Draft letter to the Countryside Agency

Mr E Cameron,

Chairman

Countryside Agency

A South Downs National Park Public Consultation

PO Box 33299

LONDON SW1H OWF

Dear Mr Cameron,

A South Downs National Park – Response to public consultation

Eastbourne Borough Council welcomes the opportunity to make representations on the Countryside Agency's proposals for a new national park covering the South Downs. It is gratifying to know that the Government thinks so highly of the South Downs landscape that it is willing to consider devoting extra resources to maintain and enhance the quality of the area.

As you are aware the local authorities in Sussex and the Countryside Agency initiated the Sussex Downs Conservation Board in 1992 in order to provide additional resources to protect and enhance this unique high quality landscape. The Board has made a significant contribution to enhanced management of the Downs whilst encouraging it as a living and working area. The Board has had a strong influence on the planning process from the policies contained in the structure plans, local plans and other documents to the outcome of determining individual planning applications. The Board and local authorities have worked well together and created real added value.

The designation of the South Downs as a National Park would replace the Conservation Board with a new tier of Government overlapping with 15 locally elected County, Unitary, District and Borough Authorities. The National Park would contain no directly elected members but rather those appointed by the local authorities and the Secretary of State. This diluting of political accountability is a major concern to local authorities in particular. There would be a democratic deficit.

Since 1999 when the Government announced its wish to investigate the suitability of establishing a South Downs National Park Eastbourne Borough Council has worked closely with other local authorities to investigate whether a new management body for the South Downs might further improve on present arrangements. It is fundamentally important that the solution is appropriate to the 21st Century and recognises the special character of the area. It

is the strong belief of local authorities that the special character of the area demands a tailor-made solution that requires new primary legislation.

The main issues and concerns continue to focus on three areas:

What benefits will National Park status bring?

Where should the boundary be drawn?

Should planning powers rest solely with a National Park Authority?

If a National Park is to be more than just a further level of bureaucracy then it needs to demonstrate real added value. It has been assumed that the Government would guarantee a marked improvement in resourcing which cannot be afforded by the present arrangements of the Conservation Board. Local authorities are still unclear what will be available. Our Council and others would wish to see what the draft budgets could be for the National Park for its first three-year period. This amount also needs to be broken down to shown (a) the likely new funding available for providing improvements and (b) the cost of administration. It is important that efficient and effective use of resources is achieved and that a marked improvement in outputs is actually achieved.

The boundary of the proposed National Park will be a matter of interest to many individuals and organisations not least because of the general implications and impact of being within or outside the National Park. My Council has made a number of suggested changes in the attached papers.

It is essential that urgently needed transport infrastructure in East Sussex is updated to meet current and future demands. This is particularly in respect of improvements to the A27 east of Lewes and the south coast railway line throughout East Sussex. There is a concern that the National Park designation will detrimentally affect the prospects of such essential improvements to the transport infrastructure. The future economic prosperity of Eastbourne and much of East Sussex is dependent on ensuring that transport infrastructure is significantly improved. Assurances are therefore sought on this matter.

Planning land use and transport are crucial to the quality of life and the present Area of Outstanding Natural Beauty has the same level of protection against inappropriate development as a National Park. The directly elected and locally based councillors carry out the responsibilities at present. They are accountable to the local electorate through the ballot box. Evidence suggests that local councillors have exercised their responsibilities with considerable sensitivity and have an excellent track record in protecting the Downs from harmful development. It is therefore of major concern that such responsibilities could be transferred from elected councillors to people who are accountable to a body made up of appointees. Where is the acknowledgement of the previous excellent record? Surely a transfer back to local authorities with some special call in mechanism for a National Park Authority would be an acknowledgement of trust and true partnership by the Countryside Agency and the Government. This would build on sound existing arrangements, which are working well. This would satisfy the national agenda from Government whilst retaining directly elected decision making at a local level.

I have also attached the formal responses of my Council to the questions set out by the

Agency. If you wish to clarify any of the matters raised do not hesitate to contact me.

Yours sincerely,

Councillor Graham Marsden

Leader of the Council