



Report to **South Downs National Park Policy & Resources Committee**
Date **19 September 2024**
By **Performance and Projects Manager**
Title of Report **South Downs Partnership Management Plan - Review**
Decision

Recommendation:

Committee is recommended to:

- 1. Approve the proposed approach to the review of the Partnership Management Plan for the South Downs.**

The Committee is recommended to recommend to the NPA:

- 2. That the SDNPA produces a revised draft Partnership Management Plan, rather than a scoping report and a copy of the existing plan, to be approved at a future meeting of the NPA;**
 - 3. To agree the terms of reference of the PMP Steering Group;**
 - 4. That authority be delegated to the Chief Executive, in consultation with the Chair of the Authority, to select and appoint the chair and members of the Steering Group and to determine the basis of those appointments including the terms and conditions and the payment of any allowance; and,**
 - 5. that the SDNPA issues a notification of intent to review as required by Section 66 of the Environment Act 1995, at the appropriate point in the process with a copy of the revised draft Partnership Management Plan.**
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1. Introduction

- 1.1** The purpose of this report is to inform Members about the process for the review of the South Downs National Park Partnership Management Plan (SDNP PMP) and to agree recommendations to the National Park Authority meeting in October 2024. It sets out the legislative requirements and responsibilities of the National Park Authority and other Partners, our approach, and the assessments needed to complete the process.
- 1.2** The Authority's approach to the review of the PMP for 2025-2030 is informed by an extensive evaluation of the 2020-2025 plan, including lessons learned. In addition, in April 2024 Natural England produced draft guidance for Protected Landscapes in England. It sets out in some detail how management plan reviews should be conducted.

2. Policy Context

- 2.1** The National Parks and Access to the Countryside Act 1949 ('the 1949 Act') enabled the creation of National Parks and Areas of Outstanding Natural Beauty (now known as National Landscapes), ensuring the protection of the Country's most beautiful and unique landscapes. This Act and subsequent legislation have firmly established the purposes of Protected Landscapes.

- 2.2 National Park Authorities are the responsible Authority for their area. The statutory purposes and duty for National Parks are set out in the 1949 Act. The purposes are (1) to conserve and enhance the natural beauty, wildlife, and cultural heritage of their areas and (2) to promote opportunities for the understanding and enjoyment of the special qualities of those areas by the public. The duty is to seek to foster the economic and social well-being of local communities in the National Park in pursuit of the purposes.
- 2.3 The National Park Management Plan is the single most important policy document for a National Park Authority. It is a Plan for the geographic area of the designation not for a single authority or body. It sets out the collective ambition, strategy, and guidance to achieve the purposes of the designation as a partnership endeavour across a number of organisations. As a strategic over-arching document, it coordinates and integrates other policies, plans and strategies where these relate to the purposes and duties. It also guides the Authority's Corporate work and informs future policy development. The National Park Management Plan is, therefore, the principal vehicle for ensuring that the statutory purposes of the National Park are met.
- 2.4 Under Section 66(4) of the Environment Act 1995, National Park Authorities are required to review their Management Plan within the period of five years of its operational date and, after the first review, at intervals of not more than five years. The review determines whether it would be expedient to amend the Plan and what (if any) amendments would be appropriate, to make any amendments that are considered appropriate, and to publish a report on the review setting out any amendments made.
- 2.5 The Levelling Up and Regeneration Act 2023 (LURA) section 245, has amended the National Parks and Access to the Countryside Act 1949, such that relevant authorities in respect of their actions, decisions and operations 'must seek to further' the statutory purposes of Protected Landscapes (S245 Duty). Supporting the development of the National Park Management Plan offers a way for those authorities to understand and show commitment to fulfilling this duty. It is possible that there will be secondary legislation which will require that relevant authorities engage with and help delivery of National Park Management Plans. It is unclear if and when this will be enacted. Alongside the SDNPA, partners will also contribute to delivering the targets set out in the Protected Landscapes Targets and Outcomes Framework.
- 2.6 The Terms of Reference of the Policy and Resources Committee include reviewing and recommending to the NPA the adoption or revision of the Partnership Management Plan (the name for the SDNPA's National Park Management Plan) and monitoring and reviewing its delivery.

3. Issues for consideration

Our Approach

- 3.1 The Authority's approach to the review of the Partnership Management Plan (PMP) for 2025-2030 is informed by an extensive evaluation of how the 2020-2025 plan was developed, which was carried out in 2020 by external consultants, Heritage Insider. The recommendations and a checklist for our next review is at **Appendix I**.
- 3.2 The proposed approach to the review of the PMP will embed Equity, Diversity and Inclusion (EDI) in line with the recommendations of the evaluation, making the process more inclusive and co-designed with stakeholders. It will also ensure groups under-represented in the previous PMP are reached: young people, landowners and businesses, and local communities. Facilitation and engagement consultants have been commissioned to ensure we reach beyond usual partners and listen to those who have been missing from the dialogue. This approach will also ensure that SDNPA staff and members are treated similarly to other stakeholders as partners in the process. This will help to ensure the PMP is collectively owned.
- 3.3 The above approach is designed to increase buy-in and sense of shared responsibility for the ambitions and outcomes of the PMP across partners and stakeholders. And particularly for those partners, subject to the S245 Duty (as defined in paragraph 2.5) who will be delivering

alongside the SDNPA, to gain a commitment to a shared action plan, targets for delivery and monitoring of progress. It also allows staff to focus on contributing to the development of the content of the new PMP rather than managing lots of engagement activity themselves. The consultants have particular expertise in engaging diverse groups and young people. It is also to make the process of participating in the PMP review fun and something to look forward to for consultees.

- 3.4 Natural England have issued draft guidance for the production of management plans for Protected Landscapes in England. This was circulated in April 2024 and, notwithstanding the change in Government, all Protected Landscapes that are in the process of reviewing their plans are being asked to take it into account. We have therefore had regard to the draft guidance in considering how to carry out the review of the PMP.
- 3.5 [The Environmental Improvement Plan \(EIP\)](#), published in January 2023 is the first five-year refresh of the government's 25-Year Environment Plan. It is one of the core drivers of the PMP. As required by Natural England's Draft Management Plan Guidance, the PMP is required to incorporate key strategies and processes which transpose the EIP into action, such as the Local Nature Recovery Strategy and Catchment Management Plans, for instance. In addition, account will be taken of any known changes to legislation and any socio-economic, environmental and climate related drivers for change.
- 3.6 The [Protected Landscapes Targets and Outcomes Framework \(PLTOF\)](#) will also be considered during the review in line with Natural England's Draft Management Plan Guidance which states that "*National Park Authorities should incorporate the targets into their statutory management plans. Targets set a high level of ambition for Protected Landscapes*". Natural England will work with individual Protected Landscape bodies to apportion the targets set out in the PLTOF appropriately between them, based on local circumstances including potential partner contributions and other evidence. These targets, alongside any locally derived targets will need to be incorporated into the plan and linked to the delivery plan.

Assessments

- 3.7 As the PMP develops, the Authority is required, to carry out a Strategic Environmental Assessment (SEA). The assessment is required under the European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment", known as the Strategic Environmental Assessment or SEA Directive.
- 3.8 In addition, the Authority is required to carry out a Habitat Regulation Assessment (HRA), Equalities Impact Assessment and a Health Impact Assessment. The Habitats Directive is a European Council Directive 92/43/EEC of 21st May 1992 on the conservation of natural habitats and of wild fauna and flora. Transposed into law by the Conservation (Natural Habitats) Regulations 1994 (Habitats Regulation) as amended in 1997 and in 2000 (in England only) as amended in 2017 (SI 1012); and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (SI 1013). The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 579) amends both regulations. The Habitats Regulations are concerned with protection of European Protected Sites, namely Special Areas of Conservation (SACs) and Special Protection Areas (SPA). Any proposals affecting the following sites proposed SACs, potential SPAs, Ramsar sites - wetlands of international importance (both listed and proposed) and/ or areas secured as sites compensating for damage to a European site require an HRA because these are protected by government policy.
- 3.9 Consultants have been engaged to carry out this exercise. They carried out the SEA/HRA the last time the PMP was reviewed. They will build work already done on the Integrated Impact Assessment (incorporating SA/SEA/HIA and EqlA) and the Habitats Regulations Assessment for the South Downs Local Plan.

Timescale

- 3.10 It is anticipated that the review will be completed by December 2025, with approval of the finalised revised PMP at the National Park Authority meeting in December 2025. This is

outside the 5-year timescale for reviewing the plan and means the next PMP will run from 2026-31. There have been two key external reasons for the delay in reviewing the PMP. First is in relation to the Guidance on National Park Management Plans from Natural England. This guidance has been expected for some time and it was important to ensure the Authority developed the PMP in line with Natural England's expectations. Draft guidance was issued in April 2024. Natural England have now directed National Parks to continue to review their Management Plans having regard to this guidance. Second, the Authority was aware that a new targets and outcomes framework had been under development for Protected Landscapes. It was again important to ensure the PMP aligned with the national targets and outcomes. The PLTOF was published in January 2024. There were also some internal matters during 2024 which have contributed to a further limited delay, in particular changes to the Authority's Senior Leadership Team. Taking these factors into account and the need to follow, wherever possible, the timeline for review set out in the guidance, which includes effective and meaningful consultation and co-design of the PMP with partners, December 2025 is the earliest the review of the PMP can be completed.

- 3.11 Stakeholder engagement will start in late 2024 and continue through 2025, running alongside the evaluation of the delivery of the current PMP, which will also be carried out by the consultants. SDNPA staff will carry out a review of the State of the National Park Report (SoNPR). The consultants will ensure that the right information is fed in at the right time to allow a draft PMP for consultation to be considered by Members in May 2025, with final adoption of a revised PMP in December 2025. Delivery of the current PMP will continue until the revised PMP is approved. The timeline for the review is at **Appendix 2**.

Notification of intent to review

- 3.12 Under the Environment Act 1995 section 66 National Park Authorities must notify Natural England, Local Authorities whose area is wholly or partly within the National Park, and the Secretary of State for Defra of their intention to review their management plans and should provide with the notification, a copy of the previous management plan and any proposed amendments to the management plan.
- 3.13 The Draft Guidance on National Park Management Plans advises on what could be provided along with the notification to review. It advises a scoping process which should highlight the need to change content, develop new content or scrap old content. The draft guidance states that *"The scoping process should develop options for content and make recommendations. While agreed changes could be embodied in the final Scoping Report, reading both the original plan and the Scoping Report together could be so complex that a revised plan is the better option for clarity and convenience. In practice, the Scoping Report process usually results in developing a revised Plan, although plans vary in how much they differ from previous iterations."* In line with the draft guidance, as significant changes are expected to the current PMP, it is proposed that the Authority produce a revised PMP rather than a scoping report along with a copy of the current PMP and that the draft revised PMP is provided along with the notification to review to those listed in paragraph 3.12 of this report.

4. Options & cost implications

- 4.1 The Authority has £75,000 allocated to the PMP review (£35k agreed in March 2024 and £40k agreed in July 2024) for work required during this financial year. The majority of these funds will fund the two contracts let to support the review. Further funds will be required during the 2025/26 financial year to support the PMP review and these will come forward as part of the 2025/26 budget to be approved by the Authority.
- 4.2 In addition, a significant amount of staff resource will be allocated to developing the PMP. This is an estimate of the staff resources required to support the process: management and co-ordination 5 days a week split between the Performance and Projects Manager and the Performance and Learning Officer. Strategy Leads are likely to need to spend ½ a day a week from now until January and then 1-1 ½ days per week from January until May, and then back down to ½ a day a week over the summer 2025. There will also be a call on the time of staff across the Authority including Lead Rangers, Countryside and Policy Managers and members of the Senior Leadership Team. As we move into drafting of the plan there will

be calls on the time of the Communications Team, specifically the Communications and Engagement Manager but also the Communications Officers. Resource will also be needed from the Planning Directorate to align the PMP and South Downs Local Plan and input into the landscape and planning principles chapters.

5. Next steps

- 5.1 A report will go to the NPA meeting in October 2024 to seek approval for the recommendations from this Committee. The engagement and SEA assessment consultants will be bought on board and contracts, KPIs and stage payments agreed.
- 5.2 Consultants and staff will begin stakeholder mapping and hold initial discussions with key delivery partners about the PMP review and how they can get involved. We will also be mapping some key partner strategies to look for synergies.
- 5.3 A steering group is proposed to be appointed comprised of external partners and SDNPA Members and staff to oversee the review, in accordance with the Natural England draft Guidance on Management Plans in Protected Landscapes. The Committee is recommended to recommend to the NPA the approval of the proposed Terms of Reference of the steering group, which includes its membership, at **Appendix 3** along with a delegation to the Chief Executive, in consultation with the Chair of the Authority, to select and appoint the chair and members of the Steering Group and to determine the basis of those appointments including the terms and conditions and the payment of any allowance. The aim is to establish the steering group by the end of 2024.
- 5.4 As part of this process, the South Downs Partnership (SDP) is also reviewing its role with SDNPA officers. The SDP was set up to provide an external challenge and support to the work of the authority by championing the South Downs National Park, its vision purposes and the outcomes in the PMP, broaden engagement through individuals and groups, mobilise additional resources for the highest priorities in the PMP, maintain an overview of progress towards PMP outcomes, provide a forum for resolving conflicts between policy objectives and sectors and to give strategic advice and objective, independent feedback to the SDNPA.

6. Other implications

Implication	Yes*/No
Will further decisions be required by another committee/full authority?	Yes. A report will go to the NPA in October 2024 to approve the recommendations from this Committee. Any additional funding will be considered by the NPA. An additional NPA meeting in May 2025 will consider a draft of the revised PMP for consultation. The aim is for the final revised PMP to be considered at the NPA meeting in December 2025.
Does the proposal raise any Resource implications?	The financial resource implications are covered in paragraph 4 above. A significant amount of staff time will be needed to manage the review and to participate in developing revised outcomes and actions for a delivery plan. Relevant staff have this in their PDRs for this year and will have the time allocated in their forward-looking PDRs for 2025-26.
How does the proposal represent Value for Money?	Procurement processes for the consultants engaged have been carried out using MEAT methodology with the aim of obtaining the best possible value for money through that process.
Which PMP Outcomes/ Corporate plan objectives does this deliver against	This relates to PMP outcomes 1,2,3,4,5,6,7,8,9 and 10 and to all three of the corporate plan higher level targets, Nature recovery, National Park for All and Climate Action.

Implication	Yes*/No
Links to other projects or partner organisations	The review of the PMP is fundamentally a partnership exercise and the revised plan will be a shared set of ambitions, outcomes and an agreed delivery plan with measurable targets agreed with partners.
How does this decision contribute to the Authority's climate change objectives	The PMP will be one of the main strategic mechanisms to support action for climate change mitigation and adaptation. It will incorporate the climate change action plan we already have.
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?	An intrinsic part of the process is the carrying out of an equalities impact assessment which will be carried out early in the PMP review. We have also chosen to adopt a very inclusive approach to engagement through the use of consultants with particular expertise in this area which aims to ensure that as many diverse voices as possible are heard as part of the PMP review.
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?	H&S risk assessments will be carried out for engagement with groups. The Engagement consultants have been required to ensure that all staff working with vulnerable people are DRB checked, and they will be required to undergo SDNPA safeguarding training.
Are there any Data Protection implications?	It is likely that some data relating to partners will need to be collected to allow engagement to take place. We will ensure that all data protection principles are followed when dealing with personal data. Provisions on data protection for consultants are a standard part of the procurement process.

7. Risks Associated with the Proposed Decision

Risk	Likelihood	Impact	Mitigation
Lack of buy in from partners	4	4	Huge efforts are going into developing an approach which is inclusive and inspiring for partners. Section 245 of the LURA introduced a requirement for some organisations to seek to further SDNPA purposes and duty and participation in the PMP process goes some way to demonstrating that.

Risk	Likelihood	Impact	Mitigation
Failure of contractors to deliver agreed contracts	3	3	Strong performance management and contract management processes place.
Significant change in Government guidance or policy	3	3	Developing an understanding of government policy and drivers for change which is integrated into the process will help mitigate this risk but if things fundamentally change then the plan review may need to be put on hold or completed in a different way.
No budget allocated	2	4	If the additional resource is not allocated to the PMP review we will not be able to carry out the review as planned and would need to remodel how the review takes place. We would need to dismiss the engagement consultants and work out a different way to manage the extensive engagement we had planned. This would likely have a knock-on effect on frontline delivery as staff would need to divert to engagement activities

ANNE REHILL

Performance and Projects Manager

South Downs National Park Authority

Contact Officer: Anne Rehill, Performance and Projects Manager

Tel: 01730 819271

Email: anne.rehill@southdowns.gov.uk

Appendices

1. Recommendations and checklist from Heritage Insider review of
2. Timeline for the review
3. Terms of Reference and composition of the steering group

SDNPA Consultees

Chief Executive; Director of Countryside Policy and Management; Director of Planning; Chief Finance Officer; Monitoring Officer; Legal Services,

External Consultees

None

Background Documents

[National Parks and Access to the Countryside Act 1949](#)

[Environment Act 1995](#)

[Natural Environment and Communities \(NERC\) Act 2006](#)

[UK Environmental Improvement Plan](#)

Natural England Draft Management Plan Guidance for Protected Landscapes in England

Planning the journey to a visionary future; a review of the South Downs National Park Partnership Management Plan development process. Heritage Insider - September 2020

