

**STATEMENT FOR SUBMISSION**

**SOUTH DOWNS NATIONAL PARK INQUIRY 2008**

**TOPIC 6: Western Weald**

**WSCC response to NE Position Paper 6 (1330/0/20) on the  
Management and Funding of National Parks and AONBs**

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**1.0 Qualifications**

1.1 My name is Lisa Creaye-Griffin, I am a Chartered Landscape Architect in the management division and Chartered Surveyor, in the Rural Faculty. I have worked in land management and particularly countryside management and access in the public sector for the last 26 years. My role at West Sussex County Council is Group Manager: Rural Operations, responsible for managing the Countryside Service in the County and promoting activities that help rural communities.

**2.0 Scope of this Evidence**

2.1 The scope of this paper is to respond to Natural England's (NE) Position Paper 6 'Topic 5 AONB Areas' concerning the management and funding of National Parks and AONBs (1330/0/20); to set out how the management of the Western Weald as an AONB already adequately and successfully conserves and enhances the area; and to therefore show that the Western Weald would not suffer from an inferior management system if it were to remain outside of the proposed South Downs National Park (PSDNP).

**3.1.0 The Response to NE's paper: Integrated Management**

3.1.1 NE states (1330/0/20 paragraph 12) that if the Western Weald was part of the National Park it would lead to better integrated management of both the landscape and recreational resource, and bring the AONBs an additional level of inward investment and management focus.

**WSCC Response:**

3.2.1 The area of the Western Weald is a smaller scale, more intimate landscape than the South Downs with views from the greensand hills, across the area. It needs specific management and support to address changes in the way agricultural land is managed and to find

viable use for currently uneconomic woodland in order to help conserve the landscape. Largely an area of livestock farming with some open arable fields, pressure on the economics of this type of agriculture has led to changes in the use of land. Other landscape issues within the area relate to traffic management in villages and the viability to settlements with limited services.

- 3.2.2 This support is being given through the existing South Downs Joint Committee, (SDJC), Local Authorities and other agencies working together; it does not need another layer of bureaucracy to make things happen.
- 3.2.3 This is because the SDJC has been successful in attracting funding from partner organisations and outside bodies and there is no reason to doubt that this would not continue were the Western Weald to be outside of the PSDNP. The SDJC and other AONB's in West Sussex have shown that they can attract investment into the landscape and can work with businesses to help keep the character that attracts business, visitors and residents to the County. An example of this is the Sussex Wealden Greensand Heath Project, the Rother Valley Project, Rother Landcare Project and the West Weald Landscape Project that are all detailed in evidence from Esmond Turner and Sam Howes in their evidence (WSSC 1007/3/1. section 4.3.4)
- 3.2.4 The existing management of the Western Weald area is done on an integrated basis with the emphasis on conserving the landscape and encouraging and managing existing recreation. This is an area of low key recreation which adds to its natural beauty and to the value for the public. I believe that managing the area for National Park purposes, in particular with the demands for increased recreation opportunities would actually conflict with the current ethos of the AONB. As a result, much of the character of the AONB would be lost if included in the PDSNP.

- 3.2.5 The Western Weald is a contrast in both landscape and recreational terms to the South Downs and should remain a contrast to the South Downs. Integrated management with the Downs is not therefore desirable or necessary. Keeping the management for the Western Weald as an AONB would allow a distinction to remain between the two Landscapes without adversely affecting the Western Weald by increasing the numbers of visitors. Hampshire County Council (HCC) in their proof of evidence for Topic 6, (bullet point 5 of paragraph 3.53) make a similar point to NE, that if the Western Weald is part of the National Park it would enable visitors to spread and enable improved awareness and understanding of the landscape. However this is not a good enough reason to incorporate the Western Weald into the PSDNP. If the Western Weald remains an AONB, then people could still spread out into the Weald via the existing trails and rights of way network, and as now, awareness and understanding of the landscape would be part of the AONB units work.
- 3.2.6 There is an emphasis in paragraph 13 of NE's paper on landscapes that are of national importance. The Western Weald is not as well known as the South Downs, which is one of the most recognisable landscapes in the region and as a national, iconic landscape attracts a large number of visitors from outside the region. The Western Weald in contrast is of national importance for its landscape but of local importance for its recreational value, providing an extensive network of rights of way to enjoy with open access on foot to the heathlands.
- 3.2.7 If the Western Weald was to be included in the PSDNP there would be a difference in the degree of promotion of the area and the number of visitors encouraged to come to the Western Weald. I believe that keeping the Western Weald as an AONB would not be detrimental to its level of protection and it is not a prerequisite of continued protection to have an existing AONB incorporated into a new National Park. As stated in WSCC proof on Topic 5 (1007/3/1

para 5.4), there are many examples of AONBs abutting National Parks demonstrating that 'appropriate protection can and should be afforded by different measures'.

#### **4.0 Addressing the Issues of the Western Weald**

4.1.1 In paragraphs 15-19 NE state that AONB status cannot adequately address the range of issues facing the area in the long term, particularly citing planning control.

#### **WSSC Response**

4.2.1 Many of the issues for landscape in this area are not just related to planning but are concerned with changes in the management of agricultural land, woodlands and forests and the management of watercourses. Management of a Western Weald AONB should be focused on practical measures on the ground and influencing policy and strategy without being distracted by a large number of planning applications. There were over 1,450 applications received per year in the West Sussex section of the PSDNP between 1984 and 2000 and a likely increase predicted particularly from the settlement in the Western Weald ( 1881/2/1 para 4.128).

4.2.2 An AONB and a National Park have exactly the same status in planning legislation so the designation will have no legal affect on the protection given to the Western Weald.

4.2.3 All local planning authorities have policies that cover AONBs and have a duty under the Countryside and Rights of Way Act 2000 to have regard to the purpose of conserving and enhancing the natural beauty of the AONB. All local authorities also have a duty to produce a management plan to cover the AONB, a duty that was delegated by those in the Sussex Downs AONB, to the South Downs Joint Committee (SDJC). The SDJC produced such a Plan (CD#26). Once adopted, local authorities would be expected to have regard for it in the way they deliver all their services but particularly those that have and impact on the landscape.

4.2.4 As stated in Chris Cousin's evidence to the previous sessions of the Inquiry (document 1881/2/1), the AONB management body (the SDJC in this case) is consulted on planning policy and its Management Plan is a statutory document. The SDJC issued and adopted the SDJC Planning Guidelines and the effect of this is to encourage all the partner authorities (East Sussex, West Sussex, Hampshire County Councils, East Hampshire District Council, Winchester City Council, Chichester District Council, Horsham DC, Arun DC, Mid Sussex DC, Adur DC, Worthing Borough Council, Lewes DC, Wealden District Council, Eastbourne Borough Council, Brighton and Hove Council, and NE) to refer to these guidelines in making planning decisions in the Sussex Downs AONB and the East Hampshire AONB. This means that the SDJC are consulted as a matter of course on planning applications within the area of their remit and means the SDJC are also left with time and resources to focus on the main issue of conserving the countryside and managing recreation.

## **5.0 Funding**

5.1.1 In paragraphs 20-30, NE look at the funding of AONBs against that of a National Park.

### **WSCC Response**

5.2.1 I respond in detail to the submissions made by NE, below. I have the following general points on funding to make:

- a) It is true to say that National Parks are currently given a more substantial grant which comes direct from Defra and that the formula for that grant is subject to the discretion of the Secretary of State. It is based on £1m per National Park, an element based on a formula and a smaller discretionary element.

- b) The grant for AONBs comes from NE and is set out in the formula as shown in NE's Annex 2 of 1330/0/20.
- c) It is important to highlight that grant funding for both National Parks and AONBs is at the discretion of central government (the Treasury) and therefore any estimates are to be treated with caution. Both forms of grant have in the past few years been subject to reductions.
- d) For example, in 2006/07 the Peak District National Park issued a press release on the reduction in funding from Government and had to find savings of £323,000 to balance the budget. Further funding was then found by Defra.
- e) An extra £3.1 million was put into National Parks over the following two years. This sum is spread across all the National Parks. As the press release attached to NE's Position Paper states, an extra £9.6m extra has been found for National Parks, however this is also spread across three years and all the National Parks. This raises the question, if the SDNP designation is confirmed in this time period, would new funds come forward for the SDNP or would the funds come from this increase?
- f) The largest National Park budget is currently paid to the Peak District, being £7.9 million, of which £2.5 million (31%) is spent on administration and management and £1.2 million (15%) on the planning function. The remaining funding is spent on the ranger service and delivery of other projects on the ground. The Peak District is not the largest National Park but is just a bit smaller than the PSDNP at 1438 square kilometres against 1638 square kilometres and also has a smaller population of 38,000 against approximately 55,587 in the PSDNP. (Figure taken from NE Annex 2, assuming Arundel, Steyning, Lewes, Midhurst and Petersfield are

removed from the National Park). The SDNP budget has been estimated at around £6m (presented in evidence by the Countryside Agency in CD 27), but could reasonably be anticipated to be larger as the formula for the grant from Defra is partly based on population. The question then is will Defra find that extra funding as new money set against all the other priorities that they have.

- 5.2.2 In its proof of evidence, Hampshire County Council (HCC) (1969/1/10 para 3.5) states that including the Western Weald in the National Park would secure an appropriate level of funding for the area's management needs. It does not say what is appropriate or what those needs are. It then goes on to say that the level of funding would not be adequate for its future management again no evidence is offered. I have set out below why I believe the budget of an AONB would be sufficient to run the Western Weald as an AONB.
- 5.2.3 The SDJC has a larger budget than an AONB because of its experimental nature. However it has been an experiment for 16 years now and led to the inclusion of Conservation Boards in the CRoW Act 2000. This strongly suggests that it is not regarded as transient as NE in oral evidence have suggested.
- 5.2.4 The 2007/08 grant for the SDJC was £1.6 million with an actual spend of £2.2 million which was funded by additional external funding. The SDJC in their evidence (PRF 772/1/2 para 7.15) estimate the cost of running the two remnant Western Weald AONBs as £314,730 per annum in total , which includes an element of indirect costs to cover the running of the Headquarters of the SDJC. If the Western Weald were to remain two AONBs , it would be entitled to a grant to its total budget of £244,800 from NE, using NE's formula and assuming that there are two AONBs funded separately. This sum would then be expected to attract Local authority contributions of at least 25 % in addition. Therefore in

total there would be a total budget for both AONBs of £326,400. This would be sufficient to fund the staff on the ground to deliver integrated countryside management and to seek external funding.

- 5.2.5 Local Authorities' budgets are under pressure in the South East because of competing priorities but the value for money gained from funding AONBs is generally good. For example two of the AONBs covering parts of West Sussex attracted last year over £1million in external funding to various projects. These projects included the Sussex Wealden Greensand Heath Project, which is coming to an end now, but much of the habitat has been entered into Environmental Stewardship schemes, which will continue to help fund landowners to manage their land for conservation and access.
- 5.2.6 NE state (para 57 of 1330/0/20) that there is no guarantee that the required level of match funding from local authorities could be achieved or sustained. Local Authority budgets are under pressure but they are often able to provide support in kind, for example to provide a base for the AONB unit and administrative support. This often means that they can provide a more cost effective service that focused on the needs of the area to have people on the ground to provide advice and to take the lead in bringing partners together.
- 5.2.7 In paragraph 52 of Position Paper 6, NE look at the funding for the proposed Western Weald AONB, which I have outlined above. The comparison with the SDNP possible funding of £8m is irrelevant as this is not comparing the same area or administration. The bureaucracy to manage a National Park, especially with planning powers, is considerable. A typical example of a National Park, Exmoor National Park, has 87.6 full time equivalent staff, of which 12 are planning staff. Currently the SDJC has 1.5 people in planning out of its total staff of 45 full time staff. You cannot sensibly compare the size, scale and required funding of a National Park to that of an AONB.

## 6.0 **Integrated Management**

6.1.1 NE talk about the benefits of managing the whole area in an integrated way in paragraphs 31-35 of Position Paper 6.

### **WSSC Response**

6.2.1 This is an interesting point as the Western Weald in West Sussex is managed from the northern area office of the SDJC currently at Midhurst. The boundary of the SDJC Northern area is virtually contiguous with the proposed boundary as set out by West Sussex County Council of the chalk only National Park on its south border, and follows the boundary of the existing AONB for most of the rest of its borders; this is shown on the plan in Appendix 1. This shows that the area can and is managed on a day to day basis as a separate area.

6.2.3 The current management of the Western Weald is tailor made to deal with the specific issues and concerns that are peculiar to the area. The SDJC has management objectives for the area and the first two objectives of the SDJC are similar to those for all AONBs. The second two have been modified to reflect the objectives of national parks rather than AONBs. This is because of the role that the SDJC and its predecessor the Sussex Downs Conservation Board has developed over the years to help to support land-based industries where they can have a significant impact on the landscape. They have also taken on a role in managing access in the AONBs. For example the day to day management of sites and the rights of way network in the Sussex Downs AONB was delegated to the Conservation Board when it was set up.

6.2.4 This highlights the specific requirements of the Western Weald and how they are being currently being successfully dealt with. There is a real possibility that these requirements will get overlooked if the area is to be included with the PSDNP.

## 7.0 **South Downs Management Plan**

7.1.1 NE states in paragraphs 36-38 the importance of the South Downs Management Plan to the PSDNP, which will allow the new National Park and its management to evolve from the existing management. They go on to say that they do not consider that the exclusion of the non-chalk areas from the proposed National Park helps to work towards an evolution of the management (1330/0/20 para. 38).

### **WSCC Response**

7.2.1 The South Downs Management Plan (SDMP) is really only relevant to this inquiry ( paragraph 37) in so far as it is a good example of a partnership between a large number of agencies brought together by the AONB management. It covers the area of the existing AONBs and therefore would show an integration in the management across the Western Weald and the Downs, not because it is necessarily needed to manage the areas but because they are all included in the AONB. If the Western Weald became a separate AONB then those relevant parts of the SDMP could be extracted to form the basis of the Western Weald Management Plan. The fact that the SDMP covers the whole area of the PSDNP does not mean that the whole area should be within the PSDNP.

## 8.0 **Powers of an AONB**

8.1.1 In paragraphs 39-40 NE expresses concern that the new AONB would not have specific powers and duties relating to the promotion and understanding of the special qualities of the area and that the non chalk areas contribute to the recreational and cultural heritage experience for National Park visitors.

### **WSCC Response**

8.2.1 The primary purpose of the designation is to conserve and enhance natural beauty. However in the Countryside Commissions Policy Statement of 1991 and restated in 2001, it states :  
 "In pursuing the primary purpose of designation account should be taken of the needs of agriculture, forestry, other rural industries

and of economic and social needs of the local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.” (AONB A Policy Statement CCP 356 p. 5, 1991 and CCA 24 2001 p.7)

- 8.2.2 Recreation is not an objective of designation, but the demand for recreation should be met as far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.
- 8.2.3 The new AONB would therefore be expected to raise awareness about the special qualities of the area. No AONB unit can function without doing this, there is a need to raise the public understanding of what makes the countryside the way it is. All three AONBs in the County dedicate much of their time and effort to ensuring public understanding of the area. As does the Countryside Service operating outside the AONBs. The three AONBs in the County have events programmes, websites and do outreach work to raise awareness and understanding of their work.
- 8.2.4 NE mention the need to include flatter areas in the National Park to ensure that people of all abilities can gain access (1330/0/20 para. 43) but these areas outside the National Park do not need to be included in the National Park as the area outside would still be an AONB and would provide for the ‘experiential needs’ of visitors. Some of the flattest countryside sites in the County are actually outside the existing Sussex Downs AONB, for example the coastal plain, which is promoted for people with limited mobility.

## 9.0 **Level of Service in the Western Weald AONB**

- 9.1.1 NE in paragraphs 45-48 say that advice and support to landowners and managers is not achievable without a National Park and that

the delegated grant schemes are not as high for AONBs and for National Parks.

**WSCC Response**

9.2.1 This is not so as the County Council already has an advisory service to the AONBs, with lead professionals in landscape, archaeology, historic landscapes, ecology and trees and woodlands. They are supported by rangers, both inside and outside the AONBs on the ground and other agencies who can help landowners. These experts and the rangers are also already working with NE to help target the agri-environment schemes.

9.2.2 In the case of the Western Weald AONB an integrated service could be provide by combining the resources of the Local Authorities, the AONB and other national organisations.

9.2.3 The Sustainable Development Fund, which delivers grants through the AONBs, is separately funded, provided by Defra. It has proved useful in facilitating work and should be retained as it gives value for money. Generally no more than 50 % of funding is given in the form of grant, the rest has to be found by the applicants. Often for local organisations to start a project they only need a small amount of money to pump prime a scheme.

**10.0 Cultural and Natural Heritage**

10.1 In paragraphs 49 and 50, NE set out their belief that because of the natural and cultural heritage in the Western Weald it should be in the National Park.

**WSCC Response**

10.2 There is a wealth of natural and cultural heritage features in the County, outside the proposed National Park and in some cases outside any AONB so this does not appear to be a good argument for including the area. AONBs are able to find funding for projects to work on these features, for example, Chichester Harbour AONB

is just concluding a programme of work called the Rhythm of the Tides that included conservation work on both natural and cultural heritage features.

## 11.0 **Scenarios for Managing the Western Weald**

11.1.1 In paragraphs 61-79, NE sets out alternative scenarios if the Western Weald is excluded from the National Park.

### **WSCC Response**

11.2.1 Three scenarios are set out in NE's paper. It is agreed that although the AONB in East Hampshire would not be the smallest in the country, it would be relatively small and being immediately adjacent to the Western Weald in West Sussex it would not make sense to manage the two as separate AONBs.

11.2.2 The three scenarios are therefore to manage the two remnant AONBs jointly, to merge the two remnant AONBs or to merge the remnant AONBs with the Surrey Hills AONB. I agree with NE's comments on these three options and feel that the most pragmatic solution in the short term is to jointly manage the two AONBs. The longer term solution would be to re-designate the two as one AONB and consider the inclusion of other areas of the Western Weald.

11.2.3 Managing the Western Weald as two separate AONBs would provide the AONB management with a reasonable grant as outlined above and enable a relatively simple process to establish a new base for the AONB using one of the existing two bases of the SDJC. This would give economies of scale, particularly for Hampshire where the remnant AONB is relatively small, although would not be the smallest AONB (the Isles of Scilly are the smallest at 16 square kilometres). There may be some synergy to be had with working with the Surrey Hills on some projects but the Surrey Hills is a large AONB that spreads across the County and has gaps that exclude Guildford. The section that abuts West

Sussex is therefore a relatively remote part of the AONB. There is therefore no real benefit currently to be had from merging with the Surrey Hills unless that proves to be a way of attracting more external funding in the future.

## 12.0 **Conclusion**

12.1 In conclusion the Western Weald is a landscape of national importance which is being successfully managed and enhanced as an AONB. As set out above I consider that it could successfully be managed as a separate AONB along with the remnant section in East Hampshire. The Western Weald would still be promoted for recreation as it is now but that recreation would mainly be low key and principally promoted to local visitors. The current management and funding arrangements for the existing AONBs are successful and well established. The case has not been convincingly made that if the Western Weald is to be outside the SDNP, its funding will suffer to an extent that its future protection will be threatened. I do not therefore consider that it would be "especially desirable" to incorporate the Weald with a proposed SDNP, notwithstanding any debate about whether that land meets the natural beauty and recreation criteria that are necessary for designation.