

## **Response by PeCAN to the Public Consultation by the SDNPA on Their Draft Updated Partnership Management Plan**

This document contains answers prepared by PeCAN to the survey questions posed by the SDNPA as part of a public consultation about their updated Partnership Management Plan (PMP), which took place during June and July 2025.

The content of this document follows the SDNPA's consultation template for partners and organisations. Text prepared by PeCAN is shown in the style and colour of this paragraph (Gill Sans MT Font size 11 in dark blue). PeCAN's answers to the multiple choice questions are highlighted in blue/turquoise. All other text is part of the template.

This document provides answers for all 61 questions in the consultation template except those for Objective 2.2 (Dark Skies), Aim 6 (Arts and Heritage) and Question 54 (planning principles and general principles).

## South Downs National Park Partnership Management Plan: Consultation Template

To submit your consultation response, please attach the completed word document and send to:

[managementplan@southdowns.gov.uk](mailto:managementplan@southdowns.gov.uk)

Firstly, please tell us the name of your organisation, who your submission represents.

**This question is required.**

Petersfield Climate Action Network (PeCAN)

We would like to be able to contact you in order to keep you updated about the final South Downs Partnership Management Plan, to be approved in December 2025. Please list any email addresses below that would be happy to be contacted.

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## Section 1: Vision & Aims

### The Vision:

*"The South Downs National Park is a vibrant place with nature everywhere, for everyone, where wildlife flourishes, clean water flows and the dark night skies are filled with stars. The landscape is adapted to climate change and sits at the heart of thriving communities and a green rural economy. Shaped by stories old and new, this place inspires everyone to connect, enjoy, care and belong."*

1. How far do you agree that the vision encompasses and reflect how you would like the South Downs National Park to be in 2060? *Please highlight your answer.*
  - Strongly Agree
  - Agree - **SELECTED**
  - Neutral
  - Disagree
  - Strongly Disagree

If you'd like to explain your answer, please do so here:

The revised Vision is punchy, succinct and readable. However, it needs to include mitigation as well as adaptation in referring to climate change. Aim 2 specifically mentions mitigation, and achieving Net Zero by 2040 will require extensive action to reduce emissions from the National Park landscape – communities, housing, transport and business. This, not just the need to adapt to existing climate change, should be reflected in the Vision. This could be achieved by adding:

*"...where wildlife flourishes, clean water flows, greenhouse gas emissions are dramatically reduced, and the dark night skies are filled with stars....etc."*

### Overall comments

PeCAN's mission is to help Petersfield and surrounding village communities reduce their carbon emissions and protect nature. Our vision is for the Petersfield area to become carbon neutral as quickly as possible.

PeCAN has benefited from a close working relationship with and strong support from the SDNPA. We appreciate this and are keen to ensure this continues, as we provide a link between the ambitions of the PMP and the local community which can help make these a reality, and can give feedback on how effective the PMP is in helping our community to be more sustainable. To this end we would like to take the opportunity to meet the SDNPA team drafting this plan, and would also suggest that the network of CANs, or their equivalents, across the NP (eg WinACC, ACAN etc) should have a seat on any partnership formed to help deliver it.

We are delighted to see the new draft PMP. It is very readable, and it is especially encouraging to see new sections on climate change and on water, both of which are very relevant in the Petersfield area of the NP, along with increased ambition on nature recovery. We have chosen to comment on these sections along with those on young people and greener economy, as PeCAN works on all of these issues.

However, there are a number of areas where we feel that the PMP as drafted is weak or inconsistent. Before responding on individual objectives and targets, we have some overall proposals which we believe would significantly strengthen the PMP. These are set out below.

### Be more ambitious with some objectives

In its PLTOF, Defra states "We encourage Protected Landscape bodies, both individually and collectively, and their local partners to push their ambition and go above and beyond the targets set here" (i.e. these are a minimum contribution rather than a limit set on what NPAs can aspire to).

It is good to see that in parts of the PMP, ambitions have been set high, for example with 60% nature recovery and net zero by 2040. But in other areas the objectives feel under ambitious.

For example, including a section on water is a very positive move as it broadens the scope of the PMP beyond the tramlines set by the Defra PLTOF to address an issue of crucial importance in this NP. But the target of 10% achieving WFD status is disappointing and seems to anticipate that other bodies (for example Water Companies or EA) will not have the resources or the will to accelerate delivery within the boundary of the NP. Similar comments apply to the section on access (where Highways and RoW Authorities are crucial).

We would prefer to see a high level of ambition in the PMP - along with complete transparency about the scale of the challenge and the fact that it will take all stakeholders, not just the SDNPA, to step up. The new s245 Duty on these and other public bodies/utilities requires them not merely to have regard to but to actively further the Purposes of the NP. So it would be good to see this reflected in the PMP.

The alternative is a weaker level of ambition which may be within more direct control of the SDNPA but will fall short of the transformational change that is needed. As drafted parts of the PMP look more like this.

Since it is acknowledged by the SDNPA and by Defra that the ambitions in NP Management Plans cannot be delivered by the NPA alone, it is worth drawing a clear distinction between actions where SDNPA's can have different levels of influence, which are:

- Delivered directly by the SDNPA (eg through its ranger services, planning service etc);
- Delivered by others but influenced and supported by the SDNPA (eg) projects undertaken by residents, farmers, schools, community groups and local businesses but where the SDNPA can have a strong influence through for example advice its advice or grant funding;
- Outside the influence of the SDNPA but will have a material positive or negative influence during the lifetime of the PMP – for example the investment rounds of Water Companies, creation of new Mayors and Unitary Authorities – and where SDNPA may have a role in system change advocacy, for example through its consultation responses to central government or the new Mayors and Unitary Authorities.

An example of this approach can be found in EHDC's climate strategy, which presents a hierarchy of (i) direct control, (ii) influence via partner organisations, and (iii) influencing via the public (see page 14 <https://www.easthants.gov.uk/climate/climate-and-environment-strategy-2024-29>).

## **Ensure that targets match level of ambition and lock in stakeholders**

Even where objectives set out a high level of ambition, the targets set out below them do not capture the amount of effort, and the number of partners, that will be required to secure these objectives. They often seem to default to what the SDNPA itself hopes to deliver.

The PLTOF framework from Defra states *“The Protected Landscapes cannot reach these targets on their own. Success will require active participation by a wide range of stakeholders across all sectors”* and *“The framework will empower Protected Landscape bodies, relevant authorities, farmers, land managers and other organisations to work together in planning and targeting resources and activity”*.

Much of the supporting text throughout the PMP makes this very clear, yet when it comes to Objectives and Targets things become more confusing. It would help if there was a much clearer distinction between what are all called “targets” as these fall into three types:

- a. Targets (true). These should set out a measurable improvement on the ground which is to be achieved. For example: Target 1.1c (positive trend in priority species) or 1.3a (80% SSSIs in favourable condition), 2.2 (increase tree canopy and woodland cover by 880ha); 3.2a (achieve a 10% improvement in WFD status).
- b. Stakeholder actions. These should describe actions it is intended that stakeholders will have taken. For example: Target 1.1a (restore or create 3260ha new habitat), 2.1b (sign up to a nature & climate pledge), 5.1f (partners to have adopted sustainable travel plans)

c. SDNPA outputs. For example Target 1.2a (offer advisory support to farmers landowners and foresters), Target 2.2b (support farmers and landowners), Target 5.1b (deliver 25km of accessible path), and Target 7.1e (grow the Our South Downs business network).

A clear separation between actions the SDNPA itself will take (for which it will want to be accountable to Defra and to partners) and the actions that it is intended that other Stakeholders and partners will take will make the plan easier to monitor.

### **Make the links to the Local Plan and DM service more explicit**

The new Local Plan is being developed in a similar timescale to this PMP, and is a primary mechanism the SDNPA can use to support the objectives. It would therefore be useful to see a clear cross reference throughout the PMP to the Local Plan policies which are relevant – for example on BNG, regenerative farming, walking & cycling provision and low carbon housing. The same applies in reverse, ie the Local Plan should make clear where it is contributing to the PMP objectives.

It is not only the Local Plan policies which matter but the actual outcomes on the ground, so the SDNPA's DM service – pre-app, handling and approving applications and monitoring whether conditions set have been delivered - is crucial. See below.

### **Set out how the PMP will be delivered and how progress will be measured**

We hope that the final PMP will include a strong section on how the plan will be delivered and how progress will be measured – in particular above and beyond what the SDNPA itself has delivered.

At PeCAN we are aware that a lot of work is going on behind the scenes to engage key stakeholders in the PMP and this is very encouraging. But this is invisible to most residents and consultees.

If a new Delivery Partnership is put in place this would go a long way to addressing many of the points above. It would be sensible to include a place on it for a representative of the CANs as mentioned above.

Distinguishing between the three types of “targets” as suggested above would make it easier to monitor progress ie

- Targets – measure changes on the ground as part of the State of the Park report and evidence base;
- Stakeholder actions – measure actions by key stakeholders eg investment in the RoW network, grants given to SSSI owners, progress in upgrading waste water treatment works;
- SDNPA outputs – report through business plan on work undertaken by ranger service, planners, FiPL team etc.

## Aims:

We have spoken with partners, farmers, residents, communities, parishes, local authorities and other public bodies, visitors, businesses and specialists to help identify a clear set of shared and challenging priorities for the next five years to help us work together to make this vision a reality.

Two key, intertwined themes have emerged – Nature & Climate and People & Place.

Below these themes sit 7 aims:

- Aim 1: Nature Recovery: The National Park is a nature-rich, resilient working landscape where wildlife flourishes
  - Aim 2: Climate Action: The South Downs National Park is on track to become net zero by 2040 by mitigating and adapting to the impacts of climate change.
  - Aim 3: Clean Water: Clean, abundant water supports nature and communities in the South Downs and beyond.
  - Aim 4: Young People: Young people will have opportunities to access training and skills to enable them to take action to care for and enhance the National Park.
  - Aim 5: Welcome and Access: A valued South Downs is welcoming and accessible to all
  - Aim 6: Arts and Heritage: Cultural Heritage is conserved, understood, valued, created and passed on for future generations.
  - Aim 7: A thriving, greener place: A thriving rural economy and local communities sit at the heart of the National Park
2. Looking at the complete list of aims above, do you agree that this is an appropriate list of priorities for the National Park over the next 5 years? *Please highlight your answer.*
- Yes - **SELECTED**
  - No

If you answered 'No', please could you explain why?

We strongly welcome the inclusion of Aims on climate change and water.

**THE NEXT SECTIONS COVER EACH AIM IN DETAIL. PLEASE ONLY COMPLETE THE QUESTIONS FOR THE AIMS YOU WISH TO COMMENT ON. NONE ARE MANDATORY.**

## Section 2: Nature & Climate

Three key aims have been identified to focus collective action for Nature & Climate over the next five years. Each aim has a set of clear objectives that will help us to achieve the overall aim. Each objective has measurable targets that will help us to monitor progress and evaluate success.

### **Aim 1: The National Park is a nature-rich, resilient working landscape where wildlife flourishes**

**Objective 1.1:** To improve, expand, connect and increase the resilience of wildlife-rich habitats and land managed for nature to ensure we are on track to reach 60% managed for nature by 2060.

**Objective 1.2:** To support land-based businesses to thrive as economically viable, nature-friendly food and drink producers.

#### Targets for Objective 1.1

**Target 1.1a:** Restore or create more than 3,260ha hectares of a range of wildlife-rich habitats within the South Downs National Park, outside protected sites by 2031 (PLTOF target 1\*)

**Target 1.1b:** 60% of the South Downs National Park is managed for Nature by 2060

**Target 1.1c:** By 2031, long-term monitoring data for south downs priority species shows a stable or increasing trend at sites where habitat management or creation is taking place.

#### Targets for Objective 1.2

**Target 1.2a:** Offer advisory support to farmers, foresters and landowners aiming to increase the proportion of farms with any diversified activity across the National Park by 7.5% by 2031.

#### Targets for Objective 1.3:

**Target 1.3a:** Bring 80% of SSSIs within the National Park into favourable condition by 2042 (PLTOF Target 2\*).

**Target 1.3b:** For 60% of SSSIs within the National Park assessed as having 'actions on track' to achieve favourable condition by 31 January 2028 (PLTOF Target 3\*).

**Target 1.3c:** Continuing favourable management of all existing priority habitat already in favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042 (PLTOF Target 4\*).

*\*The Government has developed the [Protected Landscape Targets and Outcomes Framework](#) (PLTOF) with ten targets for protected landscapes*

3.How far do you agree that Aim 1 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

• Strongly Agree - **SELECTED**

- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:

The introduction under Aim 1 (Pages 20-21) sets out the scale of the challenge very well. The former ReNature target of achieving 30% managed for nature by 2030 was rightly ambitious and (through mechanisms such as FIPL, voluntary BNG, the nature-based-solutions market, and the support of the South Downs Trust). It is good to see that commitments have been secured over 6,766ha of the 13,000ha aimed for in the original target.



## Objective 1.1:

**To improve, expand, connect and increase the resilience of wildlife-rich habitats and land managed for nature to ensure we are on track to reach 60% managed for nature by 2060.**

4. Do you agree that Objective 1.1 is an appropriate objective that will help to achieve Aim 1 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why

This objective ramps up the previous commitment of 30% by 2030 to 60% by 2060. This is certainly very ambitious and implies a wholesale change in the way land is managed across two thirds of the National Park. However, as in other parts of the PMP, there seems to be a gap between the very ambitious objective and the targets below it.

Target 1.1a is the only one of the three (creating more than 3,260 ha of wildlife-rich habitats) which describes HOW the objective might be achieved – it is written as an action. This target clearly flows straight from the PLTOF, is a strong ambition and one which the SDNPA can influence directly, and we support it.

However:

- Target 1.1b simply repeats the objective (60% by 2060).
- Target 1.1c relates to the observed trend in priority species.

Achieving 60% by 2060 implies that two-thirds of the NP area will be managed for nature. Given the current extent of, for example, intensive arable farming on the dip slope of the downs, this implies a fundamental shift towards regenerative mixed farming and conversion to wood pasture systems (see also Objective 2.2). The targets here and under 2.2 could better reflect the scale of change needed and the ways in which progress can be measured.

For example rearranging the existing targets under the three types described in our introduction makes it easier to see where the gaps and overlaps area ie:

a) Targets (true) ie measurable improvement on the ground. Existing Target 1.1c (positive trend in priority species), 1.3a (80% SSSIs in favourable condition), 2.2c (increase tree canopy and woodland cover by 880ha); Could add something on extent of new semi-natural grassland or wood pasture.

b) Stakeholder actions. Existing Target 1.1a (restore or create 3260 ha new habitat), 1.3b (60% SSSIs have actions on track), 2.2a (65-80% adopt nature-friendly farming), 2.2b (regenerative farming across 8,000 ha). Could be clearer about which organisation needs to do what to achieve this, eg Defra, NFU, CLA, NE, RPA.

c) SDNPA outputs. Existing Target 1.2a (offer advisory support to farmers landowners and foresters), 2.1b (sign up to a nature & climate pledge), 2.2b (support farmers and landowners), Could add planning decisions which support diversification, grants given for nature recovery and support for community action on nature (see Q5 below).

5. Does Objective 1.1 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

PeCAN already has a strong track record in community-based action to conserve and restore nature through its own Nature Recovery work stream. Events such as the Tree Festivals, A Fruit Tree in Every Garden, Eco Fairs,

Swift week, and tasks to control invasive non-native species have raised awareness, engaged volunteers in direct action and linked with local partners such as the Petersfield Community Garden, Tree Council, Hampshire Swifts and Petersfield Town Council. An aim of our Schools Outreach Project is to educate the younger generation about nature and the environment (see our response to Question 29 about Objective 4.1).

Although it is crucial to nature recovery for the SDNPA to work with farmers and businesses, supporting action at community level (via organisations like PeCAN and the many others across the NP) also matters. The community dimension to the Nature section of the PMP feels light when compared with eg the Climate section where supporting local communities is from and centre.

We propose that an action orientated target is added about community action on nature recovery (similar to Targets 2.1b and 2.1d under the Climate objectives). For example: support X community groups to delivery Y local nature recovery projects by 2031.

6. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards Objective 1.1? *Please highlight your answer.*

- Yes
- Somewhat - **SELECTED**
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

See above. As written, Targets 1.1b and 1.1c are about measuring evidence of nature recovery on the ground (hectares of habitat and trends in priority species). It is hoped that the Local Nature Recovery Strategies for Hampshire and Sussex will be gathering these and other relevant data and if easily cut to the National Park boundary this will be useful.

**Objective 1.2: To support land-based businesses to thrive as economically viable, nature-friendly food and drink producers.**

7. Do you agree that Objective 1.2 is an appropriate objective that will help to achieve Aim 1 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**

- 

- No

If you answered 'No', please could you explain why?

Objective 1.2 is very welcome as land-based businesses are one of the main channels through which a more sustainable environment can be achieved around Petersfield and across the National Park. However, the objective could be strengthened by including an explicit reference to climate change and forestry/woodland management eg: "...thrive as economically viable, nature friendly and low carbon producers of food, drink and timber."

Many land-based businesses in our area are partly or mainly concerned with forestry and woodland management, producing fibre/timber rather than food & drink. Target 1.2a reflects this by mentioning "foresters". As the PMP acknowledges, the South Downs National Park has the highest proportion of forestry and woodland cover of any National Park, and the downs and weald in West Sussex and East Hampshire are a prime example.

When managed more sustainably these places can offer multiple benefits – for example nature recovery, biodiversity offsets, carbon sequestration, substitution of imported timber, flood risk management and by providing spaces for residents and visitors to enjoy.

8. Does Objective 1.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**

- No - this objective isn't relevant to my organisation

- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

To date, PeCAN's work has focused more on households, schools and the local community in and around Petersfield. But we are also concerned to connect with local farmers and landowners to encourage more nature-friendly and low carbon approaches. Early actions have included a highly successful public screening of "Six Inches of Soil" which included a farmer panel, and a Trustees visit to a nearby regenerative farm. There is an opportunity to work more closely with the SDNPA, WRST, Eco Rother Action and others to connect our local networks and expertise with the South Downs and Selborne Farm clusters and the emerging network of farmers and estates involved with the River Rother and its tributaries. These form such an important part of our local environment.

9. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 1.2? *Please highlight your answer.*

- Yes

- Somewhat

- No - **SELECTED**

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

Objective 1.2 is supported by just one Target (1.2a) which largely seems to be a rewrite of it (with "support" replaced by "offer advisory support") though with the addition of a 7.5% aspiration.

Whilst it is good to see an aspiration here – increasing the proportion of diversified farms by 7.5% - this seems very unambitious given the changes in national policy, support schemes, new markets especially BNG, trade

agreements, diet etc which are evident now and will be moving apace in the next five years. This may be another example in the PMP of setting a target only in relation to the actions of the SDNPA (eg in this case through FiPL and Ranger advice) rather than encompassing the actions of other stakeholders such as NE, EA, and Rivers Trusts.

Target 1.2a does not mention forestry and woodland enterprises – an equivalent target for these could be along the lines of: “Support X forestry and woodland businesses to increase the proportion under sustainable management to Y%”. Again, the targets should encompass the ambition of bodies such as the Woodland Trust, FC etc, as well the SDNPA itself.

In addition to capturing both farmers and foresters, it would be useful set out what such diversification might achieve. How will the SDNPA measure the benefits on the ground of a more sustainable approach? For example these might include:

- Reduced food miles;
- Shifting carbon budget to net zero or even net positive;
- Increased access to locally produced food, drink and timber;
- Reduced pollution load to the NP environment, eg from nitrates, soil run-off etc;
- Improvements in soil health & biodiversity;
- Increased profit in relation to turnover;
- Better and higher quality public access.

Many of which would contribute towards the other Aims and Objectives of this plan.

### Objective 1.3: Improve and manage existing nature-rich sites – protected sites and priority habitats

10. Do you agree that Objective 1.3 is an appropriate objective that will help to achieve Aim 1 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

It is good to see an explicit objective on existing sites and this aligns with the PLTOF. However, the focus on SSSIs is limiting (see the text by PeCAN about the Targets for Objective 1.3) as the SDNP has such a large number of SINC/SSSIs see Question 12.

11. Does Objective 1.3 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

As mentioned elsewhere, PeCAN has a nature recovery programme focused on communities in Petersfield. This approach goes well beyond SSSIs to other wildlife sites, urban greenspaces, road verges and iconic species such as Swifts and Butterflies. With continuing support from the SDNPA, we can do more to engage residents, and visitors to this area, with local and much loved SSSIs such as Noar Hill, Butser Hill, Ashford Hangers and Stedham & Iping Common.

12. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 1.3. *Please highlight your answer.*

- Yes
- Somewhat - **SELECTED**
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

Whilst the focus on SSSIs is understandable and driven by the PLTOF framework, the area around Petersfield is typical of many parts of the National Park in having a large number of SINCS/SNCIs as well. These are a crucial part of the jigsaw and make a major contribution to biodiversity and landscape. The most dramatic example is the Rother sub-catchment, mentioned elsewhere. Target 3.1c addresses this but could make specific reference to SINCS/SNCIs.

**Aim 2: The South Downs National Park is on track to become net zero by 2040 by mitigating and adapting to the impacts of climate change**

**Objective 2.1:** To support businesses and local communities to take positive climate action to ensure they are adapted and resilient to climate change.

**Objective 2.2:** To support land managers, farmers, foresters and landowners in their aspirations to deliver nature recovery and climate action on their land.

Targets for Objective 2.1

**Target 2.1a:** Reduce net greenhouse gas emissions in South Downs National Park to net zero by 2040 relative to 1990 levels (this goes beyond PLTOF Target 6 which aims to reach net zero by 2050)

**Target 2.1b:** By 2031, community groups from each parish in the National Park to have signed up to a nature and climate pledge (e.g. establish a repair café, community orchard)

**Target 2.1c:** By 2031, businesses from each parish in the National Park signed up to a nature and climate pledge

**Target 2.1d:** By 2031, community groups from each parish in the National Park to be registered and utilising the climate action knowledge hub (accessing resources about retrofit / rain gardens / flood mitigation, community energy plans)

Targets for Objective 2.2

**Target 2.2a:** Ensuring at least 65% to 80% of land managers adopt nature friendly farming on at least 10% to 15% of their land by 2030 (PLTOF Target 5)

**Target 2.2b:** Support farmers and landowners to implement regenerative farming practices across 8,000 hectares of the National Park by 2031.

**Target 2.2c:** Increase tree canopy and woodland cover across the National Park by 888ha by 2031 (PLTOF Target 8)

**Target 2.2d:** By 2031, collaborate with partners to help farms and landowners create carbon literacy and climate resilience plans—covering soil health and flood management—for 100 farms and landowners throughout the National Park

13. How far do you agree that Aim 2 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

- Strongly Agree - **SELECTED**
- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:

Climate change and related nature loss can severely damage the National Park's habits and ecosystems (<https://publications.naturalengland.org.uk/publication/6511042645458944>), which would threaten the Park Authority's purpose of conserving the South Downs for future generations. The acceleration of global climate change is increasing this threat and reducing our time to respond (<https://www.tandfonline.com/doi/full/10.1080/00139157.2025.2434494#abstract>).

That makes the proposed earlier-than-PLTOF net zero target of 2040 very welcome because it would frontload climate mitigation and adaptation actions, allowing for more overall climate action to be achieved over the same time period.

The aim aligns with the climate ambitions of National Parks England (<https://nationalparksengland.org.uk/climate-leadership>) and supports the Park Authority's long-term conservation goals.

We imagine there may be concerns about setting such an ambitious aim, for example, delivery will require numerous actors to gather resources and take action, which cannot be guaranteed. However, given the seriousness of the climate and nature crises, we feel that it is better to set a higher target and bear some delivery risk than to set a weaker target and run the much greater risk of failing to conserve the Park's ecosystems.

Another reason for setting an earlier target is that the Park's residents have a higher carbon footprint than the national average and an earlier target is needed to offset this, if the Park is not to act as a drag on the national 2050 target (2022 Small World Consulting report). Not setting an earlier target would thus undermine the national target.

We welcome that the aim refers to both mitigation and adaptation.

**Objective 2:1 To support businesses and local communities to take positive climate action to ensure they are adapted and resilient to climate change.**

14. Do you agree that Objective 2.1 is an appropriate objective that will help to achieve Aim 2 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

We support this objective and suggest a slight rewording to raise the importance of mitigation, for example: "To support businesses and local communities to reduce greenhouse gas emissions and to ensure they are adapted and resilient to climate change."

15. Does Objective 2.1 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

This aligns closely with PeCAN's strategy and our charitable objective, which is the "advancement of environmental protection for the public benefit through community-led initiatives that mitigate climate change and minimise biodiversity loss for the benefit of residents and the general public in and around the Petersfield area."

Our strategy and constitution are both available at: <https://petersfieldcan.org/about-us>

16. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 2.1? *Please highlight your answer.*

- Yes
- Somewhat - **SELECTED**
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

There is a target mismatch here. Target 2.1a restates the Aim without providing detail about how it will be achieved. The other targets are useful but insufficient to achieve the Aim.

We suggest replacing Target 2.1a with a specific target around implementation of the SDNPA's Climate Strategy and Climate Action Plan, including any updates or additions that are needed to align the Climate Strategy and Climate Action Plan with the PMP and this aim in particular.

This would improve consistency between core documents and automatically bring a wider list of actions into the PMP that can contribute to achieving the aim, while leaving open the possibility to spot and fill gaps.



**Objective 2.2: To support land managers, farmers, foresters and landowners in their aspirations to deliver nature recovery and climate action on their land.**

17. Do you agree that Objective 2.2 is an appropriate objective that will help to achieve Aim 2 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

We suggest a small edit “To support and strengthen...”

That would allow for outreach activities that can create new aspirations, as well as ones that support aspirations that already exist.

18. Does Objective 2.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

This matches PeCAN's charitable objective, which is the: “advancement of environmental protection for the public benefit through community-led initiatives that mitigate climate change and minimise biodiversity loss for the benefit of residents and the general public in and around the Petersfield area.” (PeCAN constitution, <https://petersfieldcan.org/about-us>).

Engaging land managers, farmers, foresters and landowners is only a small part of our work at the moment, purely because of resource constraints. However, we agree that this is an essential activity and would be pleased to support it given the opportunity.

19. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 2.2? *Please highlight your answer.*

- Yes - **SELECTED**
- Somewhat
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

The targets follow PLTOF. We make two comments:

Target 2.2a: it might be helpful to define “nature-friendly farming” and to clarify what level of responsibility SDNPA wishes to assume in relation to the word “ensure”.

Target 2.2d: this could be clearer about who does what. Helping carbon literacy among farmers and landowners could be a task for SDNPA and partners; while delivering changes in land-use to reduce soil emissions as a consequence of having received carbon literacy training would be a task for farmers and landowners. We suggest a small edit so that this Target reads: “By 2031, collaborate with partners to help farms and landowners with carbon literacy and to create carbon management and climate resilience plans, covering soil health and flood management, for 100 farms and landowners throughout the National Park.”

### **Aim 3: Clean, abundant water supports nature and communities in the South Downs and beyond**

**Objective 3.1:** To support catchment-based partnership approaches to water management so that nature and communities can thrive, and flood risk is reduced.

**Objective 3.2:** To improve the condition of the water environment to ensure enough clean water for nature and people, and water habitats are restored.

#### Targets for Objective 3.1

**Target 3.1a:** By 2031, all catchment partnerships to have the resources to develop a pipeline of deliverable projects.

#### Targets for Objective 3.2

**Target 3.2a:** Achieve a 10% improvement in Water Framework Directive status for waterbodies across the National Park by 2031.

20. How far do you agree that Aim 3 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

- Strongly Agree - **SELECTED**
- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:

It is very positive to see the inclusion of the Aim and Objectives for water in this PMP. Water has been a crucial issue for this National Park since its inception in 2011, and was highlighted in the original State of the National Park Report. So it is good to see the PMP extending its scope beyond the PLTOF framework. In the Petersfield area, both the chalk aquifer and our rivers and streams are of great importance to residents. In addition to the main channel of the Rother, which passes just north and east of the town, we are privileged to have numerous tributaries (such as the Stambridge Stream, Drum Brook and Tilmore Brook) running through its heart.

However, the text introducing Aim 3 (pp 30-31) seems to understate the problem with our rivers in the NP, the urgency and the scale of action required to tackle it. For example:

- None of the rivers within our National Park achieve good WFD status;
- The Lavant is amongst the most subject to sewage overflows in Britain;
- As this response is written, stretches of both Lavant and the Ems are virtually dry due to over abstraction;
- The Rother is the most sedimented and eroded river in England and its natural flow is impeded by at least 14 structures.

Here around Petersfield, as elsewhere in the UK National Parks, our water bodies are under severe and growing pressure and are often in poor condition. As well as the damage to biodiversity, water quantity and quality, this reduces their potential to be used and loved by people who live here.

The introductory text correctly mentions the importance of chalk streams (not just Itchen and Meon as mentioned but also the Ems, Lavant and Aldingbourne Rife) and of the Heritage Coast. But there is no mention of the Rother Sub-catchment. This is the only river wholly within the boundaries of the National Park, it is iconic

locally (Liphook, Petersfield, Midhurst, Petworth) and unique in running west-east and being fed from both sandstone and chalk. The Rother is in poor condition due to a complex range of factors including sedimentation, over abstraction, redundant structures, waste water overflows, septic tanks, disconnection of the floodplain and agricultural chemicals. The Rother requires urgent action if it is to become a river worthy of the National Park, and an Action Plan is being pulled together for this purpose.

The wording of Aim 3 implies healthy catchments and aquifers, but the statement would be more powerful and explicit if amended to something like: "Healthy river catchments and aquifers supply clean abundant water so that nature and communities can thrive, and flood risk is reduced."

The two objectives are good in themselves but (as with many other places in the PMP) are different in type. Likewise, the targets muddle means and ends and the WFD target lacks ambition. See Questions 21-26 below for further suggestions.

**Objective 3.1: To support catchment-based partnership approaches to water management so that nature and communities can thrive, and flood risk is reduced.**

21. Do you agree that Objective 3.1 is an appropriate objective that will help to achieve Aim 2 over the next 5 years? *Please highlight your answer.*

- Yes
- No - **SELECTED**

If you answered 'No', please could you explain why?

The section on water (Pages 31-33) is very welcome. The introductory text sets out the challenges well, though Page 30 understates the scale and urgency of the problem, with just one paragraph on the state of our rivers and the pressures on them.

But as drafted the two objectives, and the single targets under each one, are an inadequate response to the scale of the challenge and the need for urgent action by many stakeholders. There seems to be overlap and overreliance on a single mechanism - Catchment-based Partnerships – without describing what these need to actually do and who needs to do it. It is hard to separate out responses to each objective and target. This section could be significantly strengthened to ensure that the two objectives are set at the same level and are each supported by a suite of targets which can deliver them.

Objective 3.1 as written is about giving support to Catchment-based Partnerships (CPs) but also about what these CPs are expected to achieve on the ground. CPs are a pivotal mechanism for improving our rivers, but the existence of CPs -even with more resources – will not be enough to achieve a step change on rivers like (for example) the Rother and its tributaries around Petersfield.

The first part of the objective might be better expressed as a target (or output delivered - see opening section of this response). The latter could then form the Objective. For example: “The condition of our rivers has been significantly improved by the actions of catchment-based partnerships, resulting in cleaner water, more balanced flows, recovering wildlife, and the reconnection of floodplains”.

22. Does Objective 3.1 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

As part of PeCAN's nature recovery programme, we are focusing on the rivers and streams which flow through and near to Petersfield. Sites like the Rotherlands and Goodyer Meadows have been a focus for action with other local bodies such as Western Sussex Rivers Trust and Eco-Rother Action to engage the public, raise awareness and encourage practical volunteering to (remove Himalayan Balsam and monitor water quality).

23. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 3.1? *Please highlight your answer.*

- Yes
- Somewhat
- No - **SELECTED**

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

Objective 3.1 is supported by a single Target (3.1a) which is a bit of a catch-all. Although the role of CPs (Catchment-based Partnerships) is crucial as a mechanism for bringing together all relevant stakeholders, the

PMP ought to be more specific by setting targets about what these stakeholders (ie not just the SDNPA) will need to do if CPs are to be effective in reversing the downward trend in the condition of our rivers. These targets would be a response to the challenges so well described in the introduction on Page 31. For example;

- Amount of advice and support (beyond just FiPL) given to riparian farmers and those in the wider catchment of rivers;
- Progress made through the capital programmes of Southern Water (overspills and abstraction) and Portsmouth Water (over abstraction) as they impact rivers in the National Park;
- The proactiveness of the EA in monitoring river condition, reviewing abstraction licences and accelerating work on structure removals;
- The extent to which developers actually deliver on policies in the SDNPA Local Plan such as those on SUDS or per capita water use;
- Progress made by the Highways Authorities in tackling run-off from roads.

Note that the new water regulator proposed by the Cunliffe Review, if agreed by Government, could have a significant impact on rivers in the National Park before 2031.

**Objective 3.2: To improve the condition of the water environment to ensure enough clean water for nature and people, and water habitats are restored.**

24. Do you agree that Objective 3.2 is an appropriate objective that will help to achieve Aim 2 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

As drafted, Objective 3.2 (improving condition) sits oddly alongside Objective 3.1 (CPs have resources. 3.2 is about the state of the rivers, while 3.1 about the capacity of partners). These are not equivalent things – the latter is a necessary condition to support the former. Hence the suggestion to look again at the whole water section to strengthen it.

25. Does Objective 3.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

26. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 3.2? *Please highlight your answer.*

- Yes
- Somewhat
- No - **SELECTED**

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

Target 3.2a (even in combination with Target 3.1a) does not provide an adequate basis for monitoring progress. Having a “condition” target is certainly welcome. But setting it at 10% improvement in Water Framework Directive (WFD) status is a problem because:

- In a National Park, suggesting that 90% of our rivers will still fail to reach WFD Good status by 2031 seems very unambitious, especially given the level of public concern, the numerous campaigns about water; the publication of the Cunliffe Review etc;
- It needs breaking down. The WFD definitions of ecological and chemical status are each aggregates of a basket of indicators. It might be useful refer more explicitly to some of the features of rivers that contribute – for example levels of nitrates from agriculture or phosphates from sewage, or the extent to which floodplains are reconnected to rivers;
- It is necessary but not sufficient. WFD status is about ecological and chemical condition. These are vitally important, but so do is the extent to which residents and visitors can access and enjoy our rivers for general recreation, wild swimming etc;

A better structure for the water section as a whole might be to have two objectives, with one objective about the improvement in the state of the rivers (biodiversity, naturalness, water quality etc). The second objective about the reduction of the pressures upon them (sewage, agricultural chemicals, abstraction etc). These could then be supported by the three types of “Targets” as suggested in our response to Question 1. For example:

- Changes on the ground - such as km of floodplain reconnected, habitats restored, structures removed, abstraction and pollution reduced etc;
- Stakeholder actions (not SDNPA) – eg investment in Catchment-based Partnerships, grants given to riparian farmers, progress in upgrading waste water treatment works etc;
- SDNPA outputs – work undertaken by rangers, planners, FiPL team etc.

This will make it easier to monitor progress, and allow high level ambition coupled with realism about who needs to do what to achieve it.

### Section 3: People & Place:

Four key aims have been identified to focus collective action for People & Place over the next five years. Each aim has a set of clear objectives that will help us to achieve the overall aim. Each objective has measurable targets that will help us to monitor progress and evaluate success.

#### **Aim 4: Young people will have opportunities to access training and skills to enable them to take action to care for and enhance the National Park.**

**Objective 4.1:** To provide opportunities for young people to take positive action for nature, climate and heritage.

**Objective 4.2:** To support young people on the pathway to green careers.

##### Targets for Objective 4.1

**Target 4.1a:** Number of schools engaged (primary and secondary) both inside and outside the National Park boundary per year (PLTOF Access for All metrics)

**Target 4.1b:** Work in partnership to deliver 125 youth action days taking positive action for nature, climate and heritage in the National Park by 2031

##### Targets for Objective 4.2

**Target 4.2a:** Work with partners to deliver 100 work experience placements, 20 apprenticeships and 10 work placements within the National Park.

27. How far do you agree that Aim 4 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

- **Strongly Agree - SELECTED**
- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:

We like the aim of getting children of all backgrounds into the National Park to build a personal connection with nature. This will build future support for nature restoration and climate mitigation (including future local tourism and 'staycations'), and is in-line with PeCAN's own objectives. It would also support PMP Objective 7.1 (greener economy and visitor experiences).

As well as excursions, this section could refer to activities inside schools, such as the schools outreach being delivered by PeCAN, which aim to build resilience among children for the future effects of climate change and nature loss.



**Objective 4.1: To provide opportunities for young people to take positive action for nature, climate and heritage.**

28. Do you agree that Objective 4.1 is an appropriate objective that will help to achieve Aim 4 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

29. Does Objective 4.1 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

PeCAN will continue to deliver and expand its successful Education Outreach Project into its third year. This Project delivers high-quality, engaging climate education through workshops and assemblies in schools across the western South Downs region. Since launch, the programme has delivered more than 100 assemblies and workshops, equipping young learners with the knowledge, hope, and resilience they need to contribute to climate action. Our Project will deliver: 40 classroom workshops, 20 school assemblies across the 2025-26 academic year. Based on delivery numbers from this year, these could reach up to 4,000 pupils in total, focusing on themes such as sustainability, biodiversity, food, transport, waste, and green careers. Our Project is designed to build resilience among children for the changing climate and world they will live in. We are not aware of any other programmes delivering this service in our area.

In addition, we will work with schools to assist them to build their sustainability goals by helping schools develop relevant policies and Climate Action Plans; by attending school events; speaking at local Head Teacher meetings; and offering CPD (Continuing Professional Development) sessions.

Schools often lack the capacity to deliver in-depth environmental education and PeCAN can help fill this gap with an engaging, local programme rooted in the values of the South Downs National Park: sustainability, stewardship, and community.

PeCAN has built excellent relationships with local schools, who are keen to have us return to deliver to the next cohorts of children. Our proven model of climate education continues to reach more children, and by deepening links with schools will help embed climate confidence in schools who are the heart of our communities.

More information about PeCAN's activities in this area can be found here:

<https://petersfieldcan.org/projects/schools-and-young-people>

30. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 4.1? *Please highlight your answer.*

- Yes
- Somewhat - **SELECTED**
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

We recommend that consideration be given to adding a target to increase the number of organisations that facilitate or host school visits. Currently, excursions probably rely on organisations such as Weald & Downland, Butser Ancient farm, Sky Park, etc but more could join this group with support from the National Park or others; farms, River Trusts, parish councils, etc.

Schools being "engaged" is not defined but the reference to PLTOF Access for All metrics suggests this refers mainly to visits. As above, we suggest it should also count in-school engagements, such as those done by PeCAN.

**Objective 4.2: To support young people on the pathway to green careers.**

31. Do you agree that Objective 4.2 is an appropriate objective that will help to achieve Aim 4 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

32. Does Objective 4.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ- **SELECTED**

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

PeCAN agrees with Objective 4.2 but this is outside the scope of our current activities and beyond our resources. However Objective 4.1 does fit with our focus and activities.

33. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 4.2? *Please highlight your answer.*

- Yes
- Somewhat - **SELECTED**
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

PeCAN supports the idea of broadening access to traditional crafts and skills to new groups.

The term "green careers" is quite broad, which opens up a range of other opportunities. Why not broaden the narrative for this Objective and its target to include occupations that are not necessarily traditional but are definitely green, such as land management and agriculture, low carbon aspects of transport and construction, low carbon heating, circular economy and related manufacture, green tourism, sustainability services etc. This would make the target easier to achieve - even at a higher target level - and would support Objective 7.1 (greener economy and visitor experiences).

## **Aim 5: A valued South Downs is welcoming and accessible to all**

**Objective 5.1:** To improve the accessibility of the National Park to enable everyone to actively travel and connect with nature and cultural heritage.

**Objective 5.2:** To maintain our International Dark Sky Reserve to support nature recovery and improve understanding of and access to dark skies for all.

### Targets for Objective 5.1

**Target 5.1a:** Improve and promote accessibility to and engagement with Protected Landscapes for all (PLTOF Target 9)

#### **Access for All programme metrics:**

**Target 5.1b:** By 2031, deliver 25 kilometres of accessible path

**Target 5.1c:** By 2031, ensure 50 gates/stiles have been made more accessible

**Target 5.1d:** 2,500 visits to the National Park facilitated by funded equipment by 2031

**Target 5.1e:** By 2031, 5 easy access routes for which wayfinding has been newly created or improved

**Target 5.1f:** By 2031, key partners to have considered or adopted the active travel plan.

### Targets for Objective 5.2

**Target 5.2a:** By 2031 – maintain the percentage of the National Park with the highest quality skies of E0 and E1a standard (20 magnitude per arcsecond<sup>2</sup> and above) as defined by International Dark Sky Reserve guidelines

**Target 5.2b:** Work in partnership to reach 1 million people through online and 10,000 people through in-person dark night skies engagement activities by 2031.

34. How far do you agree that Aim 5 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

- Strongly Agree - **SELECTED**
- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:

We firmly agree that sustainable access is important and that this objective should be a high priority. However the supporting text on Pages 14-17 of the Consultation Draft and the text which explains Aim 5 overlooks several significant challenges. We recommend that Aim 5 is adjusted (see below).

Improving access for visitors and residents to enjoy walking and cycling within the Park will reduce premature deaths from obesity and inactivity, and so this should be mentioned in the text.

Figure 6 in the Consultation Draft suggests that the National Park has an extensive network of cycling/walking routes already. A few of the newer routes, such as the Centurion Way, are excellent for everyday journeys. But the quality of many other routes shown is very variable and all too frequently inadequate for utility journeys and families. Bumpy, muddy and partially overgrown tracks may be enjoyed by adventurous mountain bikers but not by families who wish to undertake recreational journeys in the Park or anyone making utility journeys. This

comment applies to the National Cycling Network Routes (Reference 1), as well as some of the strategic and promoted routes on the map. Figure 6 needs more explanation to reflect that in reality the provision of family friendly and accessible routes is very limited and fragmented. Connectivity from market towns and transport hubs can be an issue, while major highways present barriers to access, as the SDNPA has recognised in previous publications.

There is evidence of significant demand for off-road multi-modal routes. The automatic counter on the rural part of the Centurion Way (an SDNPA initiative) has consistently registered a significant number of bicycle journeys per annum, with the higher numbers close to Chichester. The counts of walkers are similar. We look forward to this route being extended to Midhurst and from there - as the Rother Valley Way - to Petersfield and Petworth.

The Consultation Draft underplays the huge pressure on the South Downs from car use. Surface transport is the highest carbon emitting sector. Traffic volumes in the UK have grown steadily over 5 decades and are forecast to keep growing, while the size and weight of vehicles has increased. The overreliance on private motoring has a major impact on both our rural and urban environments in terms of climate change through emissions, air pollution through fine particles, road injuries, urban heat through paved surfaces, noise pollution, social exclusion and many related physical, mental health problems. The impact on wildlife includes fragmentation of habitat, noise pollution, toxic run-off and road kills.

The SDNP and its hinterland are typical of the national trend towards car dependency, with heavier and larger vehicles and the consequent impact on wildlife and people, of emissions, noise, particulates, run-off etc. The “motornormativity” trend (Reference 2) is so insidious that the negative impacts of car dependency are unlikely to have featured much in the SDNPA’s recent stakeholder engagement activities, despite the significant negative impacts of car dependency on the state of the National Park.

Fostering the social and economic wellbeing of the communities within the National Park is one of the statutory Purposes of National Parks, but this is seriously overlooked in both the title of Aim 5 and in supporting text (Pages 38-41). As acknowledged in the Consultation Draft, the SDNP has the largest residential population among all the UK National Parks and includes 4 towns. Some barriers to residents of the SDNPA accessing services and rural areas have been described above. A combination of high speeds, narrow roads, blind bends, limited passing places, debris, and mixed traffic creates more road collisions (Reference 3). This presents a risk to all users, but especially to active travel users.

We appreciated that people with disabilities face additional challenges and we support initiatives to address this. However Objective 5.1 fails to recognise the full extent of the barriers faced by able-bodied people who wish to visit the National Park or make utility journeys in it using active travel modes. In view of the this, we recommend that the title of Aim 5 should also be adjusted. We suggest one of the following:

- Aim 5: Accessibility and connectivity - providing access to the National Park and connecting people with where they want to go in a sustainable manner, or alternatively:
- Aim 5: Access and sustainable travel.

#### References:

1. Paths for Everyone, Sustrans’ review of the National Cycle Network, 2018. Also see: Laura Laker, Potholes and Pavement, Bloomsbury, 2024.
2. Walker et al, Why do cars get a free ride? The social-ecological roots of motonormativity, Global Environmental Change 91 (2025). This journal article is available here: <https://www.sciencedirect.com/science/article/pii/S0959378025000172>
3. HCC, Hampshire Rural Active Travel Guidance, 2024. This is available here: <https://documents.hants.gov.uk/transport/HampshireRuralActiveTravel-guidance.pdf>

**Objective 5.1: To improve the accessibility of the National Park to enable everyone to actively travel and connect with nature and cultural heritage.**

35. Do you agree that Objective 5.1 is an appropriate objective that will help to achieve Aim 5 over the next 5 years? *Please highlight your answer.*

- Yes
- No - **SELECTED**

If you answered 'No', please could you explain why?

We broadly support the objective of improving access to the National Park and enabling active travel, but as worded this objective ignores the social and economic wellbeing of its residents. This may be because the text and some of the associated targets are taken directly from DEFRA's PLTOF policy guidance. The SDNP has a significant resident population, but without using a car many residents face barriers to accessing its rural areas, or the services needed for everyday life. Unless this changes, the ambitious Net Zero target in this plan will not be achieved.

We therefore recommend that this policy Objective 5.1 is re-worded to address the following:

- To clarify that "everyone" includes both visitors and the Park's inhabitants.
- To broaden the scope beyond the accessibility of landscape, heritage, and attractions to include connecting communities to services essential for everyday life.
- To broaden the emphasis placed on active travel in Objective 5 to include modal shift to from cars to public transport.

36. Does Objective 5.1 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

Objective 5.1 aligns closely with PeCAN's activities. There is a strong interest among PeCAN volunteers in making local transport more sustainable, transport being the highest emitting sector of Green House Gases in the UK and a significant problems in the National Park.

As part of our advocacy activities, teams of PeCAN volunteers have given many hours of their time to respond on sustainable transport related topics to public consultations about the following in the last two years:

- The East Hampshire Local Cycling and Walking Infrastructure Plan (LCWIP) prepared by Hampshire County Council and East Hants DC.
- The parts of the Local Plan updates by SDNPA and by East Hants DC related to sustainable transport.
- Public and stakeholder consultations by Hampshire Highways and SDNPA about barriers to active travel.
- Various public consultations about planning applications for new housing and business premises in and around Petersfield. (Local residents are often more aware of existing issues and opportunities around cycling and walking routes than the consultants employed by developers and planning officers).

Early this year PeCAN worked closely with Petersfield Bicycle Buddies to organise an event to promote the use of e-bikes. Petersfield Bicycle Buddies had a strong presence at the last Petersfield Eco Fair which was organised by PeCAN and Petersfield Town Council.

37. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 5.1? *Please highlight your answer.*

- Yes
- Somewhat
- No - **SELECTED**

Resources should be focussed on where they can be most effective, especially in view the ongoing budget pressures and the variations in geographic character around the National Park. For some targets, this could be achieved by either naming the paths/trails/routes to be improved. Alternatively maps could be used to indicate the areas to be targeted, as they have been in the Northumberland National Park Management Plan.

It is unclear whether the SDNPA will be delivering the Targets or whether it will be primarily delivered by an unspecified “partner”. Providing more details would give stakeholders greater confidence that there is a shared commitment to achieving the Targets. This topic is discussed at length in our response to Question 1).

The scope and focus of the six targets is too narrow and it appears to be dependent on a single funding stream (DEFRA’s Access for All Programme). Other funding streams are likely to be available and relevant (for example from various DFT programmes). Widening the scope of these targets will de-risk the SDNPA’s delivery and more fully address the needs of the resident communities and visitors.

Targets should be added to address the following challenges:

- The poor condition of many of the cycling and walking routes. The Park Authority should work with Partners to investigate or audit the condition of these routes and where appropriate, plan improvements.
- Connectivity from market towns into the surrounding countryside and to the services needed for everyday life within towns and villages. Connectivity analysis should be undertaken on all large settlements within the Park using web/PC tools and then plan/policies devised to address this issue (ATE’s guidance material and their tools are relevant).
- The pressure on the Park from high levels of traffic. This significant and difficult problem needs a variety of actions and measures.
- Improvements to public transport services into and within the National Park.
- A clear commitment to extend the Centurion Way and the related off-road multi-modal routes which were identified as aspirations in 2017, in particular the Rother Valley Way.

These are significant omissions, but we also recognise that the ongoing funding crisis within county councils may be a constraint. We also appreciate that the funding landscape for active travel is fractured and this introduces uncertainty about delivery. However it is preferable to identify Targets that are in proportion to the scale of the considerable challenges, albeit with caveats around the deliverability, rather than to gloss over the scale of the challenges and to set ineffective Targets.

Target 5.1a: this target should be clarified. We guess that it means that the SDNPA plan to apply for grants from DEFRA’s Access for All funding Programme for capital projects to be used for schemes to improve access for those with limited mobility to sites, or trails, within the National Park.

Target 5.1b: this target is open to a variety of interpretations. Does this target refer to totally new paths, or to improved paths? Are these paths for walkers or multi-modal paths? Will this be small fragments of path or a substantial lengths that allow people to travel to useful destinations? Will these 25 kms be delivered by the SDNPA or by another local authority?

Target 5.1e: the phrase “easy access route” is open to a variety of interpretations and should be clarified. We are concerned that this target could have little impact, depending on how it is interpreted, and may do little to address the numerous barriers that discourage walking and cycling in the National Park.

Target 5.1f: We support the approach of planning the delivery of a network of active travel routes in the National Park for recreation and daily utility journeys, but without a formal title etc it is not possible for the

reader to identify this document, its content, status, purpose etc. Hence this objective is not understood and lacks credibility.

**Objective 5.2: To maintain our International Dark Sky Reserve status to support nature recovery and improve understanding of and access to dark skies for all.**

Do you agree that Objective 5.2 is an appropriate objective that will help to achieve Aim 5 over the next 5 years?  
*Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

38. Does Objective 5.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes
- No - this objective isn't relevant to my organisation - **SELECTED**
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

39. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 5.2? *Please highlight your answer.*

- Yes
- No
- Somewhat

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

**Aim 6: Cultural Heritage is conserved, understood, valued, created and passed on for future generations.**

**Objective 6.1:** To enhance the cultural heritage of the National Park and tell its diverse stories as a dynamic and ever-changing landscape.

**Objective 6.2:** To support partnerships that enable people to connect to the landscape and its special qualities through creative arts and heritage.

Targets for Objective 6.1

**Target 6.1a:** Decrease the number of nationally designated heritage assets at risk in Protected Landscapes (PLTOF Target 10).

**Target 6.1b:** 115 scheduled monuments to have enhanced records by 2031.

**Target 6.1c:** By 2031, to have increased the number of heritage assets covered by agri-environment schemes

Targets for Objective 6.2

**Target 6.2a:** Work in partnership to support 150 number of participants through creative arts/heritage mechanisms in the National Park by 2031 (set baseline based on previous 5 years of delivery)

**Target 6.2b:** Provide advisory input into 25 creative arts and heritage Projects in the National Park by 2031

**No answers submitted for Aim 6.**

40. How far do you agree that Aim 6 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

- Strongly Agree
- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:



**Objective 6.1: To enhance the cultural heritage of the National Park and tell its diverse stories as a dynamic and ever-changing landscape.**

41 Do you agree that Objective 6.1 is an appropriate objective that will help to achieve Aim 6 over the next 5 years? *Please highlight your answer.*

- Yes
- No

If you answered 'No', please could you explain why?

42. Does Objective 6.1 align with your organisational strategy or delivery plans?

- Yes
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

43. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 6.1? *Please highlight your answer.*

- Yes
- Somewhat
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

**Objective 6.2: To support partnerships that enable people to connect to the landscape and its special qualities through creative arts and heritage.**

44. Do you agree that Objective 6.2 is an appropriate objective that will help to achieve Aim 6 over the next 5 years? *Please highlight your answer.*

- Yes
- No

If you answered 'No', please could you explain why?

45. Does Objective 6.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

46. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 6.2? *Please highlight your answer.*

- Yes
- Somewhat
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

## **Aim 7: A thriving rural economy and local communities sit at the heart of the National Park**

**Objective 7.1:** To support the growth of a greener economy across the National Park while providing outstanding visitor experiences that benefit our communities and landscape.

**Objective 7.2:** To support the needs of local communities through affordable, accessible and low-carbon housing.

### Targets for Objective 7.1

**Target 7.1a:** 5% Growth in Green Economy by 2031 from 2024 baseline

**Target 7.1b:** Support Local Visitor Economy Partnerships (LVEPs) to achieve Tourism GVA growth by increasing Tourism £GVA within the SDNP by 25% by 2030 from 2024 baseline.

**Target 7.1c:** Visitor experience: 99% of visitors to rate their enjoyment of the National Park as “high” or “very high”

**Target 7.1d:** Income from visitor giving to increase by 100% by 2031

**Target 7.1e:** Promote and connect sustainable business through growing the Our South Downs business network to over 700 members by 2031

**Target 7.1f:** 50% increase in the number of B Corp. within the SDNP from 2024 baseline

### Targets for Objective 7.2

**Target 7.2a:** 300 affordable dwellings to be completed by 2031 (60 per year).

**Target 7.2b:** Extant permission for 500 affordable dwellings granted by 2031 (100 per year).

**Target 7.3c:** Extant permission for 1,000 accessible homes to be granted by 2031.

47. How far do you agree that Aim 7 is a priority for the National Park for the next 5 years?

*Please highlight your answer.*

- Strongly Agree - **SELECTED**
- Agree
- Neutral
- Disagree
- Strongly Disagree

If you'd like to explain your answer, please do so here:

We support the idea of a sustainable local economy and resilient communities. As well as being valuable in their own right, they are needed for a successful response to the nature and climate change challenges facing the National Park.

There could be more in the text about the risks and opportunities of increasing tourism. For example, on the opportunity side, more South Downs tourism could help to reduce emissions if it displaces higher emission holidays, such as those involving air travel (the Small World Consulting report 2022 says that residents of the SDNP have emissions from flying nearly three times higher than for an average UK resident). Aim 7 could thus help to support Aim 2's net zero 2040 target if it encourages people to replace short-haul and long-haul foreign holidays with stays in the National Park. In practice, that would mean encouraging more options for city breaks / short stays and family holidays in the Park, preferably using sustainable travel (in line with Aim 5).

On the risks side, the experience of Cornwall and Devon shows that an excessive reliance on seasonal tourism can make local economies fragile and wasteful, leaving areas with underused resources in winter and a reliance on part-time seasonal jobs; these risks could be mitigated to some extent by promoting more year-round visits.

**Objective 7.1: To support the growth of a greener economy across the National Park while providing outstanding visitor experiences that benefit our communities and landscape.**

48. Do you agree that Objective 7.1 is an appropriate objective that will help to achieve Aim 7 over the next 5 years? *Please highlight your answer.*

- Yes - **SELECTED**
- No

If you answered 'No', please could you explain why?

49. Does Objective 7.1 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

PeCAN's strategy and plans has included engaging with businesses to promote sustainable business practices, for example by promoting the Our South Downs network, Green Accreditation scheme, offering free carbon footprints, and sponsoring a Green Business of the Year award. See <https://petersfieldcan.org/projects/business-support>.

50. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 7.1? *Please highlight your answer.*

- Yes
- Somewhat - **SELECTED**
- No

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

Target 7.1a: The 5% target looks too low. We hope that green economy will be broadly defined and not limited to a narrow definition of businesses in sustainability or traditional crafts. In particular, there needs to be a focus on jobs and businesses that can make the biggest contribution to the low carbon transition given the source of most of the Park's emissions, such as automotive or heating engineers who wish to move into the EV and heat pump markets, buildings owners and fleet operators who wish to reduce emissions, or farmers and land managers who adopt regenerative practices. The text could be amended to show that achieving the 2040 net zero goal will need the majority of businesses in the Park to become sustainable in a net zero sense by 2040.

Target 7.1b: We support a tourism growth target but think the wording could be improved. The VisitEngland guide to LVEPs promotes sustainability and accessibility but leaves the delivery detail to partners, so these words need adding to the target. As mentioned above, tourism growth should include promoting year-round visits to avoid an over-reliance on seasonal summer trade and seek to displace high-carbon holiday options, including flying. We propose editing the target as follows: "Support Local Visitor Economy Partnerships (LVEPs) to promote sustainable and accessible year-round tourism by increasing Tourism £GVA within the SDNP, including as a destination for family holidays and short breaks, by 25% by 2030 from 2024 baseline."

Target 7.1f: We support the target of increasing B Corp certification for larger businesses in the Park, which often have a larger environmental impact. Implementation could encourage businesses that use the ISO 14000 framework to upgrade to B Corp.

However, some smaller businesses have told us that B Corp is too expensive for them. B Corp fees excluding VAT for businesses with less than £150k turnover are £1,000 a year plus £560 for initial accreditation, or £1250 a year plus £920 initial accreditation for businesses with turnover up to £500k, which we assume describes the large majority of South Down businesses today. The Our South Downs network and Green Accreditation initiatives are more suitable for these businesses, where owners are environmentally minded.

An additional target for SME business owners could be considered, perhaps around working with Local Authorities or LVEPs to develop incentives (via Business Rates?) to measure GHG emissions, with technical support from SDNPA partners. That might help to raise awareness of sustainability benefits among less environmentally minded business owners.

**Objective 7.2: To support the needs of local communities through affordable, accessible and low-carbon housing.**

Do you agree that Objective 7.2 is an appropriate objective that will help to achieve Aim 7 over the next 5 years?  
*Please highlight your answer.*

- Yes
- No - **SELECTED**

If you answered 'No', please could you explain why?

The target mentions housing but not commercial, industrial and public sector buildings. This could be addressed by replacing the word “housing” with “buildings”.

We agree that there is a need for more affordable, accessible, and low-carbon housing in the Park. We also agree that well-designed low-carbon housing can ease the cost of living by reducing energy bills.

The amount of low-carbon housing could be increased through two measures. First, by using the emerging Local Plan to ensure that new homes are built to a high standard of energy efficiency and with limited embodied emissions, in line with the excellent draft policy SD48 in the emerging Local Plan. Second, and much more impactful in terms of numbers, would be to support the retrofitting of existing homes, which greatly outnumber new homes.

Objective 7.2 and its targets should therefore be amended to refer to buildings rather than housing, and the text amended to include references to supporting the retrofitting of existing buildings as well as implementing the sustainable construction policies in the emerging Local Plan.

Increasing the number of affordable homes is harder as most of the policy levers lie with central government. The Park is responsible for planning and has a new build target for residential homes more than 50% above underlying housing need, as a result of the so-called “Standardised Method” (HEDNA 2023). However, the construction of new homes in the private market has a surprisingly small effect on affordability, which is driven by a range of factors in addition to supply. Studies including from the OBR show only a marginal impact from new builds on house prices and rental values (see references below).

The term Affordable Homes is defined relative to market prices not incomes, so it would be possible to deliver homes that are technically “Affordable” without them being affordable in reality.

Given these criticisms of the focus on affordable homes, we suggest that more impactful ways for the Park Authority to improve affordable housing provision would be to encourage downsizing by empty-nesters, as the Park has a higher-than-average proportion of under-occupied homes (HEDNA 2023), and to encourage the creation of more social housing, as opposed to affordable housing.

The Park Authority could use its planning powers to (i) encourage the construction or conversion of more smaller housing units from within its existing housebuilding targets in order to enable downsizing, and (ii) to support Housing Associations and local authorities wanting to create more social housing.

**References:**

1. A new report from UCL and others explains the variety of factors affecting housing unaffordability: Horn, S., and Stratford, B et al. (2025) Taking Stock: a foundation for Future Housing Strategy. Homes that Don't Cost the Earth <https://darkmatterlabs.notion.site/hdce-takingstock>
2. The Office of Budgetary Responsibility reported in March 2025: “We expect the 0.5 per cent increase in the housing stock as a result of the [government’s] planning reforms will reduce the average house price by around 0.8 per cent in 2029,” [https://obr.uk/docs/dlm\\_uploads/OBR\\_Economic\\_and\\_fiscal\\_outlook\\_March\\_2025.pdf](https://obr.uk/docs/dlm_uploads/OBR_Economic_and_fiscal_outlook_March_2025.pdf), page 48.
3. The Joseph Rowntree Foundation reported in 2023 “The relationship between market rents and additional housing supply is too weak for affordability to improve more than marginally at any plausible rate of building,” <https://www.jrf.org.uk/housing/housing-affordability-since-1979-determinants-and-solutions>.

51. Does Objective 7.2 align with your organisational strategy or delivery plans? *Please highlight your answer.*

- Yes - **SELECTED**
- No - this objective isn't relevant to my organisation
- No – this focus is relevant to my organisation but our objectives differ

If you'd like to explain your answer, or share a URL/link to a relevant document, please do so here:

PeCAN's strategy targets an overall reduction in emissions from housing, which mainly arise from heating with fossil fuels and from the carbon emissions embodied in the construction of new homes. Improving the carbon emissions and affordability of homes fully aligns with our strategy. More information of our activities in this area can be seen here: <https://petersfieldcan.org/projects/home-energy>.

52. Overall, do you agree that the targets identified will help to monitor and demonstrate progress towards this Objective 7.2? *Please highlight your answer.*

- Yes
- Somewhat
- No - **SELECTED**

If you wish to explain your answer, or if you have alternative suggestions for targets, or how the objective could be measured, please tell us here:

**AFFORDABLE.** We are sceptical that "Affordable Homes" as currently defined will result in more affordable housing and suggest some alternative targets that could make housing more affordable. Possible new targets to improve affordability:

- Target new-builds towards smaller housing units designed specifically to encourage "empty-nesters" to downsize.
- Target the support of Housing Associations and Local Authorities to create more social housing.

**LOW CARBON.** There are no targets for low carbon homes; here are three suggestions:

- Reduced GHG emissions from housing. Most housing emissions are from heating fuels so a target could be compiled from national data, for example using gas or other fossil fuels supplied through domestic meters in the Park <https://www.gov.uk/government/statistics/lower-and-middle-super-output-areas-gas-consumption>. As an illustration, the two 'Middle Layer Super Output Areas' that make up Petersfield - East Hampshire 011 and East Hampshire 012 - together saw a 15% decline from 92,183,098 kWh in 2020 to 79,043,523 in 2023, for about the same number of meters. Other government data could be used to help interpret that, such as the number of heat pumps installed, as well as weather and energy price data. As the outcome is hard for the Park to control but is a core component of achieving the 2040 net zero goal, the Target could either be to monitor and publish this data, or to try to reduce it.
- Adopt and enforce the emerging Local Plan's sustainable construction policies on operational and embodied emissions (SD48).
- Target an increased number of qualified heat pump engineers working in the National Park area.

**ACCESSIBLE.** Regarding accessibility issues for people who are less mobile. We recommend that the term "accessibility" is more broadly interpreted than in Building Regulations Part M4, which does not look outside property boundaries and assumes that travel is vehicle based. For older and disabled people, the quality of the pavements and paths is important, if not critical (adequate width, smooth surfaces to accommodate wheelchairs

and walkers, etc). Increasingly, the disabled and elderly are using bespoke designs of cycle/e-bike. The role of cycling as an aid to mobility is often overlooked. We recommend that consideration be given to adding a relevant Target, for example:

- Adopt and enforce DfT's Local Transport Note (LTN) 1/20 and the relevant parts of DfT's Guide on Inclusive Mobility (2021) within sites that provide accessible homes. See <https://www.activetravelengland.gov.uk/resources/active-travel-design>
- At the site selection stage of sites for accessible housing adopt the use of Active Travel England's Planning Application Assessment Toolkit regardless of the size of the development. See: <https://www.activetravelengland.gov.uk/planning>

TRANSPORT AND SPATIAL PLANNING. Unless it is possible to travel to new homes by sustainable means, new housing will cause carbon emissions to rise. The transport sector is the biggest emitter of greenhouse gases in the UK. The National Park has higher than average transport emissions (source: Small World Consulting Report 2022). Recent studies at national level show that a large number of new housing developments in England are poorly connected to existing public transport networks with little and with poor access to the amenities need for everyday living.

PeCAN closely followed the recent public consultations of the East Hants Local Plan, the South Downs Local Plan, the Hampshire Local Transport Plans and the East Hampshire LCWIP and also reviewed many planning applications. We observed that only patchy information is available locally to inform the Site Selection process about the availability of public transport and the adequacy of walking and cycling connections quality of walking facilities. On occasions we have observed that opportunities have been missed to coordinate the activities of land use planners and transport planners.

People need homes where sustainable transport infrastructure is ready at the outset. Building homes first and considering connectivity later will simply entrench car dependent behaviours.

Two recent events may provide opportunities for progress in this area. First the reorganisation of local authorities in both of Hampshire and West Sussex, with the introduction of new mayors, may offer new opportunities to partners with transport authorities. Secondly the Department for Transport (DfT) recently they launched their new Connectivity Tool, which is designed to help local authority experts and others to understand the connectivity of places in England, see <https://www.gov.uk/guidance/connectivity-tool>

The Park Authority should engage with other local authorities to use computer tools and data to refine information about the locations which are sustainable in transport terms and to better inform the land use planning process about the best locations for development and to identify the most effective measures for improving connectivity. In the future, targets should be set for the number of sustainably connected houses to be completed. We recommend that the scope of Objective 7.2 be widened and that consideration be given to including some relevant Targets, for example:

- Review and refine the planning procedure so that opportunities are actively sought to create, improve and protect walking and cycling routes in urban and rural locations for both commuting and leisure purposes throughout the planning process but especially in the early stages of planning the development of a site.
- Producing and deliver an agreed Local Cycling and Walking Infrastructure Plan (LCWIP) for the South Downs and the gateway settlements.
- Through working with partners, promote a connected and sustainable public transport and active travel network throughout the National Park and the gateway settlements.

Reference on Spatial Planning:

This is just one example of many publications on this topic: Transport for New Homes, What is being Built in 2025 ? In search of the Station, see <https://www.transportfornewhomes.org.uk/wp-content/uploads/2025/03/What-is-being-built-in-2025-In-search-of-the-station.pdf>



## Section 4: Planning Principles

**PLANNING PRINCIPLE 1:** We will support development that is landscape-led, follows regenerative development and design principles and has an overall positive impact on landscape character, natural ecosystems and biodiversity.

**PLANNING PRINCIPLE 2:** We will support development proposals that protect and take opportunities to enhance designated sites, support protected species, follow the mitigation hierarchy and take opportunities to deliver bigger, better and more joined up nature.

**PLANNING PRINCIPLE 3:** In implementing biodiversity net gain, we will seek to ensure that enhancements to biodiversity are appropriate to their landscape, cultural and ecological context, and that any off-setting of negative impacts takes place within the National Park to ensure that it meets the Purpose 1 requirement to conserve and enhance the wildlife.

**PLANNING PRINCIPLE 4:** We will support proposals for small scale renewable energy schemes that are appropriately located and designed, especially where such proposals are community-led and serve communities and businesses within the National Park.

**PLANNING PRINCIPLE 5:** We will support new development and the retrofitting of existing development, that achieves net zero operational carbon, minimises embodied carbon, utilises sustainable materials that support the circular economy, and is resilient to the impacts of climate change.

**PLANNING PRINCIPLE 6:** We will support a catchment-based approach to water and wastewater management that protects and enhances surface and groundwater quality, restores natural functions and processes, uses nature-based solutions to manage flood risk, and enhances public access to blue infrastructure.

**PLANNING PRINCIPLE 7:** We will support water efficiency measures and more sustainable patterns of water use to protect our water supply, aquifers, rivers and the habitats and species that depend on them.

**PLANNING PRINCIPLE 8:** We will support the provision of facilities and infrastructure that enable the delivery of training and education for young people.

**PLANNING PRINCIPLE 9:** We will support development that improves the accessibility of the National Park, reduces car travel and facilitates sustainable modes of transport including active travel through better and new public rights of way and access land, safe and attractive pedestrian and cycle routes and improved public transport.

**PLANNING PRINCIPLE 10:** We will protect and enhance the tranquillity and dark skies of the National Park by supporting development that avoids unnecessary light pollution and utilises good design to mitigate the impact of any lighting and glazing.

**PLANNING PRINCIPLE 11:** We will support development that recognises the significance of the cultural heritage of the National Park, conserves and enhances heritage assets and improves their ongoing management, especially where they are 'at risk'.

**PLANNING PRINCIPLE 12:** We will support green economic growth that enables regenerative land management, particularly farming and forestry, provides local employment, and supports the production and sale of sustainable food, drink and other products of the National Park.

**PLANNING PRINCIPLE 13:** We will support development that provides visitor experiences that benefit our communities and landscape, encourages the use of the National Park as a place for healthy outdoor activity and relaxation and supports a regenerative visitor economy.

**PLANNING PRINCIPLE 14:** We will support development that enhances the role of towns and villages as social and economic hubs and improves access to essential community services, infrastructure and facilities, especially where this is community-led.

**PLANNING PRINCIPLE 15:** We will support development that provides affordable housing that meets the needs of local communities in perpetuity and explore innovative ways of increasing delivery, including through community-led development, exception sites and Whole Estate Plans.

**PLANNING PRINCIPLE 16:** We will support new homes that increase the stock of smaller dwellings, improve people's health and opportunities, are accessible and adaptable, and meet the diverse needs of our communities throughout all life stages.

53. If you wish to comment on any of the planning principles, please use the space below, making sure you refer to the relevant principle in your answer.

## Section 5: General Principles

**GENERAL PRINCIPLE 1:** We will prioritise nature recovery that achieves multiple benefits and favour natural functions. We will create bigger, better managed and more connected areas of habitat in and around the National Park.

**GENERAL PRINCIPLE 2:** We will support farm businesses to access and maintain agri-environment schemes that deliver ecosystem services on the ground, encouraging those that will support regenerative farming, and to access nature-based solutions schemes to deliver nature recovery and climate mitigation.

**GENERAL PRINCIPLE 3:** We will enhance the landscape, connect habitats, store carbon and manage flood risk through naturally regenerated woodland and tree planting, ensuring the right tree in the right place.

**GENERAL PRINCIPLE 4:** We will support activities that give the public a chance to learn more about farming and the important benefits it provides – high-quality food, recreation, wellbeing, nature conservation, the historic environment, landscape and a thriving rural economy.

**GENERAL PRINCIPLE 5:** We will protect the qualities and character of the Heritage Coast.

**GENERAL PRINCIPLE 6:** We will raise awareness of the importance of chalk streams and rivers and support their restoration and rehabilitation.

**GENERAL PRINCIPLE 7:** We will promote and encourage the responsible use of the National Park to enhance the health and wellbeing of residents and visitors.

**GENERAL PRINCIPLE 8:** We will support the conservation and enhancement of the historic and cultural environment of the National Park and its adaptation to climate change through best practice guidance, promoting an uptake in green skills and the use of suitable sustainable materials.

54. If you wish to comment on any of the general principles, please use the space below, making sure you refer to the relevant principle in your answer.

## Section 6: Using the PMP

55. Do you think the proposed Partnership Management Plan will be of use to your organisation? *Please highlight your answer.*

- Yes - **SELECTED**
- No

To help us improve and learn, we'd be interested to understand the reason for your answer.

This document is in broad alignment with PeCAN's strategy and our charitable objective, which is the "advancement of environmental protection for the public benefit through community-led initiatives that mitigate climate change and minimise biodiversity loss for the benefit of residents and the general public in and around the Petersfield area." (Our strategy and constitution are both available at: <https://petersfieldcan.org/about-us>)

PeCAN's mission is to help Petersfield and surrounding village communities reduce their carbon emissions and protect nature. Our vision is for the Petersfield area to become carbon neutral as quickly as possible.

PeCAN has benefited from a close working relationship with and strong support from the SDNPA. We appreciate this and hope it will continue, as we provide a link between the ambitions of the PMP and the local community which can help make these a reality, and can give feedback on how effective the PMP in helping our community in its own ambition to be more sustainable.

To this end we would like to take the opportunity to meet the SDNPA team drafting this plan, and would also suggest that the network of CANs or their equivalents across the NP (eg WinACC, ACAN etc) should have a seat on any partnership formed to help deliver it. There are a number of areas where we feel that the Consultation Draft should be improved and we have summarised these in our answer to Question 61 below.

56. Please tell us if, or how, the South Downs National Park Authority can support you to celebrate and/or communicate your achievements.

There are a number of ways that the SDNPA could support PeCAN in terms of communications and awareness, for example:

- Providing a link to our website from yours;
- Including PeCAN as a local contact in any information about climate action or nature recovery;
- Featuring PeCAN work in any communications to the South Downs Volunteer Rangers;
- Giving us advance notice of media work relating to climate action or nature recovery so that we can amplify the message in our local media by giving it a Petersfield context;
- Featuring PeCAN and its work in South Downs News and the monthly e-newsletter.

57. Please tell us how else can South Downs National Park Authority support you regarding the 2026-2031 PMP.

The SDNPA could support PeCAN regarding the PMP in several ways:

- Ensure that climate mitigation and adaptation and nature recovery are front and centre in the new PMP, tying in with an ambitious Local Plan, Climate Strategy, Climate Action Plan and South Downs LCWIP (Local Cycling and Walking Infrastructure Plan).
- Include in-school climate and nature outreach activities, such as those delivered by PeCAN with support from SDNPA, in Aim 4.

- Include community climate groups in the Delivery Partnership.
- Continue to support the development of new and existing community climate groups.

## Section 7: General Questions

58. Please tell us how far you agree with the following statements by putting **X** in the relevant box:

	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
The Plan is easy to read	<b>X</b>				
The Plan is easy to navigate					<b>X</b>
The Plan is easily understood				<b>X</b>	

If you have any suggestions for how we can improve the accessibility of the plan, please tell us here:

We are delighted to see the new draft PMP. It is very readable, and it is especially encouraging to see new sections on climate change and on water, both of which are very relevant to the Petersfield area of the National Park, along with the increased ambition on nature recovery. The descriptions of the objectives and aims are easy to read and understand, which is an achievement as a lot of factual information is conveyed. However readers would find this document easier to navigate if a table of contents was provided. It may be helpful if this was supplemented by a table at the back which set out each theme, aim, objective and target, together with a brief explanation in the first few pages of the hierarchy of themes, aims, objectives and targets.

Regarding the third question in the table above. Most of this document is easily understood, but there are some weaknesses that detracted from our understanding of this Consultation Draft. This comment is explained in the response that we have provided in our response to Question 1.

The text within Figure 2 is difficult to read because it is too small, likewise Figure 6.

59. What format of the PMP would be most useful to you? *Please highlight any answers that apply.*

- Full printed document - **SELECTED**
- Full online document available for download - **SELECTED**
- Printed short summary/pocket guide- **SELECTED**
- Video clips
- Anything else?

60. Would you like to meet with someone at the South Downs National Park Authority to discuss your feedback?  
*Please highlight your answer.*

- Yes- **SELECTED**
- No

If you answered yes, please confirm the name and contact details of the contact(s) below and we will be in touch to arrange a meeting.

Mr Andrew Lee

Email: [andrew.lee@Petersfieldcan.org](mailto:andrew.lee@Petersfieldcan.org)

Mr Greg Ford

Email: [greg.ford@Petersfieldcan.org](mailto:greg.ford@Petersfieldcan.org)

61. If you have any further comments you wish to share about the draft Partnership Management Plan, please do so here:

We have provided some general comments about the Consultation Draft in our response to Question 1.

The End