

Agenda Item 10 Report NPA23/24-25

Report toNational Park AuthorityDate28 March 2024ByCountryside & Policy Manager (Eastern Downs)Title of ReportThe Chalk Coast National Nature Reserve: proposal to extend
Lullington Heath National Nature Reserve to include land at
Seven Sisters Country Park

Decision

Recommendation: The Authority is recommended to:

- 1. Note and welcome the emergence of the Chalk Coast National Nature Reserve proposal of Natural England which involves the extension of Lullington Heath National Nature Reserve;
- 2. Delegate Authority to the Chief Executive, in consultation with the Chair of the Authority, subject to professional advice obtained, to issue a letter of intent seeking to become an Approved Body under section 35 of the Wildlife and Countryside Act 1981 for the land at Seven Sisters Country Park currently designated as a Site of Special Scientific Interest also to be designated as a National Nature Reserve becoming part of the emerging Chalk Coast National Nature Reserve;
- 3. Note that Natural England will provide an update on the process in summer 2024 and may seek further decisions from the National Park Authority at that stage; and,
- 4. Delegate Authority to the Chief Executive, in consultation with the Chair of the Authority, to make any further decisions required by Natural England pursuant to recommendation 2, provided that there is no material change in circumstances as set out in this report.

I. Introduction

- 1.1 This report has been produced to outline the emergence of the Chalk Coast National Nature Reserve proposal of Natural England which would become the first "ground water inspired" super National Nature Reserve (sNNR). Connecting drinking water, chalk geology and habitats and regenerative farming to provide vital services for people living, working, and visiting this part of the South Downs.
- 1.2 It seeks the NPA's agreement that the SDNPA apply to Natural England to become an approved body and to seek a declaration from Natural England that the land at Seven Sisters Country Park (SSCP) owned by the South Downs National Park Authority (SDNPA) can voluntarily be included in the extension of Lullington Heath National Nature Reserve (NNR).
- 1.3 The focus of SDNPA land to be included in the extended NNR is the land designated as a Site of Special Scientific Interest (SSSI) within SSCP (as shown in Figure 2).
- 1.4 The extended NNR has a working title of The Chalk Coast NNR.

- 1.5 The project is being facilitated by Natural England (NE), as part of the England-wide King's Series of partnership NNRs and is a key element of delivering the Government's commitments to both reverse the decline in biodiversity and deliver climate resilience.
- 1.6 The NNR partnership is about collaborative working and should be viewed as a catalyst for action for nature recovery and climate resilience in a shared landscape, not just a badge or name.
- 1.7 The Policy and Resources Committee considered this matter at their meeting on 29 February 2024 and recommended that the NPA agree that the SDNPA seek to become an Approved Body and work towards the land at SSCP being declared a NNR.

2. Policy Context

- 2.1 The National Parks and Access to the Countryside Act 1949 sets out the purpose of NNRs.
- 2.2 Section 35 (1) Wildlife and Countryside Act 1981 states that a NNR will be land which is of national importance, and which is:
 - a) managed as a nature reserve through a Nature Reserve Agreement (NRA) between the landowner and Natural England;
 - b) held and managed as a nature reserve by Natural England (ie where we have the freehold or leasehold); or,
 - c) held by an 'Approved Body' (any other organisation approved by Natural England) and managed as a nature reserve.
- 2.3 The **Natural Environment & Rural Communities Act 2006** extended the role of NNRs to include the provision of opportunities for public enjoyment of nature and/or openair recreation, where these purposes don't conflict with the nature conservation purpose.
- 2.4 Sections 6 and 7 of the Countryside Act 1968 set out the purposes of a Country Park and an authority's powers in relation to them. The purposes of a Country Park are set out in section 6 as "... providing, or improving, opportunities for the enjoyment of the countryside by the public ..." and in exercising powers in relation to a Country Park the Authority is to have regard to the location of that area in the countryside in relation to an urban or built-up area, and to the availability and adequacy of existing facilities for the enjoyment of the countryside by the public.
- 2.5 The proposal fits under both National Park Purposes;

Purpose I: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area, and

Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Outcomes I-3 of the Partnership Management Plan 2020-25; and contributes towards the Nature Recovery High Level Targets in the Corporate Plan 2023/24 and 2024/25.

- 2.6 The Chalk Coast NNR would potentially include land owned and/or managed by eight organisations. Covering over 2000 hectares (ha) it will help protect the underlying geology and support natural processes to protect groundwater, as well as allowing for ecological functioning at scale for nature's recovery. The NNR forms the core part of a wider Nature Recovery Project, and both will contribute to the Government's Environmental Improvement Plan 2023 (EIP) targets. NNRs are also part of the Government's wider plans for nature recovery as a core part of the Nature Recovery Network and 30by30, forming part of the Protected Sites category of 'Areas that Currently Count', set out in the 9 December 2023 paper Delivering 30by30 on land in England GOV.UK (www.gov.uk)
- 2.7 There is an opportunity for the core landowners and managers to take advantage of the land managed primarily for nature conservation between Seaford and Eastbourne, to voluntarily declare a National Nature Reserve, approved by the Natural England Board. The NNR would form the beating heart of the larger Seaford to Eastbourne Nature Recovery Project,

restoring nature at scale to address water quality, biodiversity loss, climate change, and public health and wellbeing, and underpinning local economies. The new Chalk Coast NNR would deliver a joined-up approach to facilitate working relationships across the landscape, resulting in effective and efficient management, which delivers ecosystem services, thriving nature whilst providing savings, in both cost and resource, to the organisations involved. There is a particular emphasis on climate resilience and protecting the quality and quantity of groundwater, which provides drinking water to Seaford and Eastbourne, from two underground aquifers.

- 2.8 The date proposed for the Natural England Board to formally consider the voluntary declaration of the Nature Reserve is November 2024. Regular meetings are now underway where partners are shaping the NNR, as well as connecting with and involving wider stakeholders.
- 2.9 The Natural England guidance for NNRs is set out in:
 - The Strategy for England's National Nature Reserves (Appendix I)
 - The Selection Principles for National Nature Reserves in England (Appendix 2)
 - Natural England Standard National Nature Reserves Management Standards (Appendix 3)

3. Issues for consideration

Background

- 3.1 Lullington Heath is a National Nature Reserve (NNR) situated above Friston Forest in East Sussex. At only 63ha it is an ecological island of rare chalk heath and grassland in a landscape surrounded by farmland, as well as multiple Sites of Special Scientific Interest (SSSIs), the majority of which are in unfavourable condition.
- 3.2 The focus for the proposed 2000 ha+ Chalk Coast NNR is framed by the Selection Principles for NNRs: Nature, Science and People (Appendix 2)

<u>Nature</u>

3.3 Bigger, better, more and joined habitats: To maximise the value of these chalk habitats, they will benefit from improved landscape scale connectivity and appropriate grazing to control the level of scrub and preventing coarse grasses from growing. It is currently proving difficult for managers of the smaller areas within this landscape to operate their own herds, especially when they are not based on site. The NNR could offer access to a potential coordinated 'super herd' in the area notwithstanding the challenges associated with achieving appropriate grazing density and presence of bovine TB locally. This could provide the means to deliver an essential, tailored grazing plan that will optimise the habitat for nationally rare species as well as enhancing the beauty of the landscape by increasing wildflower species. This, in turn, will provide a vital food source for pollinators, as well as restoring nature to enhance the enjoyment and wellbeing of local visitors and tourists to the area. Working together will also strengthen Partners' delivery of England's legal commitment to species abundance and halting extinctions. Joint working through the Chalk Coast NNR will develop ecologically functioning species conservation strategies to put life back into the landscape. Species research has already identified a short-list for targeting, highlighting for example, passage birds and chalk orchids, as well as locally exclusive critically endangered species like the grayling butterfly and wart-biter cricket.

<u>Science</u>

3.4 Climate resilient groundwater: The drinking water supply for Seaford, Eastbourne, and the surrounding villages, comes from two chalk aquifers within the area. <u>Recent research</u> by South East Water has shown the quality of the water from the aquifers is deteriorating and without changes in land use above will require costly chemical intervention. The overall volume of water available for abstraction is also under increasing pressure from supply climate change. Managing the land above these underground aquifers to enhance good quality and resilient chalk habitats will enable the natural filtering of unwanted pollutants, such as fertilisers, pesticides, and animal waste. Good management will also increase deep

soil moisture to improve water supply and enhance aquifer recharge. This provides clean and plentiful drinking water for residents; especially pertinent as weather extremes become more frequent.

<u>People</u>

- 3.5 Seven Sisters Country Park is managed as a visitor attraction, encouraging enjoyment and engagement with nature and the landscape. As a gateway to the South Downs National Park, opportunities are embraced to engage a wide range of audiences with an accessible landscape whilst promoting access, education, conservation and engagement activities with nature. Opportunities are also provided for renature volunteering where people can practically engage with the management and restoration of the chalk grassland and wildlife habitats.
- 3.6 Since SDNPA took ownership in 2021, significant investment has been made in the visitor centre and other facilities. Raising awareness and telling the story around the landscape, nature and climate change is already underway giving SSCP a central role in engaging the local community and visitors with the National Nature Reserve. Located within the Sussex Heritage Coast, SSCP is one of three current visitor hubs (others being Birling Gap and Beachy Head Story) which can provide this wider narrative. Such an approach has already been developed for the Sussex Heritage Coast with key messages and shared wording. The areas of land proposed to be within the "super NNR" are also connected by the South Downs Way and England Coastal Path as well as having significant open access. There is a great deal of further potential to "connect people with nature" across all of it.



The proposed extension

Figure 1: Map of potential partner land

- 3.7 To realise the goals above, a landscape-based approach needs to be taken and this means looking beyond the land already managed as an NNR.
- 3.8 Natural England has approached all of the core partners to gauge their interest in voluntarily declaring their land to be part of the NNR. The extension to the NNR is proposed for the land owned or managed by:
 - South Downs National Park Authority and Seven Sisters Country Park
 - South East Water (including Natural England as existing NNR manager)
 - Forestry England
 - Eastbourne Borough Council

- National Trust
- Seaford Town Council
- Sussex Wildlife Trust
- 3.9 The National Trust, Forestry England, Sussex Wildlife Trust and Natural England are all already Approved Bodies, whilst Eastbourne Borough Council, Seaford Town Council and South East Water would also need to become Approved Bodies along with the SDNPA.

Seven Sisters Country Park

3.10 The SSSI land owned and managed by SDNPA at SSCP (Figure 2), which forms the majority of the Country Park, is proposed to be included in the NNR as it meets the Selection Principles for NNRs of already being managed primarily for nature conservation (Appendix 2).



Figure 2: Detail of Seven Sisters Country Park (proposed land for inclusion within the sNNR is contiguous with the SSSI)

- 3.11 It is noted that at other sites around the country, such as Durslton Country Park in Dorset and Pegwell Bay Country Park in Kent, that the designations of Country Park and NNR appear to work successfully alongside each other. Further consideration is being given to this issue.
- 3.12 The proposal is also consistent with the purposes of a Country Park under section 6 of the Countryside Act 1968 due to the site's proximity to the urban and built-up areas of Brighton, Peacehaven, Newhaven, Seaford, and Eastbourne and the desirability of providing opportunities for the public to enjoy the countryside at a NNR.

Affiliated Land

3.13 There is also the potential to affiliate land, outside of the NNR boundary, which does not have nature conservation as its first priority but is being managed with nature conservation as a consideration. An example would be farmland which has food production as its primary objective but is managed to be nature friendly. Such land could benefit from the over-arching join-up of management mentioned above and so contribute positively to a more connected landscape for wildlife. This is not likely to apply on any of the other land owned by the SDNPA at SSCP.

4. Benefits

- 4.1 The initial inspiration for this project came from the need to protect the chalk aquifers. SDNPA already recognises the importance of the aquifer for local communities (both within the National Park and surrounding coastal conurbations) as well as its importance for ecological functioning. This is put in to practice through existing initiatives such as The Aquifer Partnership focused on the Brighton chalk block.
- 4.2 **Connecting the landscape** will help nature to thrive and the SSCP has a key role to play in linking parts of the Seaford to Beachy Head SSSI. The national status and recognised brand of the NNR series, along with strengthening working relationships with other landowners across the local landscape, will build resilience and create confidence that partners can do more together.
- 4.3 **Operating at scale** will provide a better and more cost-effective way of managing this land. Experience from other recently declared Kings Series partnership NNRs has proven that there are also novel funding opportunities. For example, other potential partners in the area are currently considering ways this would enable improvements in biodiversity, access, grazing and interpretation, as well as connecting the site to the wider landscape.
- 4.4 The NNR would have an **over-arching management framework**, that would sit over each organisation's management plan but would not overrule it. The management framework will be developed after the declaration and be co-designed to provide benefits for each partner and enable closer working together. As the partnership NNR declaration is voluntary any agreements made within this document are voluntarily undertaken by the partners. The partnership working together will achieve the agreed outcomes across the NNR. Existing stewardship schemes would fit in the management framework, highlighting outcomes that the schemes enable, rather than dictating what should happen in the scheme.
- 4.5 This would help to deliver national Environmental Improvement Plan (EIP) targets by improving the condition of the SSSIs (as part of the NNR), improving the health of the chalk aquifer and creating nature-rich land in the wider area. It will help to ensure that the land is land managed for nature conservation, with wider environmental benefits, in perpetuity by collective agreement. Two funded projects, identified by the eight Chalk Coast core partners, that this project has already enabled, are research projects focused on scrub and soil within the circa 2000 ha NNR landscape.
- 4.6 **Climate resilience** is built into the SSCP Management Plan and many of the SDNPA Plans, such as the Partnership Management Plan, the Local Plan and the Corporate Plan. The area under consideration a super NNR has a long history of discussions and partnerships who have tackled these issues. Working with climate resilience in mind will help enable the necessary changes to the landscape and a partnership will allow support for these conversations with wide-ranging stakeholders. Broad environmental benefits include a

healthy and resilient aquifer which in turn helps support good biodiversity and natural processes.

4.7 Other benefits include increased access to **funding sources** from both the public and private sector. For example, South East Water has provided support to the existing NNR for many years, and has recently secured the largest Water Industry National Environment Programme (WINEP) investment in England, incorporating the NNR within its scope. There is also potential for greater support for agri-environment schemes to support landscape-scale ecological function. Resourcing in the form of a Partnership Officer, to be hosted by one of the partners and funded jointly, is a shared ambition. In addition to Environmental Land Management Schemes (ELM), including Landscape Recovery, other funding opportunities include the Nature Recovery Project Conservation and Enhancement Scheme (which is targeted at activities other than those covered by ELMs, such as management agreements), and the core Nature Recovery Project asset fund (already being used for the scrub and soils research mentioned above). Nature Recovery projects are also a focus for the Government's £500m per annum private finance target, for example the current Corporate Philanthropy Pilot.

5. Options & cost implications

- 5.1 The Lullington Heath NNR extension is a voluntary declaration and would not add any further compulsory land management requirements for the SDNPA in addition to those for the existing SSSI. Compliance with the overarching management framework would be voluntary and would take account of any existing commitments, such as in Countryside Stewardship agreements, with the aim of ensuring that all landowners were able to contribute positively towards the Chalk Coast NNR. Other commitments such as contribution to or hosting of a partnership officer, contribution to projects, community engagement or other financial commitments would again be voluntary and for discussion and agreement by the partners. The NNR standards set out that local communities and stakeholders should be given the opportunity to contribute to how the objectives of the management plan are achieved and to the direct management of the NNR
- 5.2 Land in the Chalk Coast NNR is required to be managed by an Approved Body (AB), demonstrating the intent to deliver exemplary management, as set out in the NNR Management Standards (Appendix 3), in perpetuity. SDNPA would therefore need to become an Approved Body with respect to the SDNPA SSSI land at SSCP. Other partners may also have to go through the application process to also become Approved Bodies in relation to their land holdings.
- 5.3 If agreed, the SDNPA would be the first National Park Authority to become an Approved Body with a sNNR. Although there is a precedent as the Lake District National Park Authority is a partner in the Wild Ennerdale sNNR albeit the actual management falls to a partnership of Forestry England, United Utilities, National Trust and Natural England. The first landscape scale or super NNR was declared at the Purbeck Heaths, Dorset, whilst the most recent declaration was made at the Mendip Hills. (Appendix 7). NPAs with "regular NNRs" include:
 - Exmoor NP Hawkcombe Woods NNR; Tarr Steps Woodland NNR
 - Lake District NP Bassenthwaite Lake NNR, Rusland Moss NNR; Whitbarrow NNR
 - The Broads How Hill NNR
 - Northumberland NP Greenlee Lough NNR
- 5.4 Natural England will be engaging with local people and other stakeholders as part of the journey to declaring the Chalk Coast NNR. The intention is to confirm the core NNR partners first, then move on to Affiliated Partner landowners in the area and the local community.
- 5.5 Natural England is currently looking at how best to collaborate with people who live and work locally and have a stake in the landscape including the farm clusters and Parish Councils.

- 5.6 As mentioned, the Chalk Coast NNR forms the heart of the wider Nature Recovery Project (NRP), which covers around 12,000 ha. This provides opportunities for working with a wider range of stakeholders who cannot be part of the NNR.
- 5.7 The NRP will also inform and be part of the county-wide Local Nature Recovery Strategy.
- 5.8 If the Chalk Coast NNR declaration takes place, governance arrangements for the NNR partners will need to be agreed collaboratively. These will include how to produce the management framework and agreeing monitoring and reporting requirements, both of which are required by the NNR Management Standards.
- 5.9 SDNPA Officer time will be required pre-declaration to build the case for NNR selection and Approved Body status. Post declaration, time will be needed to contribute to the NNR partnership, help establish governance and ensure that the land at SSCP continues to be managed in accordance with the NNR Management Standards (Appendix 3).
- 5.10 Post declaration the designation of the site as an NNR would be incorporated into existing signage and interpretation.

6. Next steps

- 6.1 Subject to Member approval at the NPA, the next step to become an Approved Body for the NNR is for the SDNPA to provide a Letter of Intent (examples in Appendix 7). Professional is currently being obtained in relation some outstanding issues in relation to the Authority's obligations in this matter. It is therefore recommended that delegated authority be granted to the Chief Executive, in consultation with the Chair, subject to professional advice obtained, to issue a letter of intent seeking to become an Approved Body under section 35 of the Wildlife and Countryside Act 1981 for the land at Seven Sisters Country Park currently designated as a Site of Special Scientific Interest also to be designated as a National Nature Reserve becoming part of the emerging Chalk Coast National Nature Reserve.
- 6.2 SDNPA officers will continue to work with Natural England and the other NNR partners to progress towards NNR Declaration in November 2024. Natural England officers will make the case for SDNPA to become an Approved Body through a standard form (Appendix 5).
- 6.3 Natural England's intention is to come back to SDNPA and the other NNR partners in summer 2024 with an update on the process and for any further decisions to be taken. At this time the SDNPA will need to confirm commitment of the land to the NNR and its role as an Approved Body alongside the other partners. The proposal would then be submitted to the NE Board confirming inclusion of SDNPA's land, its status as an Approved Body, and the 2000+ hectare Chalk Coast NNR boundary.
- 6.4 The development of the overarching Management Framework will follow the Declaration and be a collaborative process involving all the confirmed NNR partners. Natural England will provide officer time to coordinate production.
- 6.5 Establishment of the future governance arrangements for the NNR partners will also follow Declaration. (Appendix 6).
- 6.6 As part of the review of the operating agreement with South Downs Commercial Operations on the management of SSCP any implications arising from the designation as a NNR would be considered.

7. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	No

Implication	Yes*/No
Does the proposal raise any Resource implications?	The resource implications of the sNNR declaration are mainly around staff time / capacity. NNR status in its own right will not cost more but has the potential to attract external funding.
	There will be a requirement to ensure the land at SSCP continues to be managed in accordance with the NNR Management Standards and the management framework.
How does the proposal represent Value for Money?	By working in partnership at a landscape scale the Authority looks to make effective use of its resources in a bigger, better, more joined up approach to nature. The Value for Money of any projects or other commitments as part of the extended NNR would be assessed at such time as the Authority may consider undertaking them.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	Partnership Management Plan 2020-25 Outcomes I-3 Contributes towards the Nature Recovery High Level Targets in the Corporate Plan 2023/24 and 2024/25
Links to other projects or partner organisations	This project is working in partnership with Natural England plus:
	South East Water
	Forestry England
	Eastbourne Borough Council
	National Trust
	Seaford Town Council and Sussex Wildlife Trust
	There is the additional scope to work with potential affiliated landowners/managers.
	The sNNR is located within the Sussex Heritage Coast which has an existing collaborative approach, as well as part of the future Nature Recovery Project. It could also support the legacy from Changing Chalk Project and the implementation of the Eastbourne Downland Whole Estate Plan.
How does this decision contribute to the Authority's climate change objectives	The proposal will support climate resilience at a landscape scale.
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?	There are no equalities implications arising from this report. Equalities issues are taken into account in relation to any decision taking with regard to the application and administration of any grant funding submission and in the implementation of the wider nature recovery programme and operation of Seven Sisters Country Park.
Are there any Human Rights implications arising from the proposal?	None

Implication	Yes*/No
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

8. Risks Associated with the Proposed Decision

- 8.1 The declaration of the sNNR is voluntary. As a result, there are no guaranteed additional resources or funding.
- 8.2 There is a risk that the development of the overarching Management Framework may not completely align with individual partner site management, however, the development of the Management Framework in collaboration with all landowners within the NNR seeks to minimise this risk. Also, the proposed area of land is currently all designated as a SSSI and therefore required to be managed in accordance with the legally designated features of interest and this will not change.
- 8.3 There is a risk that the NNR declaration could hinder some commercial activity at SSCP, however, as with site management this is already subject to the existing SSSI designation and associated consenting requirements. NE consider it "highly unlikely that the 'primary purpose of nature conservation' on the NNR would add further restrictions to that of the SSSI status." Indeed, there is potential for commercial activities to support delivery of the three NNR pillars of nature, science and people. There is also land elsewhere in England which operates as both a Country Park involving some level of commercial activity and NNR, demonstrating that the two designations for different purposes can work successfully together.
- 8.4 Should SDNPA not progress with the NNR declaration there is a risk of losing out on a landscape scale approach to nature recovery, ecosystem services and associated benefits. Something which we advocate as a protected landscape and as part of the ReNature Campaign and Nature Recovery programme.
- 8.5 There is also a potential risk in relation to communications and marketing. Appendix 5 makes it clear that NE expect the title of NNR to be used. In terms of marketing there could be "brand" confusion. However, within the National Park we already work with multiple brands such as the Sussex Heritage Coast and the National Trail. The NNR "brand" should also act to attract funding and place a higher priority on the area for nature recovery.
- 8.6 The SDNPA currently has the power to make byelaws for the Country Park. Once designated as a NNR, NE would also have the power to make byelaws for the area of the Country Park designated a NNR. The risk of conflict between the two bodies on this matter is considered to be minimal and NE has confirmed it would only look to make byelaws on the site in partnership with the SDNPA. There are no existing NNR byelaws in place across England.

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Appendices	I. The Strategy for England's National Nature Reserves
	2. The Selection Principles for National Nature Reserves in England
	 Natural England Standard National Nature Reserves Management Standards
	4. Approved Body Status
	5. Approved Body form template
	6. Partnership NNR Governance
	7. Examples from Mendip Hills Super NNR
	8. Frequently Asked Questions (FAQs)
	9. Designations Table
SDNPA Consultees	Chief Executive (Interim); Director of Landscape and Strategy; Head of Governance; Commercial and Strategic Manager; Monitoring Officer
External Consultees	Natural England
Background Documents	Partnership Management Plan
	Corporate Plan 2020–2025
	Environmental Improvement Plan
	National Parks and Access to the Countryside Act 1949
	Wildlife and Countryside Act 1981
	Natural Environment and Rural Communities Act 2006
	SSSI detail
	Delivering 30by30 on land in England
	The Aquifer Partnership (TAP)
	Nature recovery projects to boost wildlife and access to nature (including the Seaford to Eastbourne Nature Recovery Project)
	COP28 Video
	National Nature Reserve

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