

The Rt Hon Lord Benyon
Parliamentary Under Secretary of State
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham St London
SW1P 4D

08 April 2022

Dear Lord Benyon,

Response to Defra Consultation on Landscapes from the South Downs Partnership

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

The South Downs National Park is a living, working landscape created through thousands of years of interaction between people and place. The Partnership has considered the consultation through the lens of the communities who live and work here and also those who come to enjoy its unique landscape and characteristics. Our comments relate to the SDNP but we believe many apply to other protected landscapes.

With our cross-sector focus we were encouraged to see the Landscapes Review identifying opportunities to align farming, landscape, biodiversity and access, and hoped these would be reflected in the Government's response. By contrast, the proposals are primarily concerned with measures requiring primary legislation. We therefore hope that this consultation will be followed by subsequent proposals to strengthen the role, mechanisms and resourcing of protected landscapes so they can fulfil the level of ambition that England expects from them.

With increasing environmental, social and economic external pressures on the National Park, we believe that these additional measures should include stronger bespoke tools, and enhanced funding. The integrated, place-based approach of the SDNPA delivers multiple benefits and represents outstanding value for public money. Without adequate tools, however, there is a real risk of ramping up expectations that cannot be met. We agree that a crucial step is to strengthen the Duty on other bodies (such as Local Highways Authorities, Power Networks and Water Companies) to further National Park Purposes. On biodiversity, previous Government initiatives were not specific to protected landscapes and proved insufficient to halt decline within them, let alone put them in the forefront of nature recovery. As our premier landscapes, protected landscapes need bespoke mechanisms if this 25% of England is to become an exemplar on nature and climate.

The proposals for people and place 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 protected landscapes 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. We are keen to see Defra working with DfE, DLUHC, DCMS and others on changing the narrative: empowering underrepresented communities to value

protected landscapes, and building bridges, to mutual benefit, between those who live and work in them and those who visit.

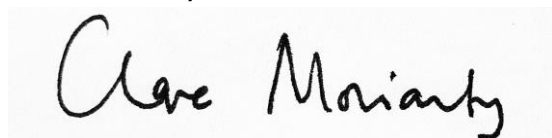
The SDNPA and its partners actively pursue projects in outreach, volunteering, education, health & wellbeing - limited not by level of ambition but the capacity of local organisations to scale up their work and offer more to underrepresented groups. Moving from the deficit model to active, positive, engagement requires investment in physical infrastructure and better places to 'be' - such as cafes, picnic benches, toilets, affordable accommodation, 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 protected landscapes as never before, but schools and families have less time and less money in pocket, so extra resources are essential.

Protected landscapes, like all rural areas, 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. As well as encouraging the SDNPA to be more commercial, we would advocate structural change to give the National Park a higher priority across mainstream public services. For example, decent public transport is vital, yet transport plans currently marginalise many who could benefit from accessing it. Nationally, the budget for Bus Improvement Plans has shrunk from £3bn to £1.4bn, and it seems unlikely that any of this will reach the services which are essential for people without cars here to travel in or out of the National Park for work or leisure.

We agree there are opportunities to secure private inward investment – especially for nature recovery and net zero. But this applies less to other aspects of National Park Purposes and anyway cannot substitute for core funding for NPAs and AONBs 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 its sister bodies.

Finally, we note that those running protected landscapes 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 protected landscapes and hampers them in serving their communities. We would like to see stronger action on diversity for protected landscape Boards and we support the proposals to give their members more training and hold them better to account,

Yours sincerely



Dame Clare Moriarty DCB
Chair of the South Downs Partnership

Partners:

Anita Kerwin-Nye	Kim Wilkie
Chris Todd	Richard Betts
Dr Emma Woodcock	Steve Gilbert
Duncan Ellis	Susi Owusu
Janet Baah	Tom Ormesher
Jenny Williams	Will Atkinson
Kate Barrett	