

South Downs National Park Public Inquiry

Part 4: Administration

Land / Foreshore Management ***Landscape Enhancement***

Proof of Evidence

by



September 2004

1 Introduction

- 1.1 The South Downs Campaign (SDC) submits the following proof of evidence for the administration of landscape enhancement within the designated South Downs National Park.
- 1.2 The SDC is a network of organisations working for the best possible South Downs National Park, representing over 90 national, regional and local groups and organisations¹.
- 1.3 This proof of evidence is part of a series of submissions to the Public Inquiry by the SDC and should be read in the context of the SDC's written proofs of evidence 'SDC 'In Principle' Support for the South Downs National Park'² and 'Institutions and Management'³ and 'Agriculture and Land Management in the South Downs'⁴.

2 Background

- 2.1 Much of the discussion on landscape enhancement for the South Downs focuses on agriculture and the opportunities to restore chalk grassland and heathland habitats. The importance of this is not disputed and indeed is something that the SDC fully supports and has commented on in detail in another proof of evidence⁵. However, in this paper, the SDC wishes to bring to the attention of the inspector, a whole range of other opportunities which need to be woven into the long-term thinking and budgetary requirements of the South Downs National Park Authority (SDNPA). By assessing how these opportunities are being seized in other National Parks, the paper demonstrates why a National Park Authority will be the best form of administration for delivering the enhancement purpose enshrined in National Parks legislation.
- 2.2 The creation of a SDNPA would enable some long term visionary thinking to be applied to these problem areas. The scale, complexity or cost of resolving these landscape issues has, to date, deterred local authorities and others from taking any significant action. With Section 62 of the Environment Act placing its duty on relevant authorities to have regard to National Park purposes and the National Park Management Plan, the creation of a South Downs National Park will be particularly helpful in furthering the long term landscape enhancement agenda. Something that is absent at the moment. In addition, a SDNPA is far more likely to get its teeth into these sort of common landscape issues than any other local authority because it has a single purpose; can potentially bid wider for monies; and is unlikely to be distracted by other agendas.
- 2.3 The need for enhancement is by no means a reflection of the quality of the South Downs landscape, nor does it affect its suitability for designation as a National Park. After all, the primary purpose of a NPA is not only to conserve the natural beauty of

¹ SDC Biography – Inquiry Document No: 3275/1/1

² SDC 'In Principle' Support for the South Downs National Park – Inquiry Document No: 3275/3/1

³ SDC proof of evidence: Institutions and Management – Inquiry Document No: 3275/40/1

⁴ SDC proof of evidence: Agriculture and Land Management in the South Downs – Inquiry Document No: 3275/42/1

⁵ SDC proof of evidence: Agriculture and Land Management in the South Downs – Inquiry Document No: 3275/42/1

its area but also to enhance it. Therefore, pursuing the sorts of improvements described in this paper would allow the SDNPA to fulfil one of its primary statutory purposes. The South Downs is no different to other National Parks, which have inherited damaging development or activity from a time prior to their creation (for instance quarrying in the Peak District or historical military use in Dartmoor). By vigorously pursuing their enhancement purpose National Parks are well placed to ameliorate such legacies and deal with emerging threats to their landscapes.

- 2.4 Another concern, arising out of the need for enhancement is the financial implication for the SDNPA. This paper is not a bid for funding for the NPA, from either central government or anywhere else. However, it is intended to give some idea of the nature of the enhancements that should be considered by a National Park Authority.
- 2.5 The production of the Management Plan and its regular review will be a guide to central government on an appropriate level of funding for the NPA. The Management Plan will outline priorities and potential sources of funding for any enhancement projects or strategies it wishes to undertake. Meanwhile, in the absence of a SDNP Management Plan when the authority is first established, the Interim South Downs AONBs Management Plan is likely to contain information that may help inform initial funding. It is important that the SDNPA is able to put such a programme of improvements together (which would need to be costed and prioritised) that would be taken forward as and when they could be afforded. These are outlined in the following section.

3 Types of Enhancement Initiatives

- 3.1 The main types of landscape enhancement fall under the following categories, although it should be recognised that some issues could come under several headings and that items under the same headings may require very different solutions. These are listed in no particular order of priority and are not intended to be exhaustive but rather a broad cross-section of the types of problem that are tackled in other National Parks and need action in the South Downs:
- Agriculture (the issues under this heading are mostly dealt with in another SDC paper⁶)
 - Archaeological degradation
 - Diversification
 - Habitat restoration (chalk downland, heathland and other)
 - Plastic sheeting and tunnels for crops
 - Soil Erosion
 - Subdivision

⁶ SDC proof of evidence: Agriculture and Land Management in the South Downs – Inquiry Document No: 3275/42/1

- Eyesore removal, replacement, screening or relocation
 - Car parks
 - Caravan and camping sites
 - Derelict buildings and structures (mainly agricultural but some WWII)
 - Dumping of old cars, rubbish (fly-tipping) and redundant farm machinery
 - Inappropriate planting
 - Intrusive and poorly designed non derelict structures (including steel / asbestos farm buildings)
 - Overhead cables
 - Skyline / poorly sited or redundant fences
 - Telecommunications masts

- Highway / Planning / Environmental Impact Issues
 - Advertisement Control
 - Coastal Defence Works
 - Enforcement
 - Highway and building design
 - Light Pollution
 - Tranquility / noise
 - Village and Townscapes
 - Water Abstraction

- Restoration and maintenance of special features
 - Canals and canalized rivers
 - Dew Ponds
 - Flint Walls / Hedgelaying
 - Parks and Gardens
 - Protection of Elm Trees and other trees under threat
 - Windmills and Follies

3.2 There are number of different ways in which it will be important for a future SDNPA to work to tackle the issue of eyesore removal and landscape enhancement. Most of these fall into three categories:

- One-off action / payment (specific eyesore removal or screening)
- Negotiation and partnership working to tackle specific issues / strategies (e.g. tranquility strategy with Highways Agency or undergrounding overhead wires)
- Ongoing maintenance and repair of special features (including training of skills to allow this to occur) (e.g. for flint walls)

4 Existing schemes in the South Downs

4.1 Aside from the Environmentally Sensitive Area scheme which is gone into more detail in the SDC proof of evidence ‘Agriculture and Land Management in the South Downs’⁷, there are few examples of enhancement schemes which have been, or are being, carried out in the designated South Downs National Park area. Where action has been taken, it has only been possible on a short term or ad-hoc basis with no real strategic long-term programmes possible because of the lack of funding, powers and permanency of the existing administrative structures.

4.2 There are few examples of conservation and enhancement projects and some of these are listed here:

- There are a few good examples of sensitive designs at the Seven Sisters Country Park but this has not been copied in widespread fashion elsewhere. There is no area of advertisement control for the whole of the South Downs, just in West Sussex at present.
- Shoreham Cement Works. The Sussex Downs Conservation Board (SDCB) brought together a consortium of interests to come up with a positive vision for the site, located as it is in such a critical position within the South Downs. However, since then a lack of funds or power has prevented the SDCB from moving forward.
- Dutch Elm Disease programme covering Brighton & Hove to Eastbourne is unique, helped by geography, with the sea on one side reducing aerial infection.
- Some Dew Pond restoration has been carried out. It is estimated that approximately 40 dew ponds have been restored (not necessarily all successfully) in the past 15-20 years. Some 400 dew ponds have so far been identified in a SDCB survey currently being undertaken.
- The SDCB has achieved some undergrounding of overhead wires on an ad-hoc basis, such as at Westmeston and A259 Cuckmere Causeway. However, it has been unable to broker an ‘accord’ or agreement with the electricity or telephone companies to prioritise undergrounding of intrusive power lines.
- Redundant buildings – the SDCB has had some success in grasping opportunities but is wholly reliant on external funding or persuasion to achieve success. One example is the removal of an old barn north of the A27 Brighton bypass which was achieved through a planning condition attached to the permission to build a pipeline through the land in question. However, the SDCB was only able to afford to take the building down and remove the asbestos. The reinforced concrete structure remains on site on the ground.

⁷ SDC proof of evidence: Agriculture and Land Management in the South Downs – Inquiry Document No: 3275/42/1

- The SDCB used to have a special fund to tackle large-scale landscape enhancement. Budget cuts saw this lost in 1998, after it had run for only 3 years. However, some restoration projects have been continued through lottery funding although the emphasis has been habitat restoration and less on landscape restoration, such as the Heathland Restoration Scheme.

4.3 Apart from the successes listed above, achieved largely as a result of opportunism, overall there has been no real systematic approach to landscape enhancement across the South Downs. It is clear that the current system is incapable of delivering comprehensive landscape enhancement with the SDCB's sole large scale enhancement programme only lasting for 3 years, some 6 years ago.

5 The role of NPAs in other National Parks

- 5.1 The creation of a South Downs National Park Authority would be enormously beneficial in coordinating and bringing together different sectors and organisations (thinking and budgets) in order to deal with the above problems. Elsewhere, NPAs have been able to create imaginative schemes and strategies which have been successful in starting to tackle some of these complex issues.
- 5.2 As with the dry stone walling programmes of the Peak District and the Yorkshire Dales National Parks the new SDNPA should develop a flint-walling, dry stone walling and hedgelaying restoration programme. The innovative Dales "Barns and Walls" pilot scheme was 25% grant aided by the National Park Authority and the rest through EU and lottery funds. As well as enhancing the landscape, the project was a major success in improving traditional skills and sustaining the local economy⁸.
- 5.3 National Park Authorities are taking steps to deal with activities which impact on tranquility, for instance the Lake District NPA is initiating a speed limit of 10mph on Lake Windermere following the conflict with those seeking quiet enjoyment of the Lake and fast power boating activity⁹, while the Yorkshire Dales NPA in conjunction with North Yorkshire County Council (as highway authority) are introducing experimental restrictions to stop off-road vehicles using the most sensitive unsurfaced vehicular routes¹⁰.
- 5.4 Authorities are also working in close partnership with heritage organisations to survey buildings at risk, undertake archaeological surveys and restore valued but derelict buildings and landmarks, such as the joint Broads Authority/Norfolk Windmills Trust "Land of the Windmills" project which is initially repairing 3 windmills and a steam engine house in the Broads¹¹. In the North York Moors funds have been made available by the Authority for the Staithes Townscape Initiative, repairing and improving a large range of buildings in the town¹². As planning authorities National Parks are also able to use powers and policies to create Conservation Areas or use

⁸ See Appendix A for more information – (attached to this document)

⁹ See Appendix B for more information – (attached to this document)

¹⁰ See Appendix C for more information – (attached to this document)

¹¹ See Appendix D for more information – (attached to this document)

¹² See Appendix E for more information – (attached to this document)

compulsory purchase powers, such as saving the local landmark of Ilam Cross in the Peak District¹³, and can appoint specialist staff such as Historic Buildings Officers.

- 5.5 Park Authorities are also able to turn the tide against small-scale and incremental erosion of landscape character. This can range from robust planning policies to resist excessive lighting and inappropriate clutter, such as the implementation of Areas of Special Control over advertisements in the whole of the Peak District¹⁴, to Management Plan targets such as minimizing the impact of caravan sites on the landscape as in the North Yorks Moors Heritage Coast¹⁵. National Park Authorities have also used their enforcement powers to tackle dumping, flytipping and illegal development, such as Dartmoor National Park Authority's recent prosecution of a waste management company following enforcement action¹⁶.
- 5.6 Enhancement of natural elements of the landscape has not only been achieved through agri-environment schemes but also through pro-active management and restoration of habitats by the Park Authorities themselves and partnerships in the Biodiversity Action Plans for their areas. For instance Exmoor NPA has acquired ancient woodland at Tarr Stepp woods and is engaged in a major heathland and moorland restoration project to help achieve habitat improvements¹⁷. Meanwhile the Broads Authority is actively restoring reed beds and eroded banksides, and is leading an ambitious project to restore the damaged Barton Broad¹⁸. In the Peak District the NPA is a key partner in the Moors for the Future project - a £4.7 million project to restore 300 hectares of damaged moorland¹⁹ while the Vision for Wildlife project is restoring a 35km² area of limestone heath at Longstone Moor SSSI, with the Peak District NPA and English Nature carrying the funding forward²⁰.
- 5.7 The Peak District NPA regularly brings all the relevant telecom operators together in order to reiterate the section 62 duty to respect National Park purposes, and find alternatives to mast proliferation and encourage sensitive design²¹.

6 The benefits a South Downs NPA could bring

- 6.1 In all instances, a major thrust of the SDNPA's work will be working with partners to draw up strategies for inclusion in the NP Management Plan to avoid creating these sorts of problems in the first place and for a rapid response to new issues as they arise. Avoiding problems in the future will be a much more effective use of resources. Prevention is often preferable to cure, as continuously trying to firefight an on-going problem without trying to tackle the root cause could be very expensive in addition to being very difficult to change once done.

¹³ See Appendix F for more information – (attached to this document)

¹⁴ See Appendix G for more information – (attached to this document)

¹⁵ See Appendix H for more information – (attached to this document)

¹⁶ See Appendix I for more information – (attached to this document)

¹⁷ See Appendix J for more information – (attached to this document)

¹⁸ See Appendix K for more information – (attached to this document)

¹⁹ See Appendix L for more information – (attached to this document)

²⁰ See Appendix M for more information – (attached to this document)

²¹ See Appendix N for more information – (attached to this document)

- 6.2 One major benefit of a South Downs National Park will be the resources that will come with its creation and the ability of a SDNPA to draw on resources beyond its core funding. The Sustainable Development Fund operated by Department of Environment, Food and Rural Affairs and Welsh Assembly Government is targeted to the National Parks (and solely so in England) and in the 18 months since inception has supported over 300 projects, providing £200,000 to each English National Park and £250,000 to each Welsh National Park²². Many of the projects outlined in paragraphs 5.2-5.7 have benefited from the SDF, which in turn has drawn in match funding from other sources.
- 6.3 The baseline budget²³ of the SDCB and East Hampshire JAC is less than £2 million in comparison with the budget which has been indicated by the Countryside Agency for the NPA of at least £5.8 million²⁴. The comparative lack of funding for AONBs was a factor in the creation of a National Park Authority for the New Forest, where an AONB Conservation Board option was similarly promoted as an alternative to the National Park/NPA system. In his concluding remarks the inspector found that *“having regard to the national budget for AONBs it would also not have the access to the same level Central Government dedicated to the achievement of the two National Park purposes, including recreation”*.²⁵
- 6.4 Extra resources are not the only reason why a National Park Authority could help enhance the South Downs landscape. The holistic overview of the Park area, the planning powers and the process of the Management Plan which binds the section 62 duty to all relevant stakeholders are all tools in the armoury of a National Park Authority the and missing ingredients in the South Downs at present. Most National Park Authorities do not stop at the production of a Management Plan – these are often accompanied by an Action Plan which sets out a suite of targets to be achieved within the period of the Plan or shorter timescales. State of the Park reports provide the evidence base for the revision of National Park Management Plans and allow progress to be monitored.
- 6.5 The present lack of schemes providing a holistic landscape enhancement is undoubtedly due to the restricted powers and funding available to the Sussex Downs Conservation Board and East Hampshire Joint Advisory Committee.
- 6.6 Finally, the undoubted ability of National Park Authorities to achieve the greatest level of protection and enhancement for the land with which they are charged was recognised recently with a prestigious award. In July 2004 the Landscape Institute’s Award given to National Parks in July 2004 for being the “Greatest Influence on the UK’s Landscape” in the last 75 years.²⁶ It is this proven record and the experience which the South Downs will be able to share with the National Parks family that will provide benefits over and above the existing underfunded and fragmented system.

²² See Appendix O for more information – (attached to this document)

²³ Income from Countryside Agency and local authorities. It does not include money for specific projects from other sources such as the Heritage Lottery Fund or European Union.

²⁴ Paragraph 38 - Inquiry Document No: CD 071.

²⁵ Paragraph 1.236, Page 51, Part 1 of Inspector’s report, New Forest National Park (Designation) Order 2002 – Inquiry Document No: CD 204

²⁶ See Appendix P for more information – (attached to this document)

7 Recommendations

7.1 The South Downs Campaign urges the Inspector to commend the following recommendations to the Secretary of State to assist in the Government's deliberations on the working of the South Downs National Park Authority.

Recommendation 1: *The establishment of a South Downs National Park Authority is especially desirable in order to bring leadership and resources to help galvanise action on landscape enhancement initiatives.*

Recommendation 2: *Landscape enhancement should be a major part of the SDNPA's work programme and this should be recognised when setting budgets.*

Recommendation 3: *In order to achieve significant enhancement of the South Downs landscape the Secretary of State should highlight the importance of those public bodies operating in the area taking their Section 62 duty seriously.*