

Report to **South Downs National Park Authority**
Date **19 October 2023**
By **Director of Countryside Policy & Management**
Title of Report **Key Asks for General Election**
Decision

Recommendation: The Authority is recommended to:

- 1. Approve the five Key Asks set out in this paper and Appendix 1;**
 - 2. Note the Call to Action from the Campaign for National Parks (Appendix 2)**
 - 3. Approve the use of the Key Asks and surrounding narrative as the basis for SDNPA advocacy work ahead of the next General Election.**
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1. Introduction

- 1.1 In anticipation of a General Election campaign in 2024/5, this paper sets out a series of five Key Asks related to the South Downs National Park.
- 1.2 If agreed by the NPA, these asks will provide a point of reference for all interactions by Members, Officers and volunteers with prospective candidates and at hustings in the lead up to the Election, in effect providing the elevator test. They apply equally to any prospective candidate from all political parties.
- 1.3 The asks have been created by taking account of national issues and the work of NPE but tailoring these to the SDNPA context. They are also informed by the work the Campaign for National Parks is doing on a Call to Action.

2. Policy Context

- 2.1 The policy context in which National Parks in general (and the SDNP in particular) is changing rapidly and is very different to that prior to the last election. The Glover Review and its aftermath, the flat cash funding settlement, the establishment of the new Protected Landscapes Partnership and now the Government amendment to the Levelling Up and Regeneration Bill to strengthen the duty set out in section 62 of the Environment Act 1995 from “have regard to” to “seek to further” are all relevant. So too are the wider policy debates about the expectations of PLs in nature recovery (contributing to 30 by 30) and Net Zero, which it is expected will soon be made explicit in the draft guidance on National Park/Areas of Outstanding Natural Beauty Management Plans and the Outcomes Framework.
- 2.2 There is an expectation that English National Park Authorities should take a leading role in improving nature, climate, people and place within their landscapes. This is hugely welcome, but with that high level of ambition comes the need for the tools to do the job well. Resources are tight, we are small organisations and at present we have few direct levers other than use of the planning system.

2.3 The five asks set out below would therefore allow the SDNPA to work much more effectively with local partners and communities to improve this special landscape. They do not create significant extra burdens for the taxpayer, rather they are about doing things better, achieving more synergy between public bodies who work inside National Parks, and more collective impact for public expenditure.

3. Issues for consideration

3.1 The five key asks set out in **Appendix I**, along with reasoning in support of them, are:

3.2 **Make permanent** the SDNPA's role in giving advice and support to farmers and land managers in the National Park to restore nature, cut carbon and welcome people alongside sustainable food production.

3.3 **Enable better sharing** of best practice between the National Park and areas outside by giving all National Parks a general power of competence to be commercially innovative, generate income and work beyond their boundaries and invest in the SDNPA to allow it to give more support to communities, businesses and NGOs in the National Park.

3.4 **Make publicly owned National Nature Reserves** the responsibility of SDNPA with the resources to manage sensitively, improve their quality and where appropriate enable access.

3.5 **Redirect** X% of the Public Health budget in Hampshire and Sussex to bring the health & wellbeing benefits of access to nature to underserved groups and individuals, by building the capacity of community projects in and around the National Park.

3.6 **Ringfence** a proportion of the penalties levied nationally on polluters so they can be reinvested in projects within the National Park which repair damage, restore its ecosystems and make them more resilient.

4. Options & cost implications

4.1 This work sits alongside the advocacy work of a number of other organisations. Locally, the South Downs Partnership meets this month to draw up its own list of asks, and the South Downs Network (an affiliation of conservation, access and heritage groups) is also drawing up its own manifesto. Nationally, the Campaign for National Parks has published its own Call for Action with the following headlines:

- Rapid nature recovery of National Parks
- Give National Parks back to the nation
- A new deal for National Parks

This is attached as Appendix 2

4.2 There are no immediate cost implications of approving the Key Asks other than the officer time to design up the final version and the costs of any hard copy (eg a pledge card). Advocacy on these issues will form part of our ongoing public affairs work.

5. Next steps

5.1 Once the set of key asks is agreed, it will be designed up into a simple, punchy, easy to use checklist which all Members, staff and volunteers can use. The aim is to ensure that the South Downs National Park (and National Parks in general) are front of mind for all prospective candidates in this part of Southern England. This will be best achieved by their use at as many as possible of the hustings for constituencies in and around the SDNP.

6. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No
Does the proposal raise any	See point 4 above

Implication	Yes*/No
Resource implications?	
How does the proposal represent Value for Money?	The Key Asks will allow the SDNPA to be more efficient and effective in its advocacy work pre-election.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	The Key Asks will help to further all aspects of the SDNPA Corporate Plan in particular on Nature Recovery, Climate Action, National Park for All, and Rural Economy.
Links to other projects or partner organisations	See above: Campaign for National Parks, the South Downs Partnership, the South Downs Network.
How does this decision contribute to the Authority's climate change objectives	By strengthening SDNPA's ability to work with landowners and to innovate and share best practice outside the NP boundary.
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?	Yes. In particular, the ask around health & wellbeing would bring direct benefits to many underrepresented groups in and around the NP.
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?	None
Are there any Data Protection implications?	None

7. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
SDNPA seen as campaigning and/or overtly party political	2	3	The Key Asks are non party-political and would apply equally to any prospective candidate

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Appendices

1. Key Asks
2. CNP Call for Action

SDNPA Consultees; Chief Executive; Director of Planning; Chief Finance Officer; Monitoring Officer; Legal Services,

External Consultees None

Background Documents None

Key Asks for the South Downs National Park

In new guidance and policy (*refer to announcements on s62, National Park management plan guidance, Glover etc.*), the Government has set out its expectation that English National Park Authorities should take a leading role in improving nature, climate, people and place within their landscapes. This is hugely welcome, but with that high level of ambition comes the need for the tools to do the job well.

The expectation of NPAs is, correctly, high. But resources are tight, we are small organisations and at present we have few direct levers other than use of the planning system. The five asks set out below would allow the SDNPA and other NPAs to work much more effectively with local partners and communities to improve this special landscape. They do not create significant extra burdens for the taxpayer, rather they are about doing things better, achieving more synergy between public bodies who work inside National Parks, and more collective impact for public expenditure.

Key asks:

1. **Make permanent** the SDNPA's role in giving advice and support to farmers and land managers in the National Park to restore nature, cut carbon and welcome people alongside sustainable food production.
2. **Enable better sharing** of best practice between the National Park and areas outside by giving all National Parks a general power of competence to be commercially innovative, generate income and work beyond their boundaries and invest in the SDNPA to allow it to give more support to communities, businesses and NGOs in the National Park.
3. **Make publicly owned National Nature Reserves** the responsibility of SDNPA with the resources to manage sensitively, improve their quality and where appropriate enable access.
4. **Redirect** X% of the Public Health budget in Hampshire and Sussex to bring the health & wellbeing benefits of access to nature to underserved groups and individuals, by building the capacity of community projects in and around the National Park.
5. **Ringfence** a proportion of the penalties levied nationally on polluters so they can be reinvested in projects within the National Park which repair damage, restore its ecosystems and make them more resilient.

Key Ask	Why all National Parks need this	Why it matters in South Downs
<p><u>1. Make permanent the SDNPA's role in giving advice and support farmers and land managers in the National Park to restore nature, cut carbon and welcome people alongside sustainable food production.</u></p>	<p>All NPAs in England deliver the <i>Farming in Protected Landscapes (FiPL)</i> grants programme on behalf of Defra. This has demonstrated that rapid, targeted and cost effective support can help farmers improve nature, increase access, reduce carbon and improve viability.</p> <p>But if FiPL simply ends in 2025 then the opportunity to give specific, long-term support for nature friendly and regenerative farming in National Parks will be lost. FiPL needs to be made a permanent part of the new farm support regime (ELM) along with the role of NPAs in delivering it.</p>	<p>In the SDNP, FiPL has supported 102 projects with £1.6m of funding for a myriad of projects physical and social. These include conservation grazing, creation of ponds and hedgerows, reducing soil erosion, repair of flint walls, welcoming visitors and schools, shortening and adding value to supply chains, and diversification.</p> <p>Many more farmers in the SDNP are looking to shift their business models to more regenerative and sustainable agriculture but need targeted, consistent, long term support and advice to make the transition.</p>
<p><u>2. Enable better sharing of best practice between the National Park and areas outside by giving all National Parks a general power of competence to be commercially innovative, generate income and work beyond their boundaries and invest in the SDNPA to allow it to give more support to communities, businesses and NGOs in the National Park.</u></p>	<p>National Park Authorities (NPAs) are effective in two ways,</p> <ul style="list-style-type: none"> - When they have funds and staffing to carry out projects themselves and deliver quality services e.g. Planning - when they can bring partners together to focus collective action and inward investment on the National Park. <p>The former requires a predictable level of core funding to</p> <ul style="list-style-type: none"> • add value through the statutory planning function of NPAs so that developments are of the highest 	<p>In the SDNPA, the statutory planning function is a key mechanism for delivering on National Park purposes . Our award winning Local Plan was one of the first in the country to embed ecosystem services and embed nature recovery when developments are approved.</p> <p>The SDNPA, and the South Downs Trust it created have been very successful at bringing in new funding <i>for specific projects and external partners</i>. But the limiting factor now is the SDNPA capacity to bring partners together to create these projects in the first place and the very specific terms of some funds and grants.</p>

	<p>standard within these protected landscapes,</p> <ul style="list-style-type: none"> • provide match funding for project bids to leverage external investment (lottery, trusts, corporate etc) into the National Park. <p>The latter requires sufficient flexible funding and the availability of expert staff to facilitate partnerships between public bodies, the third sector and business private partners, create shared project proposals and provide collective measures of impact.</p> <p>Years of flat cash settlements have eroded the SDNPA capacity to carry out statutory functions to a level expected in a National Park and act as a catalyst and convenor.</p> <p>Unlike other Local Authorities in England, NPAs do not have a General Power of Competence. This means (unlike say Counties or Districts/Boroughs):</p> <ul style="list-style-type: none"> • they cannot generate commercial income unless from activities directly related to their purposes; • they cannot generally work outside their boundaries to share best practice through providing consultancy services based on the expertise and experience gained inside the NP. <p>Giving NPAs a General Power of Competence is straightforward and would unlock their potential to be more</p>	<p>This is where the core funding from Defra to the SDNPA plays a unique role.</p> <p>Some examples :</p> <ul style="list-style-type: none"> • Changing Chalk: SDNPA helped National Trust to conceive and create the project and thereby secure HLF funding; • Heathlands Reunited. SDNPA convened partners, made the successful bid the the HLF and led the delivery partnership • Ouse Valley Climate Action. The SD Trust invested in the development of the proposition, made a successful bid the Climate Action Fund and with the SDNPA is leading the delivery partnership. <p>The SDNPA already has a number of programmes of work which could benefit other outside the NP and have the potential to generate more income by franchising out the model or providing consultancy services. Three examples:</p> <ul style="list-style-type: none"> • Neighbourhood Development Plans • Whole Estate Plans. The SDNPA has developed this model working with private and public estates in the National park and there has already been interest in the SE and other parts of England in replicating the model. <p>Nature Based Solutions (green finance). The SDNPA has taken a pioneering role inside the NP by establishing an NBS</p>
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	<p>innovative, generate new sources of income and spread the good practice from inside NPs to areas outside them. A win-win scenario at no cost to the taxpayer.</p>	<p>service. This is based around nutrient, NBS and now carbon markets with the SDNPA taking a brokering role in linking landowners inside the NP with Las and developers outside it.</p>
<p>3. Make publicly owned National Nature Reserves within the National Park the responsibility of SDNPA with the resources to manage sensitively, improve their quality and where appropriate enable access.</p>	<p>In English National Parks, the designated sites which are publicly owned should be managed to the highest possible standard as befits a nationally protected landscape.</p> <p>Delivery of Purpose 1 is contingent upon these sites being in top condition, they will form the backbone of any Local Nature Recovery Strategy and should be welcoming, accessible and well interpreted.</p> <p>But at present their condition varies a great deal, and there is little evidence they are consistently in better condition, or given a higher priority inside NPs, when compared to designated sites outside them.</p> <p>NPAs currently have no direct mechanisms to intervene on these sites unless they already own them, and to require a higher standard of management.</p>	<p>The ownership and standard of management of National Nature Reserves varies considerably despite their location in a National Park.</p> <p>To ensure that they fulfil their potential to contribute to National Park purposes, the SDNPA should be given the powers and resources to manage these sites directly.</p>
<p>4. Redirect X% of the Public Health budget in Hampshire and Sussex to bring the health & wellbeing benefits of access to nature to underserved groups and individuals, by building the capacity of community projects in and around the National Park.</p>	<p>England’s National Parks provide a natural health service and we know that experiencing them has a powerful positive impact on mental and physical health & wellbeing.</p> <p>This is particularly the case when someone who has not been able to have this experience is given the opportunities.</p>	<p>In the SDNP, we have developed an active role as a broker with a range of local partners – such as <i>GROW, MIND and Artscape</i>. This work links organisations who work with those suffering from poor health to places and activities inside the National Park</p> <p>These and other groups have demonstrated how they can improve the</p>

	<p>NPAs are working hard to broaden the benefits of being in their landscapes by acting as a broker between health professionals and community-based organisations which provide tailored experiences ranging from guided walks to practical volunteering to arts and heritage based activities..</p> <p>But the limiting factor is often the capacity of these local bodies in and around NPs to grow, accept more referrals and meet the latent demand for them.</p>	<p>mental and physical health of participants – especially those who are vulnerable, underrepresented or have felt excluded. The effect is often transformational for the individuals involved but is very resource intensive.</p> <p>Many GPs here already want to offer “social prescribing” to activities in and next to the SDNP.</p> <p>But without extra help from the health sector to build their capacity these local partners cannot scale up their work and take on more clients</p>
<p>5. <u>Ringfence</u> a proportion of the penalties levied nationally on polluters (eg Water Companies) so they can be reinvested in projects within the National Park which repair damage, restore its ecosystems and make them more resilient.</p>	<p>The polluter pays principle suggests that when fines are imposed on bodies for damage to the environment those fines should be reinvested to repair the damage caused.</p> <p>For example, the most high profile cases have been with water companies, and the Government has now established a national Water Restoration Fund into which the (unlimited) fines will now go. Despite their designation, many National Parks and AONBs (for example the South Downs, Kent Downs, Lake District, Broads, Yorkshire Dales and Wye Valley) continue to suffer unacceptable levels of damage through sewage spills.</p> <p>Ringfencing a proportionate amount of the national fund and giving it to NPAs (and AONB units) to distribute into catchments would help to address this</p>	<p>The SDNP is covered by three water companies (Southern Water, SE Water and Portsmouth Water). These companies also cover parts of a neighbouring National Park (the New Forest) and a number of AONBs.</p> <p>The principal rivers passing through the SDNP are the Itchen, Meon, Rother/Arun, Adur, Ouse and Cuckmere. None are in good ecological condition despite being in a National Park,.</p> <p>There have been repeated and continued instances of sewage dumping into these rivers by water companies and little evidence of inspection or prosecution by the Environment Agency. Apart from the direct damage and public outcry, this practice undermines the delivery of NP outcomes on nature recovery (wetlands and species), climate action (sequestering</p>

	<p>problem and would be seen as positive by the public.</p> <p>The same principle could useful be applied to other fines for environment damage caused in National Parks</p>	<p>carbon) and people (experience of using rivers).</p> <p>A topslice of the water restoration fund would allow the SDNPA to invest in catchment based solutions via Rivers Trust and other stakeholder in each river basin.</p>
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Campaign for National Parks

Wilder National Parks for all: Our manifesto

Our Manifesto call for the next General Election

From the peaks of the Lake District and the ancient oaks of the New Forest, to the wild moorlands of Dartmoor and the waterways of the Broads, National Parks have so much to offer.

Providing escape, wellbeing and community, millions of people across the country care passionately about these landscapes **and want to see urgent action taken** to make them more nature-rich, inclusive and enjoyed by all.

That's why we're calling on the Westminster parties to seize the initiative at the next General Election and commit to an ambitious programme to transform our National Parks.

And you can help add your voice.

Rapid nature recovery of National Parks

- New legislation with: nature recovery purpose; stronger duties on public bodies; more effective management plans and accountability, and; controls on damaging activities, such as water pollution, major roadbuilding and peatland burning.
- Nature acceleration programme: further, faster in National Parks getting all SSSIs to favourable condition, water bodies at good status, peatlands restored and all public land managed for nature.
- Doubling the budget for nature-friendly farming and wilder land management, with a pay-rise for farmers and specific targeting for National Parks.

Give National Parks back to the nation

- Every child to have a night under the stars as part of National Curriculum.
- Expansion of freedom to roam, supported by a 1000-strong ranger service, with trials to expand backpack camping.

- Legal reform to ensure equality in access and participation, including change in purposes to promote inclusion, health and wellbeing; reforms to National Park Authority Boards including a role for citizen assemblies; and new powers on transport and second homes.

A new deal for National Parks

- Greater Government investment in all National Parks, with a Nature Recovery Obligation to grow and target private sector investment.
- A National Nature Service creating green jobs, opportunities for training, volunteering and social prescribing with National Parks at the heart.
- Reforms to accelerate the designation of new National Parks as exemplars for nature recovery, climate action and public access, and supporting the creation of National Marine Parks.

Our offer to the parties ahead of the General Election

Campaign for National Parks invites the Westminster political parties to place National Parks at the heart of their election manifesto and their vision for the country.

From jobs to the environment, education to health and wellbeing – National Parks can offer so much.

Over the coming months we'll be giving opportunities for party leaders, ministers, MPs and candidates to back our election asks and show the public just how committed they are to making our National Parks thriving, nature-rich places for everyone.