

CABINET

11 October 2006

THE SOUTH DOWNS MANAGEMENT PLAN - CONSULTATION DRAFT

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RECENT REFERENCES:

CAB 807 - Report on the South Downs Interim Management Plan - 3 March 2004.

CAB 1177 - The South Downs Management Plan – Delegation of Responsibility - 14 December 2005.

EXECUTIVE SUMMARY:

This report relates to the further preparation and planned implementation of a Management Plan for the South Downs. The Plan is initially intended to provide for the management of the adjoining East Hampshire and Sussex Downs Areas of Outstanding Natural Beauty. However, depending on the eventual outcome of the Countryside Agency's current proposals for the establishment of a new South Downs National Park, such a Plan may well provide a blue-print for the long-term management of a larger Park area, by a National Park Authority.

The report refers to the more detailed work which has been carried out in recent months, on behalf of the South Downs Joint Committee and in consultation with the Committee's partner Authorities and government agencies. This further work has been aimed primarily at refining and preparing a finished draft of the Plan for public consultation.

Consultation on the finalised draft Management Plan is now in progress and will continue until the end of October, 2006. Central to the Plan is a 'twenty-year vision' which is intended to provide for the overall management of this protected landscape, as currently defined by the two adjoining Areas of Outstanding Natural Beauty. In support of this, the South Downs Joint Committee has also put forward a series of 'practical ambitions' and 'policy responses', to give a practical emphasis to the delivery of the Plan's 'vision'.

Concurrently with the Joint Committee's consultation on the Management Plan, a revised set of Planning Guidelines has been issued. The Guidelines, which are intended to inform and underpin the Joint Committee's comments on relevant planning applications within the AONBs, were originally adopted by the Committee's predecessor bodies, the Sussex Downs Conservation Board and the East Hampshire AONB Joint Advisory Committee. However,

primarily as a result of more recent changes in planning legislation and Government planning guidance, the Guidelines have now been revised and updated and the resulting document submitted to all the Committee's partner Authorities for comments to be made at this time.

#### RECOMMENDATIONS:

1. That Cabinet thanks the South Downs Joint Committee for this opportunity to make comments on its draft South Downs Management Plan and advises the Committee that in general terms the City Council supports the Management Plan's 'vision', key ambitions and policy responses, as set out in Appendix A and Appendix B to this report.
2. That Cabinet confirms the Council's willingness to incorporate the relevant principles from the South Downs Management Plan in its emerging Local Development Framework documents.
3. Notwithstanding the above, that Cabinet urges the Joint Committee to consider making further adjustments to the form and layout of the Plan, in order to achieve a shorter and simpler document which makes greater use of appendices and begins with an executive summary.
3. That Cabinet endorses the draft Plan's policy response to development pressures affecting the South Downs, which combines a clear planning policy framework to conserve and enhance the Downs with ensuring that planning decisions are consistent with that framework but, nevertheless, encourages the Joint Committee to consider some further changes to balance this necessary approach with additional policy provisions that are supportive of the need for sustainable growth and change.
4. That Cabinet supports the draft Management Plan's policies for a buoyant local economy, supported by and directly contributing to the South Downs' landscape and its public enjoyment but requests that, as part of that approach, the Plan should make a clearer policy provision for addressing and, where necessary managing, all forms of tourism and other visits to the South Downs, as part of any integrated marketing strategy for the South Downs.
5. That Cabinet proposes that the issues arising from a lack of affordable housing be given greater prominence in the Management Plan, that further measures be considered to address the problem of affordability, together with those associated economic and social problems which are having an increasingly harmful effect on rural communities in the South Downs and that the Plan should make clear that, in the event of a National Park being confirmed, the Joint Committee expects planning provision for affordable housing to be made, for both key workers and residents of the Park, within the Park's boundaries.
6. That Cabinet supports the Planning Guidelines as updated and revised but requests that the Joint Committee give further consideration to the issue of seeking to apply quantified standards, such as in regard to restricting the extension of residential properties in rural areas, where the Guidelines may not be consistent with the standards adopted by the local planning authorities.

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#### REPORT OF CHIEF EXECUTIVE

##### DETAIL:

#### 1 Introduction

- 1.1 Under the terms of the Countryside and Rights of Way Act 2000, local authorities in England and Wales were given responsibility for producing management plans for the designated Areas of Outstanding Natural Beauty (AONBs). However, the process of producing such a plan for the East Hampshire AONB and Sussex Downs AONB was delayed by the Countryside Agency's (CA) decision to proceed towards designating these combined areas as part of a new South Downs National Park.

#### 2 The Management Plan

- 2.1 As a result of these considerations, an Interim Management Plan was prepared in draft form by officers of the Sussex Downs Conservation Board (SDCB) and East Hampshire AONB (EHAONB). This was designed from the outset to be capable of amendment and updating, as future circumstances required. However, in practice, any such Plan might well serve to provide only for the period leading up to the establishment of a National Park for the South Downs. In that event, a newly inaugurated National Park Authority would then take over the administration of the Park area from the present local authorities.
- 2.2 In the meantime, and with the formal agreement and support of all the County, District and Unitary authorities concerned, a South Downs Joint Committee has been appointed and brought into being as the interim management body for the South Downs, replacing both the Sussex Downs Conservation Board and the Joint Advisory Committee of the East Hampshire AONB.
- 2.3 Since its inauguration in July 2005, the South Downs Joint Committee has sought to address shortcomings which originated from certain aspects of the Interim Management Plan. Through discussion with all its local authority and other partners a great deal of additional work has been carried out, particularly in the areas of data gathering and analysis.
- 2.4 The Joint Committee is keenly aware of its pivotal position in these matters and is conscious that the emerging Management Plan is setting priorities for future action. These include areas of strategic and practical work where the Committee feels it necessary to take a lead, both in the long term interests of the South Downs and, if necessary, to enable a smooth and effective handover to a National Park Authority.
- 2.5 Therefore, in order to focus on resolving certain outstanding reservations, previously expressed by partner Authorities and to bring together the various strands of work and move forward more quickly to finalise a draft version of the Plan the Committee, spurred on by what was then an expected decision on the proposed National Park, sought and obtained (in December 2005 - January 2006) the agreement of all the Authorities to delegate authority to the Committee, to complete this task.

2.6 The Plan, at its present stage, is the result of that delegation and has certainly benefited from additional work in specific topic areas, such as that of the historic environment. In addition, further updating has been carried out in order to take on board the new and rapidly changing rural policy climate. However, work is still needed in other, related areas including the completion of a Draft Business Plan, to define and clarify the role of the Joint Committee in delivering the Management Plan. Furthermore, there are continuing officer concerns relating to the main draft Plan and its accompanying Planning Guidelines which will be expressed later in this report.

### 3 The Management Plan

3.1 The finalised draft version of the South Downs Management Plan, now subject to consultation, addresses the long-term needs of the protected landscape of the South Downs, as an entity and does not simply seek to introduce a new management tool to facilitate the role undertaken by any particular managing body, including a possible future National Park Authority. Furthermore, it has been recognised that such a Plan needs to be capable of linking closely and effectively with individual Community Strategies across the entire area of the South Downs.

3.2 Taking the above into account, the Management Plan begins by setting out a 'vision' for the future of the South Downs. This vision, which looks forward to the mid-2020s, is outlined in a summary leaflet (attached to this report, as Appendix A). Reflecting the Plan's overall remit, the over-arching aims for the Downs are stated as being:

- The protection, conservation and enhancement of the natural beauty of the South Downs.
- The promotion of opportunities for the understanding and quiet enjoyment of the area's special qualities
- The encouragement of sustainable forms of economic and community development in ways that will help to support the first two aims.

3.3 The Management Plan's aims call for the conservation and enhancement of natural beauty to lie at the heart of all decisions affecting the future of the South Downs. The Plan goes on to indicate that "in the past, conservation decisions have been driven by a desire to minimise damage caused by change.... Continued incremental, but adverse, change is eroding the special qualities of the South Downs. Positive enhancement is required, with economic and community activities working together in support of environmental conservation".

3.4 The draft Plan then identifies the following, as key issues which represent current, or potential, threats to this nationally (and internationally) important landscape:

- Development pressures, resulting in visual and other impacts, the effects of traffic growth and infrastructure demands.
- Fundamental changes in agriculture and the rural economy, heightened by a loss of active management and the necessary skills base to deliver this.
- Growing recreation pressure and the conflict between different recreational activities.
- A widespread lack of understanding of the issues facing the South Downs and the cumulative harm caused by many individual decisions.

- The potential implications of climate change.
- 3.5 In terms of the draft Plan's overall scope, identification of the above 'key threats' leads to the development of 'Ten Ambitions for the South Downs', as listed in Appendix B to this report. The remainder of the Plan is, consequently, structured according to the objectives of these 'Ambitions' and consists of a management approach designed to support their intended improvements to the landscape quality, character and vibrancy of the South Downs, by use of the following methods:
- A series of targets which should be achieved over the coming five years, in support of the Plan's stated ambitions.
  - Policies that should guide the attainment of the specified targets and ambitions and also be subject, themselves, to a review every five years, under the terms of a separate Action Plan.
- 3.6 The policy responses set out in the Plan are intended to be implemented by landowners and managers of the South Downs, national and regional agencies, local government, charities and voluntary organisations.
- 3.7 Among the Ambitions set out in the Plan, three have a particular significance for the Winchester District.
- 3.8 Ambition 1: 'An unspoilt landscape of the highest quality and diversity reflecting its historic evolution'. The draft Plan seeks confirmation from all the local planning authorities concerned, that they will reflect relevant principles from it in their own emerging Local Development Framework documents. This approach can be developed, in preparation for Winchester's LDF Core Strategy's 'Preferred Options' (to be published for public consultation June-November 2007) and it is, therefore, recommended that this be formally confirmed to the Joint Committee.
- 3.9 The draft Plan recommends a 'robust planning policy framework for the conservation and enhancement of the South Downs' and that 'development control decisions are in line with the robust policy framework and take full account of the potential effects of development proposals on the natural beauty, local character and amenity of the South Downs'. This applies to both major development proposals and the cumulative impact of small scale changes. The City Council has taken a very robust line in protecting the Downs and Cabinet Members will doubtless wish to endorse the Management Plan's recommended policy response.
- 3.10 Ambition 7: 'A buoyant local economy directly contributing to the management of natural beauty and its enjoyment'. The policy responses intended to meet this particular ambition are generally consistent with the Council's strategic priority, which is to 'Foster a strong and diverse urban and rural economy'. The economic dimension of the Management Plan is essentially, therefore, in line with Winchester's own economic development strategy, in regard to such issues as raising the environmental sustainability of local businesses and reducing dependency on the private car.
- 3.11 Ambition 9: 'Sustainable rural communities strongly linked to the locality and with the housing to support local needs and essential workers'. The draft Plan's policy responses for the development of sustainable communities are generally in line with Winchester's existing policies and strategic priorities, particularly in regard to supporting local services, delivering an increasing amount of housing for those in need and encouraging sustainable transport initiatives. However, the provision of affordable housing is given relatively limited attention in the draft Management Plan and this apparent weakness in the Plan could be made worse, if the establishment of a new National Park resulted in additional economic pressures on

housing. It is, therefore, recommended that the Joint Committee be asked to clarify in the Plan that it will expect planning provision for affordable housing, for both residents of and key workers within the National Park, to be made within the Park's boundaries.

#### 4 Officer Comment

- 4.1 The draft Management Plan seeks to put in place a comprehensive and balanced strategy for countryside management within the South Downs, at least for the period up until the installation of any National Park Authority and, quite probably, elements of this would continue to influence management thinking and practices for some period beyond any such handover. The Plan and its policy provisions deal particularly well with issues related to landscape protection and countryside management in its purer sense. This deserves to be supported.
- 4.2 However, by comparison, the Plan appears to give relatively limited attention to the need to anticipate and, therefore, make active policy provision for the inevitable dynamic of growth and change. Consequently, it is recommended that the Joint Committee be asked to look again at this issue and encouraged to include an additional policy perspective which more clearly addresses the prospect of change and, to a degree, reflects the potentially altered context of a National Park, particularly in regard to leisure and recreation.
- 4.1 Overall, the Plan is extremely detailed and, to an extent, combines descriptive and executive passages in a way which could make it more difficult for a lay person to follow the otherwise close link between issues, threats and challenges, on the one hand and the appropriate policy measures that the Plan puts forward to address these. Given that one of the Plan's objectives is to promote a much wider public understanding of the South Downs and the many issues relating to it, it is important that a Management Plan should be as approachable and understandable as possible. It is, therefore, recommended that the Joint Committee should be given every encouragement to consider further revisions to the Plan, in order to make the main document shorter and simpler, partly by making greater use of appendices and the inclusion of an executive summary.
- 4.2 In general terms, the Plan's Ambitions are to be supported and it is, therefore, important that the Council should confirm its willingness to incorporate relevant principles from the Management Plan in its own emerging Local Development Documents. Nevertheless, there are concerns relating to two topic areas covered by the Plan, together with one particular aspect of the recently revised Planning Guidelines, produced in order to supplement and give greater weight to the Plan itself.
- 4.3 With regard to the issue of affordable housing shortages (dealt with in the Plan under Ambition 9, Issue 2 and its related policy response), it is recommended that the Joint Committee be asked to give greater prominence to this important issue. It is also recommended that further measures should be considered, in order to address the problem of affordability and those associated social and economic pressures which are having an increasing impact on rural communities within the South Downs.
- 4.4 Ambition 7, which deals with the local economy and related matters of buoyancy and vitality, places a necessary and appropriate emphasis on developing and promoting sustainable tourism. However, whilst acknowledging the increasing pressure of day-visits and other forms of what might be seen as comparatively 'unsustainable' tourism, the Plan does not appear to offer a particular policy response to this issue, or the related need to accommodate the pressure arising from large-scale, ad-hoc 'tourism' and to bring this within the scope of any integrated marketing strategy for the Downs.

- 4.5 The revised Planning Guidelines are generally to be welcomed, in that these are now brought up to date and reflect the requirements of current legislation and planning guidance. However, there are areas, such as the matter of seeking to restrict the scale of extensions and enlargements to residential property in rural areas, where the Guidelines take a particular stance, i.e. the Joint Committee will “as a matter of principle”, normally object to extensions which increase existing floor-space by more than 25%.
- 4.6 In practice, this advocates a standard which, in many cases, does not match that employed by the local planning authorities and yet those operational standards are likely to have been endorsed by way of an adopted local or unitary plan. It is recommended, therefore, that the Joint Committee should be requested to look again at this aspect of the Guidelines, to ensure that a consistent application of standards can be achieved, in cases where the both the Joint Committee and the authorities are broadly pursuing the same overall objective.

#### 4.1 Conclusion

- 4.2 Given the extent, diversity and complexity of the South Downs and the many pressures to which they are already subject, the draft Management Plan makes a creditable effort to put in place a series of policy measures designed to ensure the protection of this vulnerable landscape. The main thrust of the Plan provides an essential cornerstone, in terms of guiding the area’s longer term management and, in that sense, is considered worthy of support.
- 4.3 There are, however, particular aspects of the document, including its format and overall style, which give rise to concern. The report’s recommendations set out these concerns in a manner which is intended to be taken as constructive comment, aimed at improving the application and effectiveness of the Management Plan and it is hoped, therefore, that the Joint Committee will feel able to give further attention to the matters raised by the City Council.

#### OTHER CONSIDERATIONS:

##### 5 CORPORATE STRATEGY (RELEVANCE TO):

- 5.1 This report is of relevance to the Corporate Strategy’s Aim of maintaining a high quality of rural and village life, by supporting the rural economy and conserving the rural landscape, together with the Strategy’s objective of sustaining and improving the natural environment.

##### 6 RESOURCE IMPLICATIONS:

- 6.1 The Council is responsible for the production of a management plan for that part of the East Hampshire AONB within its area. A draft version of an Interim Management Plan was initially produced by the Sussex Downs Conservation Board and the East Hampshire AONB JAC, on behalf of all the ‘South Downs’ local authorities – within eastern Hampshire, West Sussex and East Sussex.
- 6.2 In taking over the functions and responsibilities of those bodies their immediate successor, the South Downs Joint Committee, has resumed work on the preparation and production of a strategic Management Plan for the South Downs. From the point of view of each individual authority, this represents a far more cost effective approach than would be the case if this work was undertaken independently.
- 6.3 The City Council already funds the AONB Project Officer. Currently, this contribution to the project’s costs amounts to £10,500, for the financial year 2005/06. To date, the Joint Committee has not requested any additional authority contributions to offset the cost of preparing the Management Plan.

- 6.4 The policies in the emerging Management Plan which, in advance of the establishment of any National Park regime it would be the City Council's responsibility to action, are not likely to have additional cost implications, bearing in mind that these are mostly concerned with existing responsibilities, such as the development and implementation of planning policies.

7 BACKGROUND DOCUMENTS:

- 7.1 Files and correspondence held in the Chief Executives Department and the Planning Department of the Development Services Directorate.

8 APPENDICES:

Appendix A. Draft South Downs Management Plan's Summary Leaflet.

Appendix B. Extract from the Management Plan, setting out the Plan's 'Ambitions for the South Downs'.