

## Annex 5

### Why it is ‘Especially Desirable’ to Confirm the Designation of the South Downs as a National Park

Proof of evidence of Paul Harris Millmore B.A. Combined Hons

of

6 Grange Road, Lewes, East Sussex.

#### **1. Biography**

- 1.1 Until recently I was a freelance Conservation Consultant working for the YHA, National Trust, Sustrans and others. Prior to this I was in charge of Recreation & Countryside Management for East Sussex County Council. I am currently Director of the Society of Sussex Downsmen – a local conservation charity which has the principle objective of preserving the environmental quality of the South Downs. It is a member group of the South Downs Campaign (SDC).
- 1.2 Between 1974 and 1991 I was specifically responsible for the management of the Sussex Downs Area of Outstanding Natural Beauty (AONB) in East Sussex and helped establish the Sussex Downs Conservation Board (SDCB).
- 1.3 As a resident of Lewes since 1972 I and my family have enjoyed walking and cycling over the Downs
- 1.4 Since 1998 I have been a Countryside Agency appointee on the Sussex Downs Conservation Board and I am presently Vice-Chairman of its Planning Committee. I am also one of its representatives on the South Downs Access Forum, a member of the Tourism without Traffic Project steering group and the Recreation and Tourism Topic group advising on the production of an Interim South Downs Management Plan.
- 1.5 I am author of the official National Trail Guide to the South Downs Way.

#### **2. Why a National Park in the South Downs is ‘Especially Desirable’**

- 2.1 There is no doubt that the designated South Downs National Park is of ‘outstanding natural beauty’ and also offers a ‘superior recreational experience’. Thus, one can only seriously question the principle of establishing a National Park by arguing that such designation is not ‘especially desirable’ and that the models of the Sussex Downs Conservation Board and the East Hampshire AONB Joint Area Committee (JAC) work well to protect and enhance the area.
- 2.2 The SDC would wish to refute such a premise. Despite the sterling efforts of the two organisations’ staff, the SDC argues that the only practical and sensible way to

## Annex 5 – Why it is ‘Especially Desirable’ to Confirm the Designation of the South Downs as a National Park by Paul Millmore

conserve the future of this treasured landscape is through the establishment of a National Park. Such status would offer the secure and enhanced budgets and long-term conservation/enhancement opportunities that are missing from the alternative model of management.

### 3. Why a National Park Authority would work better for the South Downs than a CROW Act Board

- 3.1 Firstly, one has to recognise that the SDCB was set up in 1992 as a 6-year national experiment with the aim of exploring a management model for AONBs in response to particular local concerns about the effective management of this large and complex area. This experiment has now run for over a decade and, during its lifetime, it has received ‘exceptional’ levels of government funding via both the Countryside Commission and later the Countryside Agency. (This exceptional funding has absorbed on average over 30% of the Agency’s national AONB annual budget). It is quite clear that the Countryside Agency (CA) cannot, and should not, continue to maintain this level of experimental funding indefinitely. In January 2002 a report was presented to the SDCB as an update on the National Park designation process which stated<sup>1</sup>:-

*“The Agency has been asked to suggest how much money it might theoretically allocate to a South Downs Conservation Board [ie covering both AONBs]. Applying to the South Downs the funding formula which it is using to allocate new funds available to it for AONB management nationally [under the CROW act], the Agency suggests a figure (based around the Board’s 2000 – 2001 Business Plan) of less than £300,000, which is significantly less than its current funding of the Board and the East Hampshire JAC”*

- 3.2 Current funding from the CA for the two bodies which currently manage the East Hampshire and Sussex Downs AONBs is around £800,000 per annum.
- 3.3 Clearly things can only get worse for the two AONBs if they continue to maintain this level of countryside status unless the local authorities step in and greatly increase their funding. Past experience of levels of funding to the existing SDCB and JAC show that such a radical change is, at best, a local politician’s ‘pipe dream’. It is worth noting that the Chilterns’ AONB Grant in 2002/3 from the CA was only £251,000, and the largest AONB in the country, the Cotswolds, only received £371,000 from the CA in the same financial year.
- 3.4 Despite the current enhanced funding of the SDCB it is still not possible to achieve all that is even statutorily required. For example, in the same January 2002 paper<sup>2</sup> it was pointed out to Board members that “...there is already a £800,000 backlog of capital

<sup>1</sup> Appendix A –SDCB Report 18 January 2002, Agenda Item No. 7 – A South Downs National Park: Designation Process – Report by the Sussex Downs Officer and Clerk to the Board, para 3.4 – Inquiry Document No: 3275/3/3

<sup>2</sup> Appendix A – SDCB Report 18 January 2002, Agenda Item No. 7 – A South Downs National Park: Designation Process – Report by the Sussex Downs Officer and Clerk to the Board, para 8.6 – Inquiry Document No: 3275/3/3

## Annex 5 – Why it is ‘Especially Desirable’ to Confirm the Designation of the South Downs as a National Park by Paul Millmore

*works required to the (rights of way) network (in the Downs) and many legal issues to resolve.”* This is a conservative estimate and clearly indicates both the scale of the problems and the local authorities lack of commitment to resolving them. They have had over a decade to show how much they care for the Downs and are still sadly lacking.

3.5 The Chief Officer of the SDCB admitted at a recent meeting that he does not have the finance to research or produce an adequate joint management plan for the South Downs<sup>3</sup>. So, over ten years into the experiment:-

- a) There is no comprehensive management plan for the Downs – even the SDCB admit that it will be some years before such a final plan will be achieved.
- b) The SDCB and the JAC do not yet have the relevant information to produce such a plan. For example the SDCB and the JAC are having real difficult in ascertaining:
  - How many listed buildings there are in the Downs
  - How many scheduled ancient monuments there are in the Downs
  - How many tree preservation orders there are in the Downs
  - How many miles of traditional hedgerow, dew ponds, flint or dry-stone walls there are in the Downs
  - Any idea of the state of repair/condition of the above elements of natural capital in the Downs
- c) The SDCB does not have the following dedicated professional expertise on its staff:-
  - An Archaeologist
  - An Ecologist
  - A Landscape Architect
  - A Minerals/Geological Expert
  - A Marine Environment Expert
  - A Rights of Way Expert
  - A Legal Secretariat
  - A Treasurer

Whilst this sort of expertise can be bought in, the Board has insufficient finance to do so and would have even less if the experimental funding ceased and it had to operate under the CROW Act financial regime. Recently the SDCB attempted to commission a local distinctiveness study of the Downs but had to abandon the project when it found it had insufficient funds to match the tender prices.

Whilst the two County Councils have provided a free Secretariat and Treasurer over the experimental life of the Board, it is doubtful they could sustain this cost free for

---

<sup>3</sup> Appendix B – SDCB Report 17 January 2003, Agenda Item No. 10 – A South Downs Management Plan – Report by the Sussex Downs Officer and East Hampshire AONB Officer, para 5.2 – Inquiry Document No: 3275/3/3

## Annex 5 – Why it is ‘Especially Desirable’ to Confirm the Designation of the South Downs as a National Park by Paul Millmore

the life of a CROW Act Board. There have also been concerns about the independence of the SDCB as a result of this arrangement, particularly with regard to West Sussex County Council which as the largest contributor to the Board and in charge of the Board’s secretariat<sup>4</sup>.

- d) There is no secure, long-term funding base for Downland management. Every year the SDCB and JAC staff have to bid to both the CA and the local authorities for sufficient funds to ‘keep going’. Under the present CA and local authority financial strictures this task can only become more difficult – even with a statutory Board under the CROW Act. By contrast National Parks are funded under a formula that ensures an assured level of base funding enabling them to plan further into the future.
  - e) There is no adequate system for ensuring that the relevant local authorities (mostly District Councils) meet their requirements to clear litter under the Environmental Protection Act. Many roadside verges in the Downs are strewn with litter. If there was a real commitment from the local authorities to the AONB environment this would not be the case.
  - f) There has been no consistent commitment from the planning authorities (mainly District Councils) to listen to the non-statutory planning advice of the SDCB. The local authorities initially go against the advice of the SDCB Planning Committee in between 30 and 40 percent of planning applications that they consider<sup>5</sup>. A crucial difference between a National Park Authority and a Conservation Board is that the former would have full planning powers. This would ensure a park-wide planning strategy which would ensure a consistency of planning decisions which is lacking at present. It would also reduce bureaucracy, while increasing clarity and certainty, both for developers and the public alike.
  - g) The SDCB and the JAC have no ability to own, or purchase land – even if it were in the best interests of managing the Downs. Many important opportunities have been lost because of this.
  - h) Soil erosion, due to inappropriate farming techniques, is still a serious problem on the Downs. For example, Dr J Boardman of Oxford University Environmental Change Unit has been urging action for decades but both the Local Authorities, the farming community, the SDCB and the JAC have done little to tackle this serious conservation issue. Further evidence on this will be provided later in the inquiry.
- 3.6 Effectively the SDCB and the JAC are overseeing the gradual degradation of the Downs rather than their sustained conservation and enhancement. This is particularly galling when one finds some local authorities arguing that a CROW Act Board would be more democratically representative than a National Park Authority – when the latter has more parish council representatives than a Board. A CROW Act Board would not command the respect of all as the issue of independence could remain in

---

<sup>4</sup> Appendix C – A Question of Independence – Inquiry Document No: 3275/3/3

<sup>5</sup> Annex 4 – SDCB Executive Committee Report 6 June 2000, Agenda Item No. 7 – Analysis of Consultations Monitored – Report by the Sussex Downs Officer, para 2.3 – Inquiry Document No: 3275/3/3

question. With significantly less CA funding than the SDCB and JAC it would be even more reliant on local authorities for its continued existence.

- 3.7 If one combines the evidence above with the clear, de-facto superior recreational use of the Downs by the growing population of SE England and the obvious ‘outstanding beauty’ of the area, then it is, without doubt, ‘especially desirable’ to designate the South Downs as a National Park. A National Park Authority could start to think about what the Downs should look like in a hundred years from now and develop management policies and practice to fit. Eyesores that have plagued the downland landscape for years could be removed, key access areas could be acquired or negotiated, the flint walls that are a characteristic element of the ‘sense of place’ could be repaired, habitats could be restored, archaeological and geological features could be properly interpreted and the South Downs National Park could become a special place that this generation passes on the next in a better state than they found it.

#### **4. Conclusion**

- 4.1 I urge the Inspector to recommend to the Secretary of State that the designation of the South Downs as a National Park be confirmed.

Paul H Millmore, (Member of the Sussex Downs Conservation Board)

2 June 2004