

Response **to the SDNPA's Consultation on the**
Draft Partnership Management Plan (DPMP)

Shaping the future of your South Downs National Park 2014-2019

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Introduction and General Statement of Support

SDLMG speaks for the land management community within the National Park area. SDLMG has over 200 business members and embraces farmers, foresters, landowners and other sector professionals such as NFU and CLA and land agents within its Executive Committee. This sector has created and continues to maintain the **special qualities of the Park's** landscape.

We support the principle of a comprehensive PMP for the National Park, and applaud the amount of work the officers and members have clearly put into the DPMP. SDLMG, and also many of its land manager members individually, have had opportunities to comment during the evolution of the DPMP. We welcome the consultation that has been carried out to date, and the inclusion within the DPMP of policies we recognize as important to our community and landscape.

The Policies have already been the subject of extensive consultation and most of these are supported and welcomed by SDLMG simply as they stand. The majority of our comments in this consultation response therefore relate to the Outcomes (and their Indicators), and to the Delivery Framework.

Despite the consultation being at harvest season, some SDLMG members will already have submitted individual responses addressing various points of detail. This Organisational response does not aim to repeat all of them. It sets out the main improvements which we believe still need to be made to provide the basis for successful future partnership working of the land management community with the National Park Authority.

Pointing out problem areas is comparatively easy, finding the right ways and words to resolve the problems is harder. We have suggested some specific wording amendments as possible solutions to some though not all of the gaps we have identified in the Draft Plan; these are only suggestions and other solutions may be equally good. If further assistance is needed we will be happy to meet with SDNPA Officers to help make this a truly excellent Partnership Management Plan for the South Downs National Park.

Problem areas in the current Draft Plan

The aspiration to make this a ‘Partnership Management Plan’ rather than a ‘Park Authority Management Plan’ has been clearly stated. The Delivery Framework succeeds in that it includes Areas of Delivery where it is easy to see other public bodies as well as the Park Authority achieving things, for example Local Authorities such as County Councils, Registered Charities such as RSPB.

But in this National Park where, unlike any other, the landscape is being maintained almost entirely by profit-making land-based businesses, **a ‘Partnership Management Plan’ has to be more than a ‘Public Bodies Management Plan’.**

We have a general concern about the Outcomes and Indicators section: the Outcomes do not sufficiently reflect **the 2050 Vision’s specific references to** farming and forestry. The link to the management of the land is quite simply missing from most of the Outcomes and their Indicators where it should be present. The principal Partners and Managers are recognized in the policies but are **almost entirely invisible when it comes to Outcomes and their Delivery. This ‘disconnect’ should be** addressed as a priority before the Plan is finalized.

- If the *Outcomes* are not altered to recognize the contribution that is being made by land managers, how will that contribution be sustained and grow to achieve the 2050 Vision?
- How can the *Areas of Delivery*, which flow from the Outcomes, possibly deliver substantial progress towards the 2050 Vision without the contribution of farming and forestry?
- How can the vital partnership working of the SDNPA with the land management sector be managed unless there are appropriate *Indicators* for productive and beneficial farm business activity to measure its success or otherwise?
- How can the *Delivery Framework* be said to **“show and monitor activities that contribute to its vision” (Q8 of the survey)** unless it does so in the land management sector, where most such activities always have and always will take place?

How has the DPMP come to be so deficient in recognizing and considering how to promote the largest **area of delivery in the Park, the land management sector? The statement on p12 regarding ‘The need to prioritize the issues’ may contain the answer:**

A key task has ... been to focus this PMP on those [issues] which are significant and urgent, and where collective action through partnerships can make a tangible difference over the next 5 years.

That was rightly identified as a key task. But somehow the issues perceived as significant and urgent, and the focus on specific partnerships (as distinct from more general partnership with the land management sector), have blinded the current draft to the elephant in the room and to the core issue **for the Park’s** outcomes.

We raise as major concerns, the inadequate recognition in the Plan of the importance of outcome delivery by land managers, and specifically also the lack of consideration in the Plan of land management Incentives (other than mention of agri-environment schemes). These are significant omissions in the Draft Plan which we believe need to be addressed as priorities for the final version.

The 'elephant in the room' of this Draft Plan: Incentives and Recognition for Land Management

Working in Partnership with the free market commercial sector of land management business, has to be thought about differently from working in Partnership with other publicly accountable bodies such as local authorities, which must legally have regard to the Management Plan, or environmental charities, whose public funders enable and are entitled to hold them accountable for environmental performance. For these organisations, spending time and money on delivering the Plan is part of what they are set up and paid to do.

Land management businesses by contrast are paid by their customers to deliver crops and food at competitive prices to agreed quality standards. They have to achieve competitive prices in a global market yet also make profit and reinvest it in their businesses to maintain competitive performance. In many cases a large part of what it takes to fulfil the Park Vision is delivered by them incidentally just by staying in business and doing it well. But for the rest, a choice needs to be made by the land manager, and being a free choice the Management Plan needs to consider Incentives.

The biggest challenge which this Plan needs to address is Incentives, making the most of the money that is available and looking for the money that is going to be needed to fund ecosystems services in the future. The Plan needs **to state the Park Authority's intention over the 5 years of the Plan to work** at finding and deploying Incentives, both to enable and to motivate continued and enhanced favourable land management. The economics of environmental management will depend on a range of more diverse payment sources for ecosystem services, as CAP payments decline and market forces gain strength, in addition to the goodwill achieved through communications, support and recognition.

For example, in Outcome 2: the essential contribution of farmers to this landscape Outcome is **hidden behind the word 'capacity'**. Capacity of **'the landscape'** to adapt to future pressures will be dependent on **the Park's land management businesses thriving** in the global free market. **The SDNPA needs to make clear in the Plan its understanding that you don't get a thriving** landscape in the South Downs without a thriving land management sector.

- The Park Authority can help land managers thrive and promote their capacity to manage and adapt the landscape as needed, through supportive planning and communications.
- It can also do so by influencing the availability and uptake of enabling and motivating Incentives to land managers, both from agri-environment schemes and from other and new funding sources.

Taking Outcome 8 as another example: the Areas of Delivery recognized in the Plan need to include uptake by land managers of more diverse funding **schemes for 'direct action ... to conserve and enhance'**. Other sources already include eg SCF, local Council schemes, landfill tax credit schemes and Trusts. **As part of the Authority's management to achieve the** Outcomes, it needs to develop additional sources and promote such sources where they already exist to land managers, through the External Funding and Operations teams, and where appropriate in the context of Farm or Estate Conservation Plans.

\ Incentives & Recognition cont.

SDLMG has been a keen but, it has to be said, partly disappointed Partner in one such new Incentive scheme, the NIA. In this case the Incentive element to local land managers was removed by the Authority under a Framework Contract which whilst ticking accountability boxes for Finance and simplifying management for the Operations, nevertheless in our view would tend to frustrate the Purposes and Duty, and Vision. After protest, the Incentive element and the possibility for local land managers to be paid for doing local work was reinstated as an option; but never positively promoted.

We need to see, in a *Partnership* Management Plan for delivering the Vision, some commitment by the SDNPA management, to a positive approach to developing land manager engagement through Incentives.

Money is not enough in itself but it can be both enabling and motivating to land management businesses. It is likely to be even harder to get in the future. Working at securing the funds and their uptake needs to be part of the Plan.

The Plan also needs to do more to provide the easiest and cheapest of motivating Incentives: giving specific recognition in the Partnership Management Plan to the Outcome Delivery work our members do every day.

An example of the problematic omission of this recognition from the Plan (other than in the Farming and Forestry policy sections) is in 2.13, the General Policies Context for 'People Connected with Places'. This is **exclusively focussed on 'visitors and residents'**. It makes no reference to the community of those that manage the land as part of their profession and way of life. Yet these are **the 'people connected with places' whom the Park most needs, for the achievement of its Purposes, to maintain support and motivate in that connection**. Many of these are **to be sure also 'residents', but not all**; and **more importantly, the term 'residents' does not embrace them in their capacity as land-based workers; still less, the term 'visitors'**.

In order to become a South Downs '**Partnership' plan**, the DPMP must provide an adequate basis for **engaging over 'Delivery' with the many land managers who** are almost entirely responsible for maintaining the landscape. It must in its Delivery Framework give recognition, in one or more specifically listed Areas of Delivery under each of the Outcomes, to the work that will need to be done by land managers to deliver these outcomes, whether **through 'business as usual'** or in progressive new ways.

Specific and detailed comments by theme:

A Thriving Living Landscape

Farmland and forestry have an acknowledged vital role in the Vision. This is recognized in the separate policy sections for those sectors.

This vital role is however not currently recognized in the wording of Outcomes 1-4 and their Indicators. Some changes are needed to address this.

For example, we suggest a change to Outcome 2 as follows:

There is increased capacity within the landscape for its natural resources, habitats and species, and for land management which supports them, to adapt to the impacts of climate change and other pressures.

To support the PES (Payment for Ecosystems Services) approach proposed later on as a Delivery Area for this Outcome, Outcome 2 needs to refer explicitly to economic and not just ecological '**capacity to adapt**'. As it stands, the Outcome refers only to ecological resilience.

A THRIVING LIVING LANDSCAPE also lacks any indicators for the farming sector (although it does have **a forestry sector indicator, 'Percentage of woodland that is managed'**). **Therefore we** propose there should be a comparable Farming Indicator for Outcome 2: for example this could be

Percentage of farmland area that is managed under agri-environment or other ecosystem service agreements.

Whilst it is important to recognize explicitly that farmland can also be favourably managed outside environmental agreements, this would still be a useful indicator both of certain kinds of environmental work being done by farmers, and of taxpayers' **partnership** contribution to this work.

Similarly in the Sector Policy sections under this heading:

Section 2.6 Farming sector context - This text is generally very good but is perceived as failing to adequately reflect the importance, to food production and to the community of the Park, of those farm businesses which are solely or mainly arable. We suggest that to address this perception the third paragraph be amended to commence as follows:

Food security is an international priority to ensure the world's population can continue to be fed, and there are some highly productive arable farms within the Park. Most of the National Park is grade three or four agricultural land, which can provide particular challenges ...

VA Thriving Living Landscape cont.

Section 2.7 Farming policies - These policies are welcomed in particular the very important recognition in Policy 16 that core farm business infrastructures as well as complementary diversifications must continue to develop for the sector to be sustainable in the Park.

The footnote to Policy 16 **reads** "*Sustainable farming in this context is profitable farming that operates in harmony with the environment, adapting as necessary to avoid long-term harm to the special qualities of the National Park.*"

This is a good short definition. Through the **word 'profitable', and through aspects of the special qualities**, it does seek to include the economic and social as well as the environmental pillars of **sustainability. However the term "in harmony with the environment" will mean very different things** to different readers. A more accurate, meaningful and useful formulation would be

"operates in a way that is integrated with environmental considerations, adapting ..."

Policy 14. The following amendment is suggested to take account of the (likely increasing) importance of other incentives in addition to agri-environment schemes (the recent SDLMG paper to the SDNPA-SDLMG Liaison Meeting refers):

Support land managers to access and maintain agri-environment schemes and other funding incentives that deliver...

Section 2.4 Water Sector context

The fifth line from the end is perceived as singling out farming from other unmentioned sectors (eg sewage plants, transport, other industry) in an unhelpfully negative way, and the following amendment is therefore suggested:

There are strong links between pollution and ~~poor farming~~ commercially driven practices in various sectors, especially for example in farming on the thin chalk and sandy soils that, being vulnerable to erosion, increase sediment levels in rivers.

Specific and detailed comments by theme:

People Connected with Places

The connection of people owning and working in land-based businesses, to the landscape and special qualities of the National Park, is vital to achieving the Vision. The connection of mutual understanding and respect between land managers and the general public is also important.

These vital connections are not currently adequately recognized in the wording of Outcomes 5-8 and their Indicators. Some changes are needed to address this, for example:

Outcome 5 emphasises the high quality access network but the Outcomes fail to mention the need to manage public understanding of what is and is not appropriate and permitted access, in a National Park that is generally privately owned. Some good initial work has been done on this by the Authority as this was early agreed to be an important management area. Management of this aspect needs to continue and the Management Plan therefore needs to refer to it.

Policy 27 may hint at this management challenge ('reduce conflicts') but that interpretation is not supported by the Outcomes as currently worded.

There are three Indicators suggested under Outcome 5 but these are all visitor oriented. Crucially, none of them refer to managing the impact of those visitors on the landscape and on those who live and work in it. This omission needs to be remedied in some way. We suggest a new Indicator such as:

Percentage of land managers satisfied that education and signage are reducing disturbance to wildlife and land management through un-permitted and inappropriate access.

Whilst commenting on People Connecting with Places:

- Policy 38 on managing car parks is important and potentially land managers may be able to help with provision. However the cost-benefit and management of associated liabilities and risks for private car parks will need to be understood. Cooperation between the SDNPA and Local Authorities over the management of publicly owned car parks will also be important.
- In the definition of Open Access in the Glossary, **the intention of the term 'Unrestricted access' is clear to us** ie not restricted to a footpath, but as it could obviously be misinterpreted by the general reader (re dogs, vehicles etc), it needs to be changed.
- An Outcome and Indicators should be included under this heading relating to matters such as Rural Crime /trespass /wildlife crime. This would help to address concerns about the sustainability of favourable land management including mixed farming in certain parts of the Park.

\People Connected with Places cont.

Outcome 6 could be improved to include Recognition of the role of land management in the landscape as follows:

There is widespread understanding of the special qualities of the National Park and the benefits ~~it provides~~ provided by the landscape and the land-based businesses that have developed and manage it.

Under Outcome 7, one of the Indicators could be changed as follows:

Number of people training in traditional crafts and in farming and forestry skills.

Bringing on the next generation in modern agricultural and land based skills is at least as vital to the Park landscape as the teaching of traditional skills.

Under Outcome 8, **the focus of 'direct action ... to conserve and enhance' is entirely on 'visitors and residents'. In reality the people who have most opportunity for 'direct action ... to conserve and enhance' are the people working in businesses**, especially farm and other land management businesses. Their beneficial influence on the landscape, especially where funding incentives are available, **is likely to be greater than that of 'visitors and residents'**. Therefore we suggest this Outcome be changed as follows:

More direct action and responsibility is taken by visitors and residents and more funding incentives are used by businesses to conserve and enhance the special qualities and use resources more wisely.

An Indicator measuring this Outcome 8 could be, for example:

Number of farmers entering, renewing or engaged in agri-environment or other ecosystem service agreements.

This differs from the similar Indicator suggested under Outcome 2 above in measuring the number of business leaders engaged rather than the area of land affected. Whilst it is here similarly important to recognize that farmers can also manage their landscape well outside environmental agreements; the number of farmers doing so in this way would still be a relevant indicator.

'People Connected With Places' is the heading under which land managers, and others closely involved with local community life, would expect to see reference to localism in the management of the planning process. Where applications are to be decided by the Park Authority, the length of the Park from one end to the other brings with it the likelihood that planning committee members will not have sufficient local knowledge to help planning officers arrive at the most locally appropriate decisions. An Outcome/Policy/DeliveryArea that involves more local people in local decisions, would **improve the Plan's capacity to deliver in terms of 'People Connected With Places'**.

[Note on 2.6 Land use statistics - **It states here that 85% of land is 'classified as agricultural' whereas in 2.8 it states that 'Woodland constitutes 24% of land'. Both figures may be right but as currently presented the overlap is confusing to readers.**]

Specific and detailed comments by theme:

Towards A Sustainable Future

Sustainable land management business activity is vital to both the Purposes and the Duty of the South Downs National Park. In general we support the policies under this heading and we recognize the intended inclusiveness of references to communities and businesses. Nevertheless, specific mention of the land management sector is a particular omission in this section.

Whilst the DPMP recognizes that ‘the only thing that is constant is change’, and therefore it is constant change that has created the special qualities for which the Park has been designated: there is a risk that the Management Plan as currently drafted could create or support a culture which is unreasonably fearful of supporting continuing change.

To prevent an anti-change culture arising out of a strategy described as ‘managing the pressures upon the NP’ and ‘the cumulative effects of small scale change’, it will be necessary to make more positive statements which emphasise that there is a need for imaginative and sustainable business developments to continue to characterize the South Downs landscape. This is clear enough within the **Special Qualities as ‘embracing new enterprise’: it is not clear enough within the Management Plan.** The DPMP needs explicitly to welcome well-managed change and development within the Park as one of the springs of its Special Qualities.

The section on ‘major development pressure’ ends:

Individual small changes to landscape, settlements or buildings can add up incrementally over time, leading to urbanisation and loss of landscape character.

On its own, this is inappropriately negative and very far from ‘embracing new enterprise’. We suggest the wording here should be corrected by adding:

... or to well designed enhancement of the built landscape and community life.

The Draft Plan would be improved by the inclusion of some specific land management sector related Outcomes / Indicators under this heading. We propose some changes to address this.

Outcome 10 ‘**diverse and sustainable economy**’: we suggest adding an Indicator such as:
Number of planning applications granted for improvement of land-based businesses.

Outcome 11 ‘**employment and livelihoods**’: we suggest adding an Indicator such as:
Number of people working in land-based businesses operating in the NP.

Outcomes 10 and 11 are both carefully phrased to include enterprises that are positively linked with or based on the special qualities of the NP. They do not exclude support for enterprises that are not based on the special qualities. This is very important for the well-being of the community of the Park

in a diverse modern economy. Unfortunately this inclusiveness is only implied and not stated. There is a risk that some concerned in local planning might over-interpret these policies, as a basis for opposing development of enterprises not based on the special qualities or positively linked to them. A clearer statement of inclusiveness would help to forestall this tendency.

Policy 50 support for High Speed Broadband is particularly welcomed. Mast permissions may create opportunities, to help masts blend in to the landscape, for new small woodland plantings which would benefit the landscape and ecology of the Park.

Specific and detailed comments by theme:

Delivery Framework, Monitoring & Table

As an acknowledged '**work in progress**' we will welcome opportunity to comment as this section evolves, and we will not offer much comment on the detail here until the Delivery Framework is further developed.

As a general observation on the Delivery Framework table section: some rewriting would be helpful to reduce the amount of technical jargon and acronyms in the current draft of the Delivery Framework, as these will tend to switch off the layman completely at just the stage they ought to find most interesting.

More specifically, a few small but important omissions are worth pointing out at this stage.

3.2 Making a difference – together

Para 2 ... *These provide a framework for the many smaller community, volunteer, farmer and **landowner projects that will ...***

Para 3 ... **support, celebrate and share what Parish Council, voluntary and community organizations, and individual farmers and landowners, are doing for the National Park.**

Together, better including land managers.

Other examples of important stakeholders with influence and a role to play

This section lists National Trust, South Downs Society, RSPB, Wildlife Trusts and others. Whilst recognizing that the sectors of Farming and Forestry are mentioned in the next table; we note that the above organisations are referred to by name, and not just collectively as eg 'the Conservation sector'.

The **South Downs Land Management Group** is the sector representative and association of farmers foresters and landowners and other land-based sector professionals within the National Park. SDLMG has a wide range and distribution of organisations as members, and a Memorandum of Understanding and Partnership with the Authority. Likewise the NFU and CLA represent and speak for major sectors within our constituency. Given the vital role and influence of those who own and manage the land in the Park, we would be concerned if these three organisations were not also recognized by the Partnership Management Plan, in the next Draft, **as "important stakeholders with influence and a role to play"**.

/end.