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Submitted to Government response to the Landscapes Review
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About you

1 Do you want your responses to be confidential?

No

If yes, please give your reason::

2 What is your name?

Name:
Dame Clare Moriarty

3 What is your email address?

Email:
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4 Where are you located?

South East

5 Which of the following do you identify yourself as?

Other

If other, please identify below::

Clare Moriarty as Chair of the South Downs Partnership The South Downs Partnership is an independently chaired, stakeholder group working alongside the South Downs National Park Authority to champion and help deliver its Landscape Management Plan. It comprises fifteen experienced individuals, drawn from sectors and networks including biodiversity, landscape, access, diversity, education, volunteering, communities, landowners and businesses.

A stronger mission for nature recovery

6 Should a strengthened first purpose of protected landscapes follow the proposals set out in Chapter 2?

Unsure

Please give reasons for your answer: :

The case for changing the wording of Purpose 1 should be that the current version acts a barrier to ambition. The phrase Conserve and enhance is well tested and robust, and we note that the SDNPA already has a strong focus on nature recovery (evidenced by its ReNature Campaign and 33% target) and on climate change (Net Zero for the National Park as a whole by 2040). So reopening the debate about Purpose 1 carries the risk of diluting rather than strengthening it.

7 Which other priorities should be reflected in a strengthened first purpose e.g. climate, cultural heritage?

Please give us your views:

See above

Agricultural transition

8 Do you support any of the following options as we develop the role of protected landscapes in the new environmental land management schemes? Tick all that apply.

Monitoring the effectiveness and uptake of the new environmental land management schemes in protected landscapes. Using this to inform whether further interventions are needed to ensure we are on track for wider nature recovery ambitions., Creating a clear role for protected landscape organisations in the preparation of Local Nature Recovery Strategies. Our recent LNRS consultation specifically asks for views on the role of different organisations in the preparation of LNRSs, including protected landscapes., Building on FiPL, empowering protected landscapes to support decision-making and delivery against agreed priorities, including through dedicated project coordinators and advisers.

9 Do you have any views or supporting evidence you would like to input as we develop the role of protected landscapes in the new environmental land management schemes?

Please give us your views:

We note the strengthening and reinvigoration of Natural England, but are unclear how much of this renewed vigour will be directed at improving biodiversity within the SDNP and enhancing existing activities such as management of SSSIs and NNRs within the National Park.

Likewise, the move to ELM nationally is welcome, but farmers within the SDNP require a more tailored and bespoke support, built on trust and on valuing what has already been achieved by land managers through their detailed local understanding of biodiversity and quality of landscape, if they are to be at the forefront of nature recovery.

Enhanced delivery of nature recovery and climate action in the SDNP needs strong local ownership and empowerment. Our farmers have been very proactive working with the SDNPA through Farm Clusters and in delivering FiPL, so their voice is heard and they can be part of the solution. FiPL is a good pilot for this approach which has been very successful. Whilst LNRS may help, what is urgently needed is not more strategy but a stronger set of mechanisms and clear advice available to land managers to support proposals which can be viable and sustainable as part of their core business.

A stronger mission for connecting people and places

10 Should AONBs have a second purpose relating to connecting people and places, equivalent to that of National Parks?

Unsure

Please give reasons for your answer: :

Not qualified to answer

11 Should a strengthened second purpose of protected landscapes follow the proposals set out in Chapter 3 to improve connections to all parts of society with our protected landscapes?

Unsure

Please give reasons for your answer: :

As with Purpose 1, we feel there is a high bar to justify changes in Purpose 2. As set out it has not prevented the SDNPA from actively pursuing projects in outreach, diversifying volunteering, education and health & wellbeing. This work is limited not by level of ambition but often by the capacity of local organisations to scale up their work and offer more to underrepresented groups.

If it is considered worthwhile to strengthen Purpose 2 then it should be more explicit about diversity and underrepresented groups. We need to attract a much wider range of people into PLs, enabling them to feel welcomed, to benefit and to help look after them. For example, the SDNP is next to over 2 million people and can provide many benefits - including jobs, clean air, fresh water, physical exercise and health & wellbeing improvements to people who often feel unsure or excluded. We would like to see far more emphasis by Defra, DLUHC, DfE, DCMS and others on changing the narrative: empowering underrepresented communities around PLs to value them and building bridges between those who live and work in them and those who visit and can benefit from and contribute to them.

12 Are there any other priorities that should be reflected in a strengthened second purpose?

Please give us your views:

See above

Managing visitor pressures

13 Do you support any of the following options to grant National Park Authorities and the Broads Authority greater enforcement powers to manage visitor pressures? Tick all that apply.

Please give reasons for your answer: :

Whilst we recognise that there is a case for more powers for PLs to tackle anti-social behaviours in specific places and circumstance, we are very disappointed that this appears to be the key priority in Chapter 3. The measures consulted on (TROs etc) should be a last resort, would require additional resources for the SDNPA to implement them effectively and fairly and, if applied, should be used in a way to ensure no discrimination.

14 Should we give National Park Authorities and the Broads Authority and local highway authorities additional powers to restrict recreational motor vehicle use on unsealed routes?

Unsure

Please give reasons for your answer: :

See above

15 For which reasons should National Park Authorities, the Broads Authority and local authorities exercise this power? (select all that apply)

Other (please state):

If considered the primary issue should be improving access for those less able to visit the countryside

16 Should we legislate to restrict the use of motor vehicles on unsealed unclassified roads for recreational use, subject to appropriate exemptions?

Unsure

Please give reasons for your answer::

See above. We do not consider this issue to be the most important or urgent in terms of increasing the value of PLs to underrepresented groups

17 What exemptions do you think would be required to protect the rights and enjoyment of other users e.g., residents, businesses etc?

Please give us your views:

Those for whom access is difficult and limited at present

The role of AONB teams in planning

18 What roles should AONBs teams play in the plan-making process to achieve better outcomes?

Please give us your views:

N/A

19 Should AONB teams be made statutory consultees for development management?

Unsure

Please give reasons for your answer::

Outside our remit

20 If yes, what type of planning applications should AONB teams be consulted on?

Not Answered

Other (please state):

The SDNP sits within a local family of PLs in the SE, most of which are AONBs. Working as a network is essential to unlock the wider benefits these landscapes can provide to society. We are therefore supportive of giving AONBs a stronger remit and better funding, but this must not come at the expense of our two National Parks (SDNP and NFNP) or there is no net gain for PLs. Similarly, whilst the name "AONB" is poorly recognised, we are not convinced that the term 'National Landscapes' is helpful - since NPs aren't distinguished from AONBs on the basis of "parks" v "landscapes".

Local governance

21 Which of the following measures would you support to improve local governance? Tick all that apply.

Improved training and materials, Streamlined process for removing underperforming members, Greater use of advisory panels, Merit-based criteria for local authority appointments

Other (please state):

Much greater diversity represented on PL Boards

Please give reasons for your answer: :

We note that those running PLs remain unrepresentative of wider English society and that, despite pockets of good practice, the lived experience on their Boards is narrow. This is a social justice issue but also limits support for PLs and hampers them in serving their communities. We would like to see stronger action on diversity for PL Boards and we support the proposals to give their members more training and hold them better to account.

A clearer role for public bodies

22 Should statutory duties be strengthened so that they are given greater weight when exercising public functions?

Yes

Please give reasons for your answer: :

We are very supportive of the idea of strengthening Section 62 This is crucial to ensure that the flows of money into PLs (the places not the NPAs/AONB units) from other public bodies always supports, and never undermines, the purposes for which these landscapes were designated. For example,

strengthening the Duty on bodies such as Local Highways Authorities, Power Networks and Water Companies would make a significant difference.

23 Should statutory duties be made clearer with regards to the role of public bodies in preparing and implementing management plans?

Yes

Please give reasons for your answer: :

s.62 needs to be stronger. For example, Chapter 2 contains many references to existing England-wide Government initiatives on biodiversity and climate, but none of these are specific to PLs. The same was true of previous initiatives such as Biodiversity Action Plans, Local Biodiversity Partnerships, Nature Improvement Areas, and Local Nature Partnerships. Though worthy, these were not sufficient to halt the decline of biodiversity within PLs let alone put them in the forefront of nature recovery. As England's premier landscapes we would argue that PLs justify bespoke mechanisms for nature and climate so that this 25% of the country can become a pioneer and exemplar.

General power of competence

24 Should National Parks Authorities and the Broads Authority have a general power of competence?

Yes

Please give reasons for your answer: :

A general power would assist NPAs to generate more income but this should be put in context and not exaggerated. The level of core funding for PLs is not enough to match the level of ambition proposed for them. Existing spend by the SDNPA delivers lots of benefits and is very efficient as often used to leverage partnerships and other types of investment. Small increases in funding would bring multiple benefits but without this there is a real risk of setting PL bodies to fail.

The consultation is over reliant on private finance to fill the gaps in the public sector, which we feel represents an abdication of responsibility. Caution is needed about the level of private finance coming into any public sector body and the consequent risk of distorting its priorities. Like all rural areas, our PLs are being affected by a long-term decline in rural services, which represents death by a thousand cuts and risk hollowing out their communities so only the rich, retired and car owners can live there. This cannot be remedied solely by exhorting PL bodies like the SDNPA to be more commercial (especially given the progress already made on this) but needs structural change to give the area within the National Park a higher priority across mainstream public services.

Overall

25 If you have any further comments on any of the proposals in this document, please include them here.

Please give us your views:

We are glad Defra is now consulting on its proposals in response to the Landscapes Review. We support the strengthening of Section 62, enhancing the role of Management Plans, and giving NPAs a General Power of Competence. We support the idea of a National Landscapes Partnership so long as it adds value to, not replaces, local action and leadership. Whilst not against the strengthening of the two NP Purposes, we note that to date they have served PLs well, are understood in the planning process and, in the South Downs, have not acted as a barrier to innovation. Any change would therefore have to be a very significant improvement to be worth the risk of reopening the debate.

The environmental, social and economic external pressures on PLs are now so great that they urgently need stronger bespoke tools, and enhanced funding, to manage them. Given constrained public finances, the integrated approach of the SDNPA delivers multiple benefits efficiently and represents outstanding value for public money. We are therefore disappointed to see so little in the consultation about additional tools and resources. This creates the real risk of ramping up expectations on PL bodies without the resources to back them up.

Chapter 2 refers to Government initiatives on biodiversity and climate, but none are specific to PLs. Previous initiatives such as Biodiversity Action Plans, and Nature Improvement Areas, though worthy, were insufficient to halt the decline of biodiversity within PLs let alone put them in the forefront of nature recovery. As our premier landscapes, PLs need bespoke mechanisms so that this 25% of England can become an exemplar.

The proposals for people and place seem to lack the breadth of vision and sense of urgency of the Landscape Review, which set the challenge to engage a much wider range of people with PLs including those who often feel unsure or excluded. Two million people live next to this National Park, which can improve lives through jobs, clean air, fresh water and opportunities for improving health & wellbeing. So, whilst stronger powers on Green Lanes and TROs may be needed as a last resort in specific cases, we would prefer to see far more emphasis on positive engagement. Defra should work with DfE, DLUHC, DCMS and others on changing the narrative: empowering underrepresented communities to value PLs, and building bridges, to mutual benefit, between those who live and work in them and those who visit.

The SDNPA and its partners actively pursue projects in outreach, volunteering, education, health & wellbeing - limited not by level of ambition but the capacity of local organisations to scale up their work and offer more to underrepresented groups. Moving from the deficit model to active, positive, engagement requires investment in physical infrastructure and better places to 'be' - such as toilets, cafes, picnic benches, affordable accommodation and public transport. It is good to see Generation Green listed as a success but many Landscapes Review proposals - such as on education and 'a night under the stars' for every child - seem to find little tangible response in the consultation. Our young people need access to high quality educational experiences in PLs as never before, but schools and families have less time and less money in pocket, so extra resources are essential.

Like all rural areas, our PLs face a long-term decline in rural services, which risks hollowing out their communities so only the rich, retired and car owners can live there. This cannot be remedied by exhorting bodies like the SDNPA to be more commercial but needs structural change to give the area within

the National Park a higher priority across mainstream public services. For example, decent public transport is vital, and transport plans currently marginalise many who could benefit from the SDNP. Nationally, the budget for Bus Improvement Plans has shrunk from £3bn to £1.4bn, and locally it is unlikely that any of this will reach the services which are essential for people without cars to travel in or out of the SDNP for work or leisure.

Despite some progress, those running PLs are still very unrepresentative of wider English society and the current lived experience on their Boards is narrow and white/male /able/class-bound. This is a social justice issue but also narrows engagement with and support for PLs, hampering them in serving their communities. We would like to see clear diversity targets for PL Boards and we support the proposals to give PL members more training and hold them better to account.

We agree there are opportunities to secure private inward investment for these landscapes – especially for nature recovery and net zero. But this does not apply to all parts of their remit and cannot substitute for core funding for the PL bodies themselves. Private finance is unlocked, and effectively targeted, by virtue of sustained partnership working, co-creation of local initiatives, and provision of advice and support for farmers, businesses and communities. This catalytic role is a key strength of the SDNPA and other PL bodies.

Finally, we feel that the consultation has lost sight of the fact that the SDNP, like all PLs, is a living working landscape, created through thousands of years of interaction between people and place. In focusing on measures needing primary legislation, some of the wider opportunities to align farming, landscape, biodiversity and access could be lost. We therefore hope that this consultation is just the first of a package of measures to strengthen the role, mechanisms and resourcing of PLs so they can fulfil the level of ambition that England expects from them.