



The countryside charity
Sussex

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Mr Matthew Poole
WEP Project Manager
Brighton and Hove City Council
By email : citydownlandestateplan@brighton-hove.gov.uk

2nd March 2021

Dear Mr Poole

City Downland Estate Plan – Have your Say

This is the formal response of CPRE Sussex – the Sussex Countryside Charity - to the above consultation. CPRE Sussex works to enhance, promote and protect the Sussex countryside and the ability of local communities to enjoy and value the natural world.

CPRE Sussex is part of the Brighton Downs Alliance (BDA) and we fully support the BDA's Position Statement of Feb 2021. These are our additional comments.

We welcome the Council's decision to create a Whole Estate Plan for the 12,800 acres of Brighton and Hove's rural estate. This presents a huge opportunity for the wider community benefits of this estate to be realised. The Downland Estate is a very significant public resource for the people of Brighton and Hove and visitors from other areas. It does and can do much to sustain and improve the health and wellbeing of members of all the diverse communities in the area provided that the different parcels of land are themselves managed sustainably and with due regard to the underlying soil type, geology and geomorphology.

We have already responded to the on-line consultation (see pdfs attached). We felt that structuring the consultation around themes which could be prioritised was a limiting approach. Co-benefits should be established and explored; for example, improving soil management can reduce flooding, improve nutrient recycling, increase stored carbon, improve water quality and reduce erosion and pollution. It is on the areas of synergy where the greatest focus should be placed.

We would like to make these additional points to emphasise what we believe might be helpful in guiding estate management at a time when our climate is changing and the value of open and green spaces has become ever more apparent.

The following sets out the main points we hope might help guide estate management:

Accounting for nature – underlying principles for estate management that improves health and wellbeing to all

To promote, enhance and protect a thriving countryside for everyone's benefit

President: Lord Egremont

Campaign to Protect Rural England Sussex Branch CIO | Registered charity number: 1156568

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- Recent research in Sussex has shown that for groups that do not commonly make use of green space, making such spaces accessible for activities of a nature-based and culture-based kind can bring a return on investment of £32 for every £1 invested.¹ The management plan must incorporate addressing issues of access for these groups which have a diverse social composition. The Sussex Local Nature Partnership Health and Wellbeing group could assist in delivering these benefits. A reduction in journeys by car into the Downland from the city could be achieved with better access across the A27 and awareness of routes. It is particularly disappointing that there is no 'land bridge' from Toads Hole Valley to enable better access for people and wildlife into the Downs, funding should be sought to remedy this. Statutory open access land designation across the estate would create co-benefits from increased engagement with the downland.
- The management plan must be consistent with the Local Plan of the SDNP as this is very forward looking as it based on the ecosystem services concept and sustainable use of natural capital.
- A natural capital account for the estate could be a leading-edge development especially if it included the value of the aquifer to the community (little is more valuable than water that could be in less plentiful supply under climate change). Such an account would be an addition to existing forms of accounting for market-based goods and services – it would help estimate the true value of the estate to the people of Brighton and visitors.²
- The management plan might align itself as far as is practicable with the Natural Capital Investment Strategy of the Sussex Local Nature partnership. This is available as indicated in our online response. Such alignment could have some aspirational elements.

Management practices – delivering a sustainable estate resilient to a changing climate

- There will be no one set of prescriptive actions that can be applied to the whole estate.
- Practical management options must be considered in the light of whether the land is open chalk grassland or could be such. We would like to see a commitment to restoring and connecting the chalk grassland across the estate in line with proposals from the Brighton Downs Alliance.
- Chalk grassland is a very rare habitat nationally and internationally and needs to be managed and grazed appropriately to maintain it. Chalk grasslands are valuable because of their diverse flora and fauna. Widespread tree planting on such soil type is likely to be inappropriate and would change the landscape character. Although some hedgerows might be useful to link habitats, if trees are planted they must be of the right type in the right place.

¹ <https://discovery.ucl.ac.uk/id/eprint/10065416/>

² For example, the ONS has produced a natural capital assessment of peatlands as an asset in the billions for water supply and in the hundreds of millions for the water supply as an ecosystem service annually in the £ billions²; chalk aquifers similarly should have their value assessed.

- Land should be managed to ensure water resources can be managed sustainably so that flooding can be minimised (this includes all types of flooding – from rivers and the sea and from both groundwater and surface water types). Synthetic fertiliser and pesticide use should be minimised/banned on chalk grassland or chalk soils overlying the aquifer to avoid needless cost on cleaning up pollution.³
- Estate management should bear in mind that many of the soils of the estate are less suitable as carbon stores for combatting climate change. Carbon storage should be focussed on appropriate areas such as the Weald, with its large-scale modern woodland loss and off-shore by planting kelp to boost the biosphere reserve’s biodiversity and functionality (this could help boost local fishing and enhance local diets). Although off-shore action is beyond the scope of the WEP, in terms of the City meeting its Net Zero target, the focus should not all be on the Downland Estate alone for carbon sequestration.
- Farming on the estate should be as sustainable and as democratic as possible and support cooperative and community-based forms of farm business. The nature of farming will change post-Brexit (to reflect government priorities and the nature of future funding) and the management plan must emphasise the delivery of public goods and service delivery to attract financial input from government.⁴ This shift in emphasis is a great opportunity for farming especially when it can involve such rare habitats and world-renowned landscape. Some opportunities for re-naturalisation (say, of catchments) may present themselves if not re-wilding as such. Nature should be seen as part of sustainable productive farming – not necessarily its opponent. The new Environmental Land Management Scheme (ELM) offers opportunities for nature restoration and addressing climate change once in effect from 2024. How can the council encourage farmers (both the ¾ of the estate with Agricultural Holdings Act tenancies and the ¼ of the Estate with Farm Business Tenancies) to transition to direct payments for public goods, particularly in relation to agroecological and regenerative⁵ approaches?

³ We advocate reversion to grassland (and using ELM funding) to restore grassland on chalk soils OR agroecological approaches to reduce use of agri-chemicals to improve water quality.

⁴ The Agricultural Transition Plan eg p6 to shows how this would fit with a new vision for the Downland : “On 1 January 2021 the agricultural transition period will start. Between 2021 and 2027, we will gradually reduce and then stop untargeted Direct Payments. We will invest the money that we free up to support agriculture in different ways. We will pay farmers to improve the environment, improve animal health and welfare, and reduce carbon emissions. There will be three levels of support aimed at paying for sustainable farming practices, creating habitats for nature recovery and making landscape-scale change such as establishing new woodland and other ecosystem services.”

⁵ <https://pdf.euro.savills.co.uk/uk/rural---other/spotlight---regenerative-agriculture-2021.pdf>

- Landscape Recovery is one of the three components of the Environmental Land Management scheme.⁶ Landscape Recovery will support the delivery of landscape and ecosystem recovery through long-term, land use change projects, including projects to restore wilder landscapes in places where that is appropriate, large-scale tree planting and peatland restoration projects. These projects can deliver a wide variety of environmental outcomes and support local environmental priorities while making an important contribution to national targets. The Department for Environment Food and Rural Affairs has launched a notice of intent to publish a third call for Environmental Land Management Tests and Trials proposals to contribute to the design of the new Landscape Recovery component. We would urge the Council to engage with Defra to explore these opportunities more fully. Joining up the fragmented areas of chalk grassland with each other within the estate and linking also to major areas of SSSIs to the north east for example may be a project of interest. Government has talked before about the Landscape Recovery component having public access as an aspect – also very positive in this context.
- The Council should be an exemplar in demonstrating community-led climate and nature friendly farming, and for community access and involvement. One opportunity for funding to achieve this could be the New Entrants Support Scheme which will open in 2022.⁷ It aims to provide funding to create opportunities for new entrants to access land, infrastructure and support to establish successful and innovative businesses working with Council Farms and other landowners. It may develop in interesting ways to support groups or models like the Ecological Land Cooperative⁸. It potentially could help to deliver innovative social and community models as well as, for example, share farming and perhaps apprenticeships on larger farms.
- In developing a working plan for the estate, it is important that the resulting actions and their outputs and outcomes are demonstrably sustainable (taking into account environmental, social and economic factors and aiming to keep the options of future generations open) and align with the UN Sustainable Development Goals. These Goals are as relevant for the advanced economies as they are for the developing ones. Too often sustainability is interpreted as constituting standard economic benefit and little else; aligning with the SD Goals will help avoid that trap.

⁶ See the Agricultural Transition Plan p378:” For the Landscape Recovery National Pilot, we will initiate a number of long-term projects between 2022-2024 to help us restore wilder landscapes and to form the basis of the Landscape element of the National Pilot. The focus will be on large-scale sites, typically around 2000-3000 hectares, where there are opportunities to significantly enhance the landscape to deliver a diverse range of environmental outcomes. This will support the delivery of our ambitious national targets and commitments, such as the government’s pledge to protect 30% of the UK’s land by 2030 and the establishment of a Nature Recovery Network

⁷ [Agricultural transition plan 2021 to 2024 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97422/agricultural-transition-plan-2021-to-2024.pdf) p54 gives an introduction to the scheme.

⁸ Plawhatch and Tablehurst community farms are an at-scale model in Sussex.

Omissions and concerns

- We would not support inappropriate development which would urbanise and change the character of the landscape. We do not support the proposal to reduce the size of parks and open spaces. Research by CPRE in 2020 showed that more than two thirds of those questioned in the south east (68%) believe that protecting and enhancing greenspaces should be made a higher priority after the lockdown. While just under two thirds (63%) feel that the lockdown has made them more aware of the value of green spaces to their health and wellbeing.⁹
- We are concerned by the landscape impacts of any potential solar farm and believe that a focus on PV should be within the city. We also believe that opportunities for biofuels needs to be balanced with the need to restore the chalk grassland and maintain the landscape character of the Downs and provide local food. There may be some scope for encouraging scrub/woodland copse development against the urban area, where this has become established, as long as this is not an intrusion into the classic open downland landscape and a threat to high value chalk grassland. The council must also carefully consider the carbon benefits for biofuels and examine them through full life cycle analysis to ensure that, for example, fossil fuels are not used to produce fertilisers to feed biofuel crops or land ploughed to plant them and associated GHG emissions are assessed against the claimed carbon benefits.
- The South Downs National Park has International Dark Sky Reserve status and light pollution from the City does, in places, compromise these dark skies. Light pollution is not only a very visible sign of wasted energy and associated carbon emissions, but also harms wildlife and impacts on the health and wellbeing of local people through sleep disruption. Reducing light pollution and protecting the dark skies of the Downland Estate should be a priority. We understand that there is a proposed memorandum of accord with the SDNP on dark skies, which has been positively received by the Council and we fully support this. A reduction in light pollution can also be achieved by tighter control of development into the urban fringe and by tackling currently uncontrolled light sources such as the Amex, the Asda car park and the Universities.

Yours sincerely,



Prof Dan Osborn
Chair

⁹ [Poll shows surge of love for the countryside in the south east - CPRE Sussex](#)