

South Downs  
Local Access Forum

**South Downs Partnership Management Plan (PMP): consultation response**

Thank you for consulting the Local Access Forum on this matter.

This letter constitutes formal advice from the Forum and, as you will be aware, in accordance with Section 94(5) of the Countryside and Rights of Way Act 2000, the National Park Authority is required to have regard to advice from the Local Access Forum in carrying out its functions.

The Forum considered the Partnership Management Plan at its most recent meeting and the points in this letter cover those views as well as reiterating comments made during the PMP process.

It is noted that the Forum had submitted a detailed letter to SDNPA on 7<sup>th</sup> March as a response to that earlier consultation phase of the project when it was hoped that the points being made would be helpful in the subsequent phases of the review during which priorities were due to be discussed, and lead partners identified. There is some disappointment that important matters raised in early March have not yet been addressed in the Draft PMP.

**The SDNPA's engagement, consultations and research have confirmed a number of points made by the Local Access Forum:**

- Access into and within the National Park is highly valued and particularly important for young people, diverse groups and for mental and physical health & wellbeing benefits as well as enabling people to understand and enjoy the special qualities of the National Park (the second statutory purpose of all National Parks).
- Access is, however, acknowledged to be increasingly difficult in many parts of the National Park because of a lack of public transport and decreasing amounts of path maintenance as local authority budgets are cut.
- The SDNPA's consultants' report stresses (in over 20 places) that Public Transport is poor: with wide-ranging and far-reaching adverse effects (including Net Zero ambitions). It cites "Little involvement of transport operators" and explains that these views come from Diverse groups, Young people, Rural businesses, the Learning Network and Partners as well as from Communities and NPA staff.
- Issues which act as barriers to the use of the rights of way network within the National Park are also identified throughout the engagement including safety (and feeling safe), lack of information, lack of confidence and conflicts between users: 49% of the free-text comments that were about access in the PMP's on-line survey cited dangerous byways as a barrier for walkers and cyclists

- These findings chime with conclusions from the Government’s review of National Parks (the Glover Review) which stated that “traffic spoils tranquillity and poor access keeps people who should be able to visit away.”
- The engagement and consultation reports conclude that there are needs to improve both Access and Public Transport.

**Other salient findings from the engagement, consultations and research include:**

- Partner engagement in delivering the current PMP has been poor. It is explained that “the PMP feels like an SDNPA strategy rather than a partnership document and key partners don’t seem fully engaged” and “the SDNPA should be seen as the glue that brings together partners to take action” with “the next PMP should clearly indicate who is responsible for delivering each part.”
- The reports also explain that there have not really been any targets, nor any consistent quantitative data to evaluate progress of the existing PMP over the last 5 years. It is stressed that the next PMP should have clear targets and monitoring with all targets needing to be meaningful and measurable. It is said that the SDNPA’s Annual Reviews and websites pages “are published to celebrate achievements, rather than as evaluation documents, and whilst they demonstrate many excellent initiatives by the SDNPA and partners, they do not highlight gaps or where work has been less successful.”
- These findings appear to be true for Rights of Way and Access matters: Outcome 5 of the current PMP aimed to create a National Park for All, to improve accessibility through a network of high quality rights of way and to encourage sustainable access into and around the National Park by encouraging the retention and expansion of rural transport services. Whilst there has been some progress with a ‘Miles Without Stiles’ initiative (seven short routes are identified on the SDNPA’s website amongst the 3,300km of public paths) and a project to extend the Centurion Way continues as part of a network of strategic routes, it is difficult to assess overall progress because of the apparent absence of indicators, lead partners or evaluation.
- The previous PMP (2014-19) had noted that pressures on rights of way in popular locations and conflicts between different recreational users were increasing and needed to be addressed. Those issues were included in Policies 28-30 of that PMP and were included in a number of Delivery Areas in an Appendix. Actions identified included ‘the development of consistent reporting on conditions of rights of way’ and ‘working with partners to develop an agreed approach where conflicts exist on Byways Open to All Traffic’. Partners were identified for each action. Ten years later, whilst there has been progress on some specific rights of way (South Downs Way, Serpents Trail, Egret’s Way etc), it is not clear whether there has been progress on the other actions.

**The current draft PMP includes the following points about access:**

- Rights of Way in the National Park “provide access to nature, green space, health and wellbeing opportunities, dark night skies, a living classroom for young people, and much more” and “access also has an important role to play in supporting the local economy and in helping us to reach Net Zero.”
- “A key focus for us to benefit people, nature and the planet, is to provide better access from the urban fringe, supporting people to access the National Park by public transport or active travel – cycling, walking and horse riding.”
- It is acknowledged that a lack of public transport is a problem with many areas being without any train or bus services at all and that “public transport – or a lack of public transport – continues to be a barrier for many people to visiting and enjoying the National Park.”
- The draft PMP also says: “we are working with partners to change this” and that “the Authority is committed to continuing to work with our partners to find ways to improve and expand the public transport network into and around the National Park.”
- Intriguingly the document states that “Providing public transport is the responsibility of partner local authorities ...”. There seems to be no recognition of the role of bus or train operators, nor of community transport options or other ideas promoted in CNP research.
- The document also says that “The Authority is hopeful that devolution will provide opportunities for public transport issues to be addressed in future Partnership Management Plans.” But the next Management Plan will be at least 5 years away (2031) and it is felt that there should be some commitment to address this issue over the next 5 years (2026-31).

**The draft PMP does not adequately address:**

- The decreasing amounts of path maintenance as local authority budgets are cut (this deters potential users and could, inadvertently and gradually, result in the loss of some paths if they were to remain in poor or overgrown condition year after year. The National Park Authority could work with local authorities (and other partners) to press Government for special extra funding within National Parks and/or to seek funding from other sources.
- A number of the other barriers to the use of the rights of way network such as safety (and feeling safe), lack of information, lack of confidence and conflicts between users.
- The SDNPA and partners should be looking to attract potential new users to the rights of way network and this may require new policies if people are being discouraged by danger or safety issues. This can be particularly important for vulnerable users and for health & wellbeing improvements.
- Local authorities should have special regard to the National Park with different policies being applied inside the National Park (and into it) compared with other parts of their

Counties. These should encompass retaining amenity, character, heritage, nature and habitats as well as the quality of the rights of way and access network.

- Improving collaboration between the County Councils and the National Park Authority so as to address a number of these issues, improve access for under-represented groups and increase opportunities for social prescribing initiatives. These enhancements could potentially attract funding from a range of sources.
- Partnership working to help make car-free travel easier into and within the National Park: improving collaboration not only with local authorities but also with bus and train operators, community transport options and visitor destination attractions to explore how best to retain all existing services (by helping to increase patronage) and how to improve the levels of bus services, including at weekends.
- The targets for Objective 5.1 of the PMP (which aims to improve the accessibility of the National Park to enable everyone to connect with nature and cultural heritage) are inadequate to measure the changes being sought – most particularly, but not solely, by the absence of any target at all for public transport.

## **Improvements to the proposed Targets**

### Omissions to be considered for inclusion as Targets

- The targets for Objective 5.1 of the PMP should include at least one Target for public transport [see also a later section of this letter]. The draft PMP acknowledges that a lack of public transport is a problem with many areas being without any train or bus services at all and that “public transport – or a lack of public transport – continues to be a barrier for many people to visiting and enjoying the National Park.” But there is not a single proposal or Target to address this situation and it does not appear as though any partners have been engaged on this matter.
- An examination of Partnership Management Plans for other National Parks in the country, suggests that they all have at least one objective about public transport (either as part of their ‘net zero’ aims or their ‘access for all / inclusive’ aims). The South Downs should not be the only National Park in the country without such a target.
- The Targets for access in Objective 5.1 fail to include any attempt to report on conditions of Rights of Way (eg. percentage of routes in good condition etc) which is an important issue included in previous PMPs and which partners should be able to monitor. Consistent reporting on conditions of rights of way is required.
- Another Target which has been omitted is reducing conflict where it occurs. This has been included in both the previous PMPs and should be included again. 49% of the free-text comments that were about access in the PMP’s on-line survey cited dangerous byways as a barrier for walkers and cyclists. Some progress against this aim is being made but recent Local Authority Access Plans recognise that it is still a concern (for both users and landowners). It is, therefore, something which the Local Authorities are

likely to continue to pursue and hence this could be a useful contribution to the PMP. Adding it back into this draft PMP would not require the SDNPA to deliver anything, it would be for Local Authorities to address (and it could be useful to ensure that they think about these issues from the beginning of their new (post-devolution) arrangements).

- There should be a more significant commitment to improving accessibility, including: expanding references to ‘stirle-free routes’ into more inclusive ‘accessible routes’ programmes (co-designed with user groups) as well as ensuring that information materials are produced in accessible formats (large-print, easy-read) and that digital mapping tools highlight accessibility features.
- None of the Local Authority partners responsible for Rights of Way appear to have any bespoke guiding principles or delivery strategies for the National Park: they all appear to adopt a universal / county-wide approach to their RoW management, with no higher standards in the National Park. If the National Park does not look or feel different in this regard, some may question why a National Park has been created and what it is for? The strengthened statutory duty under Section 245 of the Levelling-up and Regeneration Act 2023 now requires all public authorities to “seek to further” the statutory purposes of National Parks and this is particularly pertinent here. The PMP should aim for County Councils to adopt higher standards within the National Park (developed in collaboration with others), in recognition of the statutory purposes and special qualities of the area. This could include enhanced maintenance regimes, a greater emphasis on accessibility and sensitive infrastructure upgrades that respect landscape character and meet public expectations. At present a de-prioritisation of routine maintenance (particularly through reactive rather than scheduled vegetation cutting) can be leading to a deterioration in the usability and attractiveness of the wider network. A proactive maintenance programme within the National Park should be sought: to maintain high standards and ensure that the network remains welcoming and functional.
- With Strategic Mayoral Authorities due to be created in Hampshire and Sussex in 2026 (presaged as bringing powers and resources for their communities) this could be a timely opportunity for SDNPA to review and revise the ‘RoW & Access Accord’ (currently jointly signed by the four Local Authorities) to encompass a number of the issues identified above. The revision of the Accord, including an outline of the issues that it should address, could be a useful Target for inclusion in the Partnership Management Plan.

#### Comments on the six Targets included in the draft PMPt

- Target 5.1a seems to be trying to cover four things: ‘improving accessibility’, ‘improving engagement’, ‘promoting accessibility’ and ‘promoting engagement’. Whilst it is appreciated that this is a PLTOF indicator, these seem to be four different things and it is unclear what will actually be measured (and by whom). Perhaps better guidance is required from Defra?

- Target 5.1b seeks “25 kilometres of accessible path”. This is not a very meaningful target without any context (eg. how many kilometres there already are, out of the 3,300 km in the National Park). This could be perceived as a low target. Is it solely a target for SDNPA to deliver itself? Or, is this the total that is being sought across the entire National Park over the five-year period, including those delivered by all partners (eg. Local Authorities, National Trust, other landowners etc)?
- Target 5.1c seeks “50 gates/stiles have been made more accessible.” Here again, this is not a very meaningful target without any context (eg. how many gates/stiles there are in the National Park). Is 10 per year adequately ambitious for the combined efforts of the local authorities, Ramblers Association, Friends of the South Downs, volunteer groups, Parish Councils and SDNPA Area Teams etc?
- Target 5.1d seeks “2,500 visits to the National Park facilitated by funded equipment by 2031”. It is unclear what this means. What is “funded equipment”? Is it Trampers (and similar)? What is significant about whether they are funded or not? What if they were donated – or hosted by visitor attractions? It will also be important to be clear about what counts as “a visit”: are they new visitors – or repeats?; are they reaching new audiences (which is presumably part of the aim / intention)? How will these visits be measured / monitored?
- Target 5.1e seeks “5 easy access routes”, but it is not clear what this terminology means. Some context needs to be provided to explain how many such routes there are now. Five routes seems to be a very small target out of 3,300 km of Rights of Way. It is also unclear what would be required to convert an existing Right of Way (or circular walk) into an ‘easy access route’? Is it simply improved wayfinding?
- Target 5.1f: appears to be simply asking “key partners” (not defined) to “consider or adopt the active travel plan”. But it is not clear what the active travel plan is? Is it an SDNPA plan? As currently drafted, considering it but not doing anything about it would still meet the target? Do other organisations (eg. local authorities) also have active travel plans? What if they’ve already adopted their own? This Target is somewhat unclear ...
- It is often unclear whether Targets in the PMP are solely for the SDNPA to meet/deliver. Allied to the perception that many parts of the draft PMP read as though it is an SDNPA strategy (rather than something for partners to be helping to deliver), this could encourage similar reactions to those that have dogged the current PMP.

In summary it is felt that the six Targets (a-f) included in the draft PMP are unlikely to be able to indicate with clarity whether or not there is a network of high quality rights of way in the National Park with significant improvements in improving accessibility and reducing conflicts. Nor are they likely to encourage significant actions / activities by partner

organisations. It is recommended that Targets suggested in the bullet point list about omissions (above) should be incorporated into the final version of the PMP.

### **Some possibilities for Public Transport**

It had been suggested that a provisional Target could have been included in the current draft version of the Partnership Management Plan explaining that there would be at least one Target relating to Public Transport in the final version, drawing upon discussions with a range of partner organisations and comments received during this current consultation period. It was felt that this approach could have increased the likelihood of developing a useful initiative and potential targets over the following few months. This idea was not, however, adopted and the Forum therefore hopes that meaningful liaison with the full range of potential partners is currently taking place to fully inform the best potential Targets for inclusion in the final version of the PMP later in the year.

In the meantime, members of the Forum offer the following contributions:

In recent years all four Local Transport Authorities with public transport powers covering parts of the National Park have formed 'Enhanced Partnerships' (EPs) with operators of local bus services. These partnerships are a key part of the Government's strategy to enhance bus services and are designed to deliver improvements outlined in a Bus Service Improvement Plan (BSIP). Funding to develop and implement BSIPs is available from the Department for Transport.

These partnerships bring local authorities, bus operators and others together to improve bus services through steps designed to make bus travel cheaper, easier, and more attractive, particularly for young people. Initiatives to enhance aspects of bus travel have included some new bus services, improvements to service frequencies, ticketing, subsidised and free travel options, bus priority measures and accessibility.

Enhanced Partnerships are already showing that they are a useful way of improving services, drawing upon the consideration of challenges and opportunities by all the participants. Bus operators have been empowered to be more actively engaged in the areas where they provide services and local authorities can establish specific requirements for bus operators.

The Forum is not clear whether SDNPA has, to date, taken part in the deliberations of any of these Enhanced Partnerships – to explain and promote the needs and opportunities of the National Park. But it is likely that its sub-regional presence, knowledge and responsibilities would be welcomed by all the other participants – including its abilities and opportunities to encourage people to use buses via marketing campaigns.

It is therefore suggested that, rather than creating any other sort of new partnership to address public transport issues in the National Park, the SDNPA should use the existing EPs

so as to be able to influence the contents of BSIPs, the bids to Government and how / where funding is spent.

The SDNPA would be well-placed to identify a range of visitor attractions and community organisations across the National Park which could have roles in promoting existing bus services (to sustain their viability) as well as identifying new opportunities and improvements to feed into the existing Partnerships and into the BSIP's submissions to Government for funding.

The SDNPA could also bring the Community Rail Partnerships (and their funding) to the table as well as experience from other National Parks, from CNP research and from community transport organisations – all of which could enhance the prospects of success.

At present ticketing schemes often either sit within local authority boundaries or individual bus company territories which is disadvantageous to passengers wishing to undertake cross-boundary journeys within the National Park. And the 'PlusBus' scheme for unlimited bus travel when added to the purchase of train tickets barely offers any opportunities in the National Park: it appears to be limited to a few routes close to only a proportion of the rail stations in the vicinity of the National Park (unlike opportunities in some other National Parks). The involvement of the SDNPA in the existing 'Enhanced Partnerships' may be able to bring about integration improvements to all these schemes - and to encourage more.

The SDNPA had played a valuable role in promoting public transport about a decade ago (2013 - 16) but this appears to have stopped just when it might have been needed most. The Authority had supported bus travel campaigns to help generate passenger numbers – with much of the marketing aimed at new audiences who did not usually travel by bus. This was highly successful, especially on the 'Breeze' network from Brighton.

A popular 'Visitor Attractions by Bus' campaign was also developed with widespread advertising of a 2-4-1 campaign (including videos, posters, leaflets, on-bus and at bus stops ads) which was generally well received with all the attractions saying that they would take part in similar campaigns in the future. Some seasonal Sunday and Bank Holiday services were also funded and the South Downs Discovery Ticket was created, involving all the operators in the area. The tickets were valid outside the National Park so that people travelling from urban areas beyond the boundaries could benefit.

The South Downs Discovery Ticket is still listed on the SDNPA's website but a number of the hyper-links to bus operators appear to be broken, active promotion of the ticket seems to have ceased and it is understood that not all operators issue or accept the tickets.

With Strategic Mayoral Authorities due to be created in Hampshire and Sussex in 2026 (presaged as bringing powers and resources to ensure that transport systems work for their

communities) it should be a timely opportunity for SDNPA to help and influence the new organisations to ensure enhancements for rural residents and visitors to the National Park.

It is hoped that some of these ideas might inspire the SDNPA to agree some suitable PMP Targets for Public Transport with all relevant partners (including demand-responsive options) to (a) aim to retain existing levels of service by helping to improve perceptions of public transport, attract new passengers and increase patronage; (b) to improve the levels of bus services, especially at weekends; and (c) to monitor passenger data on every route in the National Park every 3 months to help identify trends and opportunities. Another valuable specific target could be to aim for all key access points on the South Downs Way National Trail to be accessible by public transport seven days-a-week, with ongoing marketing and promotional campaigns to sustain and grow all the bus services involved.

As explained elsewhere, an examination of Partnership Management Plans for other National Parks suggests that they have at least one objective about public transport (either as part of their 'net zero' aims or their 'access for all / inclusive' aims) and it is hoped that the South Downs would not wish to be the only one without targets for public transport.

It is hoped that these contributions are helpful to you as you amend and finalise the Partnership Management Plan.

Yours faithfully,  
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On behalf of  
**Doug Jones**  
**Chair of the South Downs Local Access Forum**

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