

Key Asks for the South Downs National Park

In new guidance and policy (*refer to announcements on s62, National Park management plan guidance, Glover*), 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.

Revised key asks (see overleaf):

Key Ask	Why all National Parks need this	Why it matters in South Downs
<ul style="list-style-type: none"> Cement 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 more sustainable food production. 	<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>
<ul style="list-style-type: none"> Grant National Parks a general power of competence to be commercially innovative, generate income and work beyond their boundaries. 	<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 standard within these protected landscapes, provide match funding for project bids to leverage external investment (lottery, trusts, corporate 	<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>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

	<p>etc) into the National Park.</p> <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 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>project and thereby secure HLF funding;</p> <ul style="list-style-type: none"> • 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 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>
<ul style="list-style-type: none"> • Transfer responsibility and resources for publicly owned National Nature reserves within the National Park to the SDNPA to maximise 	<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>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</p>

<p>nature recovery and access opportunities.</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>Park purposes, the SDNPA should be given the powers and resources to manage these sites directly.</p>
<ul style="list-style-type: none"> • Increase the role of nature in delivering health and wellbeing to underserved groups by piloting the investment of a proportion of the Public Health Budget in Hampshire and Sussex to increase the capacity of community projects in and around the National Park. 	<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>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>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 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>
<ul style="list-style-type: none"> • Make the polluter pay by ringfencing a proportion of the penalties levied on polluters in and around the National Park (eg 	<p>The polluter pays principle suggests that when fines are imposed on bodies for damage to the environment those fines</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</p>

<p>water companies) to be reinvested in projects that restore and strengthen its ecosystems.</p>	<p>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 problem and would be seen as positive by the public.</p> <p>The same principle could be applied to other fines for environment damage caused in National Parks</p>	<p>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 overflows 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 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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