

The Rt Hon. the Lord Benyon
House of Lords
London
SW1A 0PW

31st March 2022

Dear Lord Benyon,

South Downs National Park response to Defra Consultation on the Glover Review

I attach a print out of the South Downs National Park Authority's response to Defra's consultation on the Glover Review. This has been developed by our Members in a workshop and approved by our NPA. You will see that SDNPA broadly welcomes the ambitions in your Department's response, particularly around nature recovery and access for all.

We fully support the case for legislation to strengthen S62 and extend the power of competence and hope this can be done at the earliest opportunity. These modest legislative changes would accelerate delivery of the ambitions for Protected Landscapes (PLs) set out in the consultation at no net cost to the public sector.

SDNPA welcome the promised greater role for NPAs in ELMS. FiPL has already shown that we can efficiently deliver cost effective, outcome focused and farmer led support on the ground. We would like Defra to work with us to build on this success as you shape the Nature Recovery element of the new system of agricultural support.

SDNPA endorse the commitment to "explore ways for PLs to support responsible authorities in preparing and delivering LNRs" but this is too vague and does not seem to align with Defra guidance on the Strategies. Glover said that PLs should be "the backbone of Nature Recovery Networks" and we would urge Defra to promote this recommendation. Urgent guidance from Defra is required to explain exactly how PLs can take a leading role in the development of LNRs.

Whilst therefore there is much to welcome, SDNPA has serious concerns over the growing gap between increased expectations and the reducing ability of NPAs to deliver following an anticipated three years of flat cash settlements from Defra. The settlement will require us to make significant cuts in our staff team in order to ensure that we retain the ability to deliver projects, yet the Department's response demands significantly more from this reducing complement. The Glover review said at the outset "we recognise that any increase in ambition will need to be matched with funds" (p22). It is therefore essential to secure grant funding at least in real terms over the CSR period to allow NPAs to meet our shared aspirations.

Given the importance the Government attaches to nature recovery and climate change it is disappointing that the response contains no specific proposals to help National Park Authorities take a lead on these issues. This is a huge missed opportunity. SDNPA's rapid progress in this area merits active support from Defra. Our #ReNature campaign, which was launched in November alongside COP26, has already raised £350k and the associated call for sites has generated 70 EOIs. In addition we have undertaken work to develop our Climate Change Action Plan, mainstreaming the ideas of 'Net Zero with Nature' and tackling the twin challenges of Nature Recovery and Climate Action. We have worked with the wider National Parks family to establish the NPAs in a leadership role, and to set ambitious targets of 'Net-Zero' for the National Park Authority by 2030; and the National Park as a whole by 2040. We are working with our local communities to help them become more resilient; supporting the development of community-based energy projects and

to drive a rapid transition to a low-carbon future. This work is, however, heavily dependent on staff time, so real terms grant reductions threaten our progress.

We welcome the proposed new Partnership as a stronger voice for PLs on the national stage and an additional source of best practice, training and income generation. SDNPA is, however, already successful at raising external finance, with £1.4m raised from grant, private and philanthropic sources in 2021/22, plus a further £2.5m in CIL. This is chiefly allocated to specific project deliverables since our experience is that it is extremely difficult to persuade third party donors to cover the operating costs of public bodies. We do not have significant land holdings so we are not in a position to generate much additional income through environmental credits, although we are working with partners across the National Park to maximise the benefit for our landowners.

External finance can never be the answer to the revenue funding crisis since it is labour intensive to attract and deliver whilst rarely supporting running costs. It extends the scope of NPA operations whilst placing ever greater pressure on our diminishing staff team. The frequent references in the Defra response to the scope for attracting private finance fail to recognise this point. Increased private finance is a function of increased government grant, not a substitute for it.

We acknowledge that improvements can be made to the way NPAs operate and believe that it is a priority to increase the diversity of our NPAs, staff and programmes. There cannot, however, be a one size fits all response to the governance issues raised in the review and consultation document. Local circumstances must be taken into account when considering changes that will impact upon the operation and governance of individual Authorities. The SDNPA's geographic extents and representation enable productive relationships with a wide range of other public bodies and partner organisations.

SDNPA already work closely with the AONB family through South East and East Protected Landscapes, (SEEPL), which was quoted as good practice in the original Glover Review (p64). We would like to build on this model to further assist our neighbouring AONBs, making NPAs the central point for regional Nature Recovery Networks of PLs, but this would require the active support of your Department.

SDNPA would be happy to expand further on any of the points in this letter or the attached response. We would welcome further dialogue with you and other Ministers and would be very pleased to host a visit at any time to show you the progress we are making on the ground with our communities and partners.

Yours sincerely,



Ian Phillips
Chair
South Downs National Park Authority

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: chair@southdowns.gov.uk

www.southdowns.gov.uk

Chief Executive: Trevor Beattie

