

COMMITTEE:	CABINET
DATE:	1 August 2002
SUBJECT:	South Downs National Park Council's Response to Formal Consultation
REPORT OF:	Director of Tourism & Leisure and Director of Planning, Regeneration and Amenities
Wards:	Meads, Downside and Upperton
Purpose:	To report to members on the formal consultations being undertaken by the Countryside Agency on the proposed South Downs National Park and to recommend a further response.

Contact:	Jefferson Collard, Acting Head of Planning - (Telephone 01323 415252). Mike Smith, Downland, Trees and Woodland Manager – (Telephone 01323 415273).
Recommendations:	That following the Countryside Agency's public consultation and subsequent recommendations , Cabinet approve the proposed formal response on the South Downs National Park Boundary and preferred Administrative arrangements, as detailed in Appendix 3.
1.0	<u>Introduction.</u>
1.1	The Countryside Agency (CA) carried out a public consultation between November 2001 and February 2002, on the details for the South Downs National Park. A report on the public consultation was debated by Cabinet on 6 February 2002.
1.2	After considering over 6500 written submissions, the CA has produced a Report (May 2002) outlining their preferred draft boundary and administration for the proposed new Park Authority.
1.3	The report, which has been individually circulated to all members, outlines what the board are proposing to advise the Government. As required by the National Parks and Access to the Countryside Act 1949, they now invite County, Unitary, District, Borough also Town and Parish Councils, with land affected by the proposal to give their views about the boundary and administrative arrangements as set out in the document.

1.4	This phase of the consultation process will finish on 16 August 2002. The CA will then consider the responses to the consultation and decide what area should be designated a National Park. They will also consider and recommend to the Secretary of State for the Department of the Environment, Food and Rural Affairs (DEFRA), their preferred administrative arrangements for the National Park. This is programmed for November 2002. A formal Designation Order will then be placed on deposit for people to make representation in support of, or objections to the proposals.	
2.0	<u>A South Downs National Park – Formal Consultation Document.</u>	
2.1	Appendix 1 shows the response from Eastbourne Borough Council to the previous Public consultation, as authorised by Cabinet on 6 February 2002. Members must now revisit the issues and amend the Borough Council's responses, if required.	
2.2	Issue 1: Membership of a South Downs National Park.	
2.2.1	The CA had previously recommended a full National Park Authority with 46 members as the best solution because all local authorities would be involved and engaged in the process with town and parish Councils' interests maintained.	
2.2.2	Following the public consultation, the CA now proposes to advise that the Secretary of State establishes a South Downs National Park Authority under the 1995 Act. To decide the number of seats for local authorities, he should discuss with them, ways of reducing the overall numbers. This could be achieved by the County Councils, having fewer seats or by smaller Local Authorities 'sharing' a seat.	
2.2.3	Recommended response to membership of South Downs National Park That Eastbourne Borough Council would want a National Park Authority which allowed them at least one seat on the board.	
2.2.4	Parish Membership.	
2.2.5	The CA previously recommended that there should be a locally agreed democratic process for the selection of parish members.	

2.2.6	Following the public consultation, the CA now proposes to advise that the Secretary of State should define the characteristics sought and work with local parishes to agree an open and democratic process for the selection of members.	
2.2.7	Recommended response to Parish Membership: The approach advised by the CA for the selection of parish membership is acceptable.	
2.2.8	Creating a skilled administration.	
2.2.9	The CA previously recommended that their preferred option was to keep the present proportions of individuals and councillors i.e. 12:34, but to give more guidance to local authorities and the Secretary of State as to the best balance of interests and expertise for authority membership.	
2.2.10	Following the public consultation, the CA proposes to advise the Secretary of State that when appointing members, the new Park Authority should look at appointing people with a wide range of skills, including: arable and livestock farming, tourism, education, transport, recreation, soil and water management and sustainable development. The CA will also advise that all members should sign a code of conduct and take part in ongoing training.	
2.2.11	Recommended response to creating a skilled administration: Eastbourne Borough Council agree that in appointing members, a wide range of skills to achieve a balance of interest should be sought. We would hope that it is still intended to keep the same proportion of individuals to councillors as previously recommended and would agree that a code of conduct and ongoing training is essential.	
2.3	Issue 2: A role in forward Planning and Development Control.	
2.3.1	Structure Plans.	

2.3.2	<p>The CA, in their original consultation, proposed that joint structure plans would be prepared with the affected County Councils. This would allow seamless strategic policy coverage with the area adjoining the proposed National Park. This Authority supported this approach. This is no longer the preferred option. It is now proposed to prepare a Unitary Development Plan (UDP) and only voluntary joint working with neighbouring structure plan authorities.</p>	
2.3.3	<p>This significant change probably reflects the recent proposals issued for consultation by the Government on changes to the planning system. This proposed a shift of emphasis away from structure plans to regional plans. There has been no formal response from the Government on the outcome of that consultation and the CA accept that they need to work with the current planning system in advising DEFRA of their proposed administrative arrangements.</p>	
2.3.4	<p>The UDP option is a regrettable choice as it is likely to lead to a less well-integrated plan with only voluntary involvement of the Structure Plan Authorities. Currently, District and Borough Councils have input into the relevant structure plan preparation covering their area because of the need for the local plan to be in conformity with it. In the case of a UDP, there is no effective overlap with the adjoining District and Boroughs as the boundaries are contiguous. Consequently, the Borough and Districts will have less influence on the UDP.</p>	
2.3.5	<p>The reason the CA give for not preferring joint structure planning is that the system would be “very difficult to put into practice and may be too cumbersome to be workable”. This could also be the case with voluntary joint working, and there would be little reason to make it work unless it was formally recognised.</p>	
2.3.6	<p>The preparation of a UDP across 3 counties may well lead to an isolated plan that will not be properly co-ordinated or integrated with the surrounding area.</p>	

2.3.7	<p>Recommended response to Structure Planning: This Authority would prefer the new Park Authority to have formalised joint working with the relevant Structure Plan Authorities. The Authority is disappointed that the CA has not chosen to advise DEFRA that the new Park Authority should work more formally on a joint structure plan, with the Authorities affected. A voluntary agreement on co-operation and consultation is not sufficient to safeguard the interests of the wider area. The proposal for a Unitary Development Plan means that the park will be strategically truncated from its surroundings. The National Park will effectively be operating on its own, with only voluntary arrangements to work with or consult its neighbouring authorities.</p>	
2.3.8	<p>Minerals and Waste Local Plans.</p>	
2.3.9	<p>This Authority's preferred approach was to have joint working with the existing Authorities who are responsible for Waste and Mineral Local Plans. The CA would prefer a single Local Plan, covering the new park for these two functions. Whilst this may be acceptable for mineral planning, Waste Local Plans are, and need to be, generally more integrated with the surrounding area.</p>	
2.3.10	<p>Recommended response to Waste Planning: This Authority would prefer to see joint working with the existing Waste Authorities: East Sussex County Council and Brighton and Hove City Council; West Sussex; Hampshire County Council, Southampton City Council and Portsmouth City Council.</p>	
2.3.11	<p>Local Plans.</p>	
2.3.12	<p>This Authority accepted that the most efficient and consistent approach to the method of preparing local guidance for the new National Park, is a single parkwide Local Plan. This remains the preferred approach of the CA.</p>	
2.3.13	<p>If the eventual strategic planning for the National Park were by a UDP, then the Local Plan would fit into this format as Part 2 of the UDP.</p>	

2.3.14	Recommended response to Local Plans: The CA approach is acceptable.	
2.3.15	Development Control:	
2.3.16	This Authority's preferred approach was for legislation to allow the transfer of development control powers from the Park Authority back to local authorities. The CA prefers the new Park Authority to retain the Development Control function. However, they accept that some delegation of the function back to Local Authorities may be desirable and are seeking advice from the Secretary of State on the most effective way this could be achieved.	
2.3.17	This Authority usually has only one or two applications on the Downland each year. However, in the wider context of other local authorities, the number of applications will be significant. These authorities have significant expertise in development control and have local members accountable to their electorate. It is important that this accountable expertise is recognised by the new Park Authority when drawing up their arrangements for handling the development control paperwork.	
2.3.18	Recommended response to the Development Control function: The Borough Council is disappointed that the CA are not recommending a transfer of the Development Control function to the Local Authorities, but would accept the delegation of the function back to its own officers and members. In the latter instance, the local authority staff could then make presentations to the National Park Committee on major or contentious applications as well as those recommended against adopted policy.	
2.4	Issue 3: A role in land management.	
2.4.1	The CA previously recommended that how the land is managed is critical to conserving the unique landscape and natural beauty of the South Downs.	
2.4.2	A new Park Authority would need to work closely with those who manage land and also provide clear procedures for discussing and acting upon farming and forestry, nature conservation and cultural heritage issues.	

2.4.3	Following the public consultation, the CA proposes that a National Park Authority for the South Downs must give special priority to enhancement of the countryside and that resources should be made available to enable them to pursue restoration of chalk downland and other habitats, in partnership with those who own and manage them, through integrated rural development initiatives.	
2.4.4	The Park Authority would also play a lead role in biodiversity action plans and play an active role in conserving the cultural heritage.	
2.4.5	Many responses commented on the inclusion of the marine conservation area around Seven Sisters, including Beachy Head and The Pound in Eastbourne. It is only possible to extend the park boundary to the low water mark, but the CA proposes that the Park Authority should work closely with other bodies with statutory responsibilities to provide an integrated coastal zone management plan.	
2.4.6	Recommended response concerning land management: The Borough Council generally support this approach, provided the conservation of the landscape is not at the expense of the social and economic well being of the area. It is also essential that adequate resources are identified to ensure satisfactory landscape conservation and restoration, sustainable farming and woodland management. The Borough Council support the strengthening of the marine conservation area status and voluntary codes of conduct into an integrated management plan.	
2.5	Issue 4: A role in visitor management.	
2.5.1	The CA previously recommended that the new Park Authority would provide a fully integrated area based countryside management service. They would also develop a framework that comes with high standards of management.	
2.5.2	They could manage on behalf of a local authority and owners, or support existing countryside management services. Land ownership was also considered where this was the most effective way to create public access.	

2.5.3	<p>Following the public consultation, the CA proposes that a new South Downs Park Authority should run its own countryside management service, co-ordinating and adding value to existing area/county based services. They would also play a strategic role in site management by developing a framework that ensures high standards and they would take on land where a benefit could be demonstrated.</p>	
2.5.4	<p>Recommended response concerning visitor management: Eastbourne Borough Council would welcome the added value a Park Authority Ranger Service would bring to our existing countryside management service.</p>	
2.5.5	<p>Rights of Way.</p>	
2.5.6	<p>With reference to management of access and rights of way, the CA previously recommended that they have responsibility delegated to them by the Highway Authority. This option allowed the new Park Authority to be responsible for:</p>	
	§	making orders altering public rights of way;
	§	in maintaining the rights of way network;
	§	producing and implementing a rights of way improvement plan.
	<p>This work is currently carried out by the Sussex Downs Conservation Board and East Sussex County Council.</p>	
2.5.7	<p>Following the public consultation the CA proposes that a South Downs National Park Authority should prepare a comprehensive access strategy, addressing access to open countryside and rights of way improvements, management and maintenance standards.</p>	
2.5.8	<p>They are also proposing that the Secretary of State should advise the highway authorities to delegate all rights of way powers to the Park Authority which would then work closely with the Highway Authorities to agree the most efficient way of carrying out this function.</p>	

2.5.9	<p>Recommended response to the CA proposal concerning rights of way: Eastbourne Borough Council would agree that the management of access and rights of way should be delegated to the new Park Authority, however, the extent of the delegation should be decided by the County Councils, working closely with the Park Authority to achieve a working partnership that is properly resourced.</p>	
2.5.10	<p>Transport.</p>	
2.5.11	<p>The CA previously recommended that the new Park Authority should play an active role in preparing local transport plans, working jointly with authorities on policies that have impact on the area and implement transport policies on behalf of the Highway Authority through delegated powers, and that the Highway Authority should provide resources (including funding).</p>	
2.5.12	<p>Following the public consultation, the CA proposes to advise that the new Park Authority should take the lead in preparing a Transport Strategy which would inform transport policies and determine the content of Local Transport Plans. They are also proposing that a new Park Authority should deliver parts of the Transport Strategy/Plan but they have stated that this would be carried out using its own powers and resources or on behalf of highway authorities.</p>	
2.5.13	<p>Recommended response concerning transport: The approach proposed by the Agency is considered to be generally acceptable. However in respect of delivering parts of the transport strategy and implementing transport policy it is assumed that the park authority would not directly institute highway works because of their likely lack of expertise. The park authority should also not extend or supersede the area highway authorities areas of responsibility for highway infrastructure, which would include roads and footpaths. Therefore, the Park Authority should work in partnership with the Highway Authority. The Borough Council is also concerned that any new arrangements should be properly resourced and funded.</p>	
2.5.14	<p>Tourism.</p>	

2.5.15	The CA previously stated that the new Park Authority would not be the tourist authority for the area or promote the South Downs to tourists.	
2.5.16	They would work closely with those who do cater for visitors and the tourist authorities in preparing a tourism strategy to ensure that it does not conflict with National Park purposes.	
2.5.17	Following the public consultation, the CA now proposes to advise that a South Downs National Park Authority should prepare a joint tourism strategy with the tourist authorities and take an active role in the promotion and support of sustainable tourism.	
2.5.18	Recommended response concerning tourism: The Borough Council welcomes the CA's proposed advice to DEFRA that they will prepare a joint tourism strategy and an active role in promotion and support of sustainable tourism. The Borough Council would wish to be directly involved in the development of the Strategy and suggests that the South & South East England Tourist Boards' Officers Forums are used for this purpose.	
2.5.19	Education & Interpretation.	
2.5.20	The CA previously recommended that a National Park Authority should develop and co-ordinate the area's interpretation, agree with local authorities and others an agreed interpretative strategy, promote community visitor information sites and develop local outreach programmes to encourage use of the Downs by schools and groups of young people.	
2.5.2	Following the public consultation, the CA proposes to advise that a South Downs National Park Authority should develop and co-ordinate interpretation of a National Park. It should agree a shared interpretative strategy for publicly owned sites and develop an outreach programme for the variety of communities inside and outside its boundaries.	
2.5.22	Recommended response concerning education and interpretation: The Borough Council considers the approach proposed by the CA is acceptable	
2.6	Issue 5: A National Park Management Plan.	

2.6.1	<p>The CA previously recommended that, under the Environment Act 1995, each National Park Authority is required to prepare and publish a National Park Management Plan which acts as an umbrella document for the authorities' work. These plans are subject to a wide consultation during their preparation and involve individuals as well as local and national organisations.</p>	
2.6.2	<p>Following the public consultation, the CA proposes to advise that, depending on the outcome of the National Park's review, the Secretary of State might clarify the role of a South Downs National Park Management Plan in establishing co-ordination and implementation of</p> <p>the policy and programmes of a National Park Authority and other bodies. Progress should be reviewed against annual targets and reported publicly. It is also proposed that public bodies should incorporate in their own business plans a clear statement of how they will fulfil their duty to take account of National Park purposes.</p>	
2.6.3	<p>Recommended response concerning a Park Management Plan: The Borough Council agrees in principle with the CA proposal but would like to be consulted on the detail of how the Council's plans and policies are to be integrated with the Park Authorities' proposal.</p>	
2.7	<p>Issue 6: Working in partnership.</p>	
2.7.1	<p>The CA previously recommended that to achieve National Park purposes, a Park Authority would need to work closely with Local Authorities and with statutory and voluntary bodies.</p>	
2.7.2	<p>Following the public consultation, the CA proposes that a priority for a South Downs Park Authority is to forge strategic partnerships and that a National Park Authority should also seek a place for its members on the relevant committees of other bodies, notably the South East England Regional Authority.</p>	
2.7.3	<p>Recommended response concerning working in partnership: That Eastbourne Borough Council supports the need for close partnerships between the Park Authority and other bodies and that the Park Authority builds on the close working partnerships already established with the South Downs Conservation Board.</p>	

2.8	Issue 7: Involving Local People.		
2.8.1	The CA previously recommended that the new Park Authority will need to consult its local communities and visitors to take into account the wide range of interests. A Park Authority would also wish to contribute to the development and implementation of community strategies which local authorities now have a duty to produce. This could then be reflected in their own work.		
2.8.2	They also believe that a Park Authority should put in place arrangements that would actively involve local people which would include holding a forum or general meeting at least once a year, organising public consultation events when deciding impartial issues, creating partnerships with users and community groups to develop increased understanding of the special characteristics and conservative needs of a National Park.		
2.8.3	Following the public consultation, the CA proposes that a South Downs National Park Authority should put in place, arrangements that will actively involve local people. It should also draw on the aspirations of community strategies and local strategic partnerships in its work.		
2.8.4	Recommended response concerning involving local people: The Borough Council welcomes the involvement of local people in the visions of the Park Authority and would support the Park Authorities involvement with the Eastbourne Strategic Partnership and the preparation of a Community Strategy.		
2.9	The Proposed Boundary.		
2.9.1	The Borough Council's previous response to the draft boundary proposal by the CA stated that it was generally considered acceptable within Eastbourne Borough but that we would wish to include three additions:		
	§	a field on the northern end of Chalk Farm near Wannock;	
	§	open land west of The Combe, Ratton:	

	§	land south of Pashley Down School accessed off Longland Road.	
		We also recommended that outside Eastbourne, the southern side of the A27 should be used as the proposed National Park boundary between Polegate and the road access to Glynde with inclusions and exclusions on the Firlie straight to provide a clear, logical boundary.	
2.9.2		Following the public consultations, the CA have included the three areas within Eastbourne as well as the changes on the A27 as recommended.	
2.9.3		It has recently come to light that an additional area of land that is outside the built-up area boundary has not been included within the proposed National Park. The area is (shown in Appendix 2) located between East Dean Road and Upland Road, just to the west of Ridgeland Close. This is at the lower end of a downland meadow which is public access land owned by the Borough Council. Although the area in Appendix 2 is private and fenced, there is still remnant downland habitat and it is felt that it meets the criteria for inclusion and protection within the National Park boundary.	
2.9.4		Response to boundary issue: That the Borough Council supports the current boundary in Eastbourne but would recommend inclusion of the area shown in Appendix 2 within the South Downs National Park boundary.	
3.0		<u>Consultations</u>	
3.1		No external consultations were undertaken.	
4.0		<u>Implications</u>	

4.1	<p>Human Resource:</p> <p>The designation of a South Downs National Park would have minimal resource implications on Eastbourne Borough Council. It would in fact reinforce and support the works of the Downland Team through its Ranger service providing an additional labour and interpretation resource when needed for projects as well as general countryside management issues.</p>	
4.2	<p>Environmental:</p> <p>National Park status is a designation equivalent to the current ANOB and would not dilute the high standard already achieved by Eastbourne Borough Council. It would not cancel out any current agreements with DEFRA or English Nature and may even amalgamate all the different grant providers into one co-ordinated group for any future grant applications.</p>	
4.3	<p>Financial:</p> <p>The financing for the National Park is covered by central Government, with 75% of the cost going directly to the Park Authority. The remaining 25% is paid via the local authority, ring fenced within the Standard Spending Assessment. This means that in practice there are no additional costs locally. Further partnership funding may be possible for management, interpretation and investment on Eastbourne Downland.</p> <p>The Council would make an annual saving of £10,000.00, as the annual payment to the Sussex Downs Conservation Board would no longer be required once the Park Authority takes over.</p>	
4.4	<p>Youth/Anti Poverty/Community Safety/Human Rights</p> <p>None</p>	
5.0	<p><u>Summary</u></p>	
5.1	<p>The Countryside Agency is undertaking a local authority consultation on its preferred administrative arrangements and boundary for the proposed South Downs National Park. It is recommended that Cabinet approve the proposed response to the boundary and administration issues explained in this report and laid out in the letter to the Countryside Agency in Appendix 3.</p>	

Authors: Jefferson F Collard : Acting Head of Planning		
Mike Smith: Downland Trees and Woodland Manager		
Background Papers:		
The Background Papers used in compiling this report were as follows:		
i)	Minutes of Cabinet 6 February 2002	
ii)	A South Down National Park: Local Authority Consultation: Countryside Agency May 2002.	
To inspect or obtain copies of background papers please refer to the contact officer listed above.		

Mr E Cameron,

Chairman

Countryside Agency

A South Downs National Park Public Consultation

PO Box 33299

LONDON SW1H 0WF

12 February 2002

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 show (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

Eastbourne Borough Council response to the administrative issues and questions posed by the Countryside Agency in respect of the South Downs National Park consultation:

Issue 1. Membership of a South Downs National Park Authority

1A. Is the Agency's preferred option the right one for the South Downs?

Do you think the other option would be a better way forward, or are there any other options the Countryside Agency should consider?

	Eastbourne Borough Council (B.C.) response to membership of South Downs National Park question 1A: That the Council would want a full National Park Authority with local authorities representing over half of the membership to reflect their democratically elected status.

1B. How do you think Parish members should be selected?

	Eastbourne B.C. response to question 1B: The approach suggested by the Countryside Agency for selecting parish members is accepted.

1C. What are your views on the Countryside Agency's preferred option to ensure appropriate expertise is appointed to the Authority?

Do the areas of knowledge and expertise set out cover the issues that affect the Downs?

1D. Do you believe that mechanisms such as training and a code of conduct for members should be used to ensure that the National Park Authority is properly skilled?

1E. What are your views on the other option? Are there any other options the Agency should consider?

	<p>Eastbourne B.C. response to creating a skilled administration questions 1C/1D/1E: The approach suggested by the Countryside Agency for required knowledge and experience and induction, training and code of practice for members are accepted. The approach suggested by the Countryside Agency i.e. option A – present proportion - for appointment of representatives is accepted.</p>
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Issue 2. A role in forward planning and development control.

2A. What are your views on the Countryside Agency's preferred option for a South Downs National Park Authority to prepare joint structure plans?

2B. Do you think one of the other options would be a better way forward, or are there other options the Countryside Agency should consider?

	<p>Eastbourne B.C. response to questions 2A/2B : The approach suggested by the Countryside Agency i.e. option A –joint structure plans – is considered to be the most acceptable of the options given. It is also expected that District/Borough Council’s will have a close involvement in helping to develop the strategic policies.</p>
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2C. What are your views on the Agency's preferred option for joint minerals and waste local plans?

2D. Do you think one of the other options would be a better way forward, or are there other options the Agency should consider?

	<p>Eastbourne B.C. response to questions 2C/2D: The approach suggested by the Countryside Agency i.e. option A –minerals and waste local plans prepared jointly – is considered to be the most acceptable of the options given. It is also expected that District/Borough Council’s will have a close involvement in helping to develop the strategic policies.</p>
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2E. What are your views on the Countryside Agency's preferred option for a South Downs National Park Authority to prepare a park-wide local plan, working in conjunction with constituent and neighbouring local authorities?

2F. Do you think one of the other options would be a better way forward, or are there other options the Countryside Agency should consider?

	<p>Eastbourne B.C. response to questions 2E/2F: Option A is considered to be the most efficient and consistent method of preparing local plan guidance for the proposed national park. However, it is considered essential that all District/Borough Councils have membership of an officer working party and a Councillor panel developing a park-wide local plan. The Districts and Boroughs need to have a significant involvement in policy formulation because of cross-boundary issues.</p>

2G. Do you think that a unitary development plan would be the best model for the South Downs?

	<p>Eastbourne B.C. response to question 2G: A single unitary plan approach is not considered acceptable because it would not bring the advantages that result from joint planning. It is also likely to be too major an exercise to achieve in a reasonable timetable and could be very resource hungry during certain parts of the process.</p>

2H. What are your views on the Countryside Agency's preferred option to delegate some development control responsibilities to existing local authorities?

What are your views on the degree of delegation that would be appropriate?

2I. Do you think one of the other options would be better, or are there any other options the Countryside Agency should consider?

	<p>Eastbourne B.C. response to questions 2H/2I: A transfer of development control powers back to local authorities is the preferred option. Local authorities have the professional expertise in terms of qualified staff with local knowledge, to be able to process planning applications in the most efficient and effective manner having regard to public consultation and other material planning implications. Local authorities have for many years provided a good quality service in determining planning applications. Therefore, new legislation is considered necessary to allow for this option. The local authorities would be able to consult with the park authority and keep them informed of progress in determining applications. The park authority would be informed of recommendations in advance of decisions being taken. This would allow a representative of the park authority to make a presentation to a local authority planning committee if it wished to oppose a recommendation made. The park authority would have the option to request that the application be called in by the Secretary of State.</p>

Issue 3. A role in land management

3A. What are your views on the proposed role for a South Downs National Park Authority in relation to farming and forestry, nature conservation and cultural heritage? Do you agree that restoration of downland should be a particular priority?

3B. Are there any other land management matters that a South Downs National Park would need expertise to address?

	<p>Eastbourne B.C. response to questions 3A/3B: If a Park Authority is created for the South Downs one of its major tasks would be to conserve the unique landscape and natural beauty of the area. However, this should not be at a cost to the social and economic wellbeing of the area. It is considered essential that adequate resources are identified to ensure satisfactory landscape conservation and restoration, sustainable farming and good woodland management.</p>

Issue 4. A role in visitor management

4A. Do you think that a South Downs National Park Authority should run its own integrated and area-based countryside management service?

Are there other options that the Agency should consider?

4B. What do you think a South Downs National Park Authority's role should be in relation to site

management and ownership?

	Eastbourne B.C. response to questions 4A/4B: A park authority should provide a fully integrated, area - based countryside management service. Such an authority should develop common high standards for the management of publicly owned land and it could either manage sites on behalf of local authorities or private owners, or work in partnership. A park authority should be able to own land where this is the most effective way to create new public access.

4C. What are your views on the Countryside Agency's preferred option for highway authorities to delegate right of way powers to a South Downs National Park Authority?

What activities do you think the National Park Authority should be responsible for?

4D. What are your views on the other options, or are there any other options that the Agency should consider?

	Eastbourne B.C. response to questions 4C/4D concerning rights of way: Option A, rights of way responsibilities delegated by highway authorities to the proposed park authority, is considered to be the best option provided that it is adequately resourced.

4E. Do you agree that the National Park Authority should have an active role in transport and traffic management?

Are there other issues that the Countryside Agency should consider?

	Eastbourne B.C. response to question 4E concerning transport: The approach proposed by the Agency is considered to be generally acceptable. However in respect of delivering parts of the transport strategy and implementing transport policy it is assumed that the park authority would not directly institute highway works because of their likely lack of expertise. The park authority should also not extend or supersede the area highway authorities areas of responsibility for highway infrastructure, which would include roads and footpaths.

4F. Do you agree with the role outlined for the National Park Authority on tourism?

Are there other issues that the Countryside Agency should consider?

	Eastbourne B.C. response to question 4F concerning tourism: The Council is disappointed that the tourism proposal is so weak given that one of the two statutory purposes of a National Park Authority is to promote opportunity for the public to understand and enjoy a national park. It is understood that other national parks take a more active role in the area of tourism. It needs to be acknowledged that the designation of the National Park will generate more tourism business because it will be used as a marketing tool to encourage visitors to come to the area. Therefore, it is considered vital that a park authority has a stronger role in tourism promotion, including appropriate staff and financial resources to enable it to work effectively with tourist authorities such as the Borough Council.

4G. Do you agree with the role outlined for the National Park Authority on education and interpretation?

Are there other issues that the Countryside Agency should consider?

	Eastbourne B.C. response to question 4G concerning education and interpretation: The approach proposed by the Agency is considered acceptable.

Issue 5. A National Park management plan and delivery by the National Park Authority and others

5A. What are your views on the role of the National Park Authority in co-ordinating and monitoring action by others?

Are there other issues that the Countryside Agency should consider?

	Eastbourne B.C. response to question 5A concerning a park management plan: The approach proposed by the Agency is considered acceptable.

Issue 6. Working in partnership

6A. What are your views on involving other parties through joint working in order to support the work of a South Downs National Park Authority?

Are there other issues that the Countryside Agency should consider?

	Eastbourne B.C. response to question 6A: The approach proposed by the Agency is considered acceptable.

Issue 7. Involving local people

7A. What are your views on how a South Downs National Park Authority might involve local people?

Are there other issues that the Countryside Agency should consider?

	Eastbourne B.C. response to question 7A: The approach proposed by the Agency is considered acceptable.
	Eastbourne B.C. response to boundary issue: The proposed boundary is generally considered acceptable within Eastbourne Borough although three further additions are recommended (see attached maps): a field on the northern end of Chalk Farm near Wannock; open land west of the Combe; and south of Pashley Down School accessed off Longland Road. In addition, the Voluntary Marine Conservation Area running along the coast should be included within the proposed area. Outside Eastbourne the southern side of the A27 should be used as the proposed National Park boundary between Polegate and road access to Glynde and changes are recommended on the Firle Straight (see attached maps). This would provide a clear logical boundary. It is important that the need for possible future improvements to the main railway line and the A27 are not frustrated by a National Park designation and assurances are sought.

Ref: JFC/TP7/5

A South Downs National Park

Statutory Consultations

P O Box 33299

LONDON

SW1H 0WF

1 August 2002

Dear Sirs

A South Downs National Park – Local Authority Consultation

The consultation document, “A South Downs National Park: Local Authority Consultation” was debated at Cabinet on 1 August 2002. I enclose a copy of the Committee Report for your information.

Thank you for giving this Authority the opportunity to comment on your draft boundary and preferred proposals for the administrative arrangements of the proposed National Park. This Authority is able to support the draft boundary with one minor addition. We are also able to support many of your proposals for the administration of the New Park Authority. However, we also have some concerns.

Our main concern is that the latest consultation document shows a significant shift away from an integrated approach with the neighbouring and effected Local Authorities to a more insular and separate approach. Previously, the Countryside Agency was seeking formal joint working arrangements with the existing authorities. It would now appear that you would prefer a more autonomous approach with only voluntary working arrangements.

This approach is further reinforced by seeking advice from DEFRA on a reduction in the number of board members for the new Park Authority. This may result in some authorities having no representation at all further isolating neighbouring and affected authorities from integration within the new Park Authority. It is essential for the future of area that the new Park Authority is well integrated with good local representation on the board so local residents can see that their concerns are being taken into account.

My Authority’s detailed comments on your proposals are as follows:-

1)	Response to membership of South Downs National Park: That the Borough Council would want a National Park Authority which allowed them at least one seat on the board.
2)	Response to Parish Membership: The approach advised by the CA for the selection of parish membership is acceptable
3)	Response to creating a skilled administration: The Borough Council agree that in appointing members, a wide range of skills to achieve a balance of interest should be sought. We would hope that it is still intended to keep the same proportion of individuals to councillors as previously recommended and would agree that a code of conduct and ongoing training is essential.

4)	<p>Response to Structure Planning: The Authority is disappointed that the CA has not chosen to advise DEFRA that the new Park Authority should work more formally on a joint structure plan, with the Authorities affected. A voluntary agreement on co-operation and consultation is not sufficient to safeguard the interests of the wider area. The proposal for a Unitary Development Plan means that the park will be strategically truncated from its surroundings. The National Park will effectively be operating on its own, with only voluntary arrangements to work with or consult its neighbouring authorities. This Authority would prefer the new Park Authority to have formalised joint working with the relevant Structure Plan Authorities.</p>
5)	<p>Response to Waste Planning: This Authority would prefer to see joint working with the existing Waste Authorities: East Sussex County Council and Brighton and Hove City Council; West Sussex; Hampshire County Council, Southampton City Council and Portsmouth City Council.</p>
6)	<p>Response to Local Plans: The CA approach is acceptable.</p>
7)	<p>Response to the Development Control function: The Borough Council is disappointed that the CA are not recommending a transfer of the Development Control function to the Local Authorities, but would accept the delegation of the function back to its own officers and members. In the latter instance, the local authority staff could then make presentations to the National Park Committee on major or contentious applications as well as those recommended against adopted policy.</p>
8)	<p>Response concerning land management: The Borough Council generally support this approach, provided the conservation of the landscape is not at the expense of the social and economic well being of the area. It is also essential that adequate resources are identified to ensure satisfactory landscape conservation and restoration, sustainable farming and woodland management. The Borough Council support the strengthening of the marine conservation area status and voluntary codes of conduct into an integrated management plan.</p>

9)	<p>Response concerning visitor management: Eastbourne Borough Council would welcome the added value a Park Authority Ranger Service would bring to our existing countryside management service.</p>
10)	<p>Response to the CA proposal concerning rights of way: Eastbourne Borough Council would agree that the management of access and rights of way should be delegated to the new Park Authority, however, the extent of the delegation should be decided by the County Councils, working closely with the Park Authority to achieve a working partnership that is properly resourced.</p>
11)	<p>Response concerning transport: The approach proposed by the Agency is considered to be generally acceptable. However in respect of delivering parts of the transport strategy and implementing transport policy it is assumed that the park authority would not directly institute highway works because of their likely lack of expertise. The park authority should also not extend or supersede the area highway authorities areas of responsibility for highway infrastructure, which would include roads and footpaths. Therefore, the Park Authority should work in partnership with the Highway Authority. The Borough Council is also concerned that any new arrangements should be properly resourced and funded.</p>
12)	<p>Response concerning tourism: The Borough Council welcomes the CA's proposed advice to DEFRA that they will prepare a joint tourism strategy and an active role in promotion and support of sustainable tourism.</p>
13)	<p>Response concerning education and interpretation: The Borough Council considers the approach proposed by the CA is acceptable. The Beachy Head Countryside Centre, on the Eastbourne downland, would be appropriate for this function.</p>
14)	<p>Response concerning a Park Management Plan: The Borough Council agrees in principle with the CA proposal but would like to be consulted on the detail of how the Council's plans and policies are to be integrated with the Park Authorities' proposal.</p>

15)	Response concerning working in partnership: That Eastbourne Borough Council supports the need for close partnerships between the Park Authority and other bodies and that the Park Authority builds on the close working partnerships already established with the South Downs Conservation Board.
16)	Response concerning involving local people: The Borough Council welcomes the involvement of local people in the visions of the Park Authority and would support the Park Authorities involvement with the Eastbourne Strategic Partnership and the presentation of a Community Strategy.
17)	Response to boundary issue: That the Borough Council supports the current boundary in Eastbourne but would recommend inclusion of the area shown in the attached Appendix within the South Downs National Park boundary.

If you would like to discuss any of the above matters further then please contact me.

Yours faithfully

Councillor Mrs Healy

Leader of the Council

Encls: