authority's climate change objectives	The PMP will be one of the main strategic mechanisms to support action for climate change mitigation and adaptation. It will incorporate the climate change action plan we already have.
Are there any Social Value implications arising from the proposal?	None
Have you taken regard of the South Downs National Park Authority's equality duty as contained within the Equality Act 2010?	An intrinsic part of the process is the carrying out of an equalities impact assessment. We have also chose to adopt a very inclusive approach to engagement which aims to ensure that as many diverse voices as possible are heard as part of the PMP review.

Implication	Yes*/No
	<p>Specific benefits are listed below:</p> <p>Support for young people (Objectives 4.1 & 4.2): Reduces barriers for underrepresented groups, including those from low-income backgrounds and rural communities, by offering youth programmes and work experience opportunities that build skills and confidence.</p> <p>Improved travel and access (Objectives 5.1 & 5.2): Enhances accessibility for disabled people, older adults, and those without private transport through better active travel routes and inclusive infrastructure.</p> <p>Inclusive visitor experience: Raises awareness of the National Park’s International Dark Sky Reserve status, fostering a more welcoming environment for diverse visitors.</p> <p>Affordable, accessible housing (Objective 7.2): Supports housing affordability for young people, disabled residents, seasonal workers, and lower-income households, preventing displacement and promoting local community sustainability.</p> <p>Integrated accessibility in housing: Ensures new housing designs consider accessibility, strengthening equalities and inclusion within the National Park.</p>
Are there any Human Rights implications arising from the proposal?	None
Are there any Crime & Disorder implications arising from the proposal?	None
Are there any Health & Safety implications arising from the proposal?	H&S risk assessments were carried out for engagement with groups. The Engagement consultants were required to ensure that all staff working with vulnerable people are DBS checked and were aware of the SDNPA safeguarding policy.
Are there any Data Protection implications?	Data protection principles were followed when dealing with personal data. Provisions on data protection for consultants are a standard part of the procurement process. The consultation platform and AI analysis contract specifically met our requirements for the protection of personal data.

8. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
Lack of buy in from partners	2	3	<p>Huge efforts went into developing an approach which is inclusive and inspiring for partners. Section 245 of the LURA introduced a requirement for some organisations to seek to further SDNPA purposes and duty and participation in the PMP process goes some way to demonstrating that.</p> <p>The Steering Group was a good way of getting further commitment from key partners. This,</p>

Risk	Likelihood	Impact	Mitigation
			along with the extensive input from SDNPA staff and Members over the summer consultation period has resulted in a good degree of buy in from partners and commitment to endorse the plan from some.
Failure of contractors to deliver agreed contracts	3	3	Strong performance management and contract management processes and KPIs were in place.
Significant change in Government guidance or policy	3	3	<p>Developing an understanding of government policy and drivers for change which is integrated into the process will help mitigate this risk but if things fundamentally change then the plan review may need to be put on hold or completed in a different way.</p> <p>SDNPA staff and Local Authority staff in particular were well aware of the complexity of launching a long-term vision and 5 year plan into an environment where there will be reorganisation of local Government during the lifetime of this plan. As far as it is possible getting commitment to an ongoing partnership to oversee delivery of the PMP will help to mitigate this risk.</p>
Lack of resource to deliver the plan	2	4	SDNPA will ensure that it is best placed to deliver on its commitments in the PMP through a focused Corporate Plan that sets clear organisational targets for delivery of PMP overall targets and will ensure staff resources are aligned to delivering priorities.

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Appendices

1. Terms of reference and membership of the Steering Group
2. Report of consultation
3. Revised PMP
4. Summary of changes to targets

SDNPA Consultees

Chief Executive; Director of Landscape and Strategy; Director of Planning; Chief Finance Officer; Head of Governance and Monitoring Officer; Legal Services.

External Consultees	None
Background Documents	Report to P&R 19 September 2024 – Approval of approach to PMP Report to NPA on PMP approach October 2024 Report to NPA May 2025 Draft Plan approved for consultation National Paks and Access to the Countryside Act 1949 Environment Act 1995 Natural Environment and Communities (NERC) Act 2006 UK Environmental-improvement-plan Natural England Draft Management Plan Guidance for Protected Landscapes in England Planning the journey to a visionary future; a review of the South Downs National Park Partnership Management Plan development process. Heritage Insider - September 2020