



The countryside charity  
Sussex

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Brighton & Hove City Council

By email: [citydownlandestateplan@brighton-hove.gov.uk](mailto:citydownlandestateplan@brighton-hove.gov.uk)

July 14, 2022

Dear Sir/Madam,

### **CITY DOWNLAND ESTATE PLAN: CONSULTATION RESPONSE FROM CPRE SUSSEX**

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 are pleased to be one of the Mayor's charities.

CPRE Sussex is keen to help shape a greener future for Sussex and the Downland Estate is an important resource that could help create that kind of future. We welcome this new draft of the City Downland Estate Plan. We are pleased that many of our suggestions we made in March 2021 have been taken onboard. The document seems now to be well-grounded in a similar natural capital and ecosystems services framework to that used by the South Downs National Park. This is a robust approach that will help deliver benefits to local communities and visitors from further afield for many years into the future. It is a framework that can be strengthened over time.

CPRE Sussex is part of the Brighton Downs Alliance (BDA) and we support the BDA's position. The Brighton Downs Alliance response incorporates much of our input on this new draft. We also are broadly supportive of comments from the Sussex Wildlife Trust.

We want to add comment relating to the ambition and delivery of the vision. We would be happy to partner with the Council and local communities to help develop these points further. The Council already know our interest in working in this way from the successful Plant Your Postcode initiative delivering tree planting for City communities through the GRCF supported Forgotten Places project.

We very much welcome the signs that thinking has moved on from the period when there were serious threats to the integrity of the Downland Estate. The support and input from many organisations has helped set out a new vision and plan. Such partnership working needs to continue to get the best from this important public resource.

*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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We believe a clear and compelling vision for the Downland Estate is crucial. Such a vision sets the level of ambition, the shape of governance, and encourages a broad set of stakeholders to engage in contributing their best towards a shared vision for this 'national treasure'. The vision starts well in Section 2 but we felt more is needed on how this vision could be delivered in Section 6. Indeed, perhaps 'delivery' warrants a dedicated section of its own ('Section 7'?) so that progress can be followed as clearly as possible by all interested parties. This would also enable examples to be given of potential delivery mechanisms and of the co-benefits that could be expected by integrated working across the activities that have been described in the plan.

Our main concern centres on the level of ambition. We would welcome an ambition that goes well beyond considering the Downland Estate as a self-sustaining asset, to an asset that is recognised as for the public good and one that delivers value far beyond what can be assessed on a purely financial basis. It should be a prized possession that everybody in Brighton & Hove recognises for the value that it provides and indeed that this value would be understood across Sussex and beyond. Our hope is for a future time when we can celebrate all that the Downland Estate has become as a 'national treasure'.

In order to engage and build the important strong partnership bonds across public, private, and civil society, we see advantages in detailed descriptions of the future that we hope for. What does this future look and feel like when we have delivered upon the vision? We believe that adding a 'Section 7' could draw upon the plan and paint a vision of the future that excites and unites all who we will need to bring with us on this challenging journey. There are several interesting developments that might make it possible to actually see what a future estate would look like. For example, the UK Centre for Ecology & Hydrology (UKCEH) have worked with other groups to produce ASSIST a system that can project into the future to show what the effect of management changes would have over time (see: <https://www.ceh.ac.uk/our-science/projects/ASSIST>). We would be able to help make links to the leaders of the ASSIST programme if that were helpful.

One issue that needs attention across Brighton & Hove as a whole but particularly in the Download area is light pollution. CPRE Sussex has accumulated a good deal of evidence on increasing background light pollution coming from new sources. One of these may be domestic and commercial security lighting but another source is lighting from sports facilities. In our area, the Brighton and Hove Albion practice of using night-time lights to help the grass grow is causing substantial light pollution and maybe one of the brightest sports light pollution sources in the whole country. This level of pollution (and associated energy use) will be affecting wildlife and people adversely and undermines the dark skies status of the National Park as a whole. CPRE Sussex's work has been enhanced recently by local citizen scientist Steve Geliot in his paper co-authored with German colleagues on this issue. The paper is published as S. Geliot, J. Coesfeld, and C. Kyba (2022) International Journal of Sustainable Lighting, 39-51. <https://www.lightingjournal.org/index.php/path/article/view/125/119>

CPRE Sussex is keen to explore with the Council what actions might be taken to improve the light pollution that will be impacting the Downland Estate. We would be happy to share our own evidence and believe Steve Geliot would feel likewise.

Multiple resources inside and outside of the Council will need to be called on to deliver upon the plan. CPRE Sussex is committed to shaping a greener future for Sussex. We are ready to partner with you to deliver the Downland Estate Plan and to see it become an inspiration for all of Sussex. On the topic of partnership, our recommendation is that Brighton & Hove Council considers organisations such as ours as delivery partners rather than supporters. The diagram and description in the section 'Management and delivery' should reflect a closer alliance of interconnected and interlocking relationships. No one organisation can deliver alone the vision for this national treasure, it is only by working together that we can achieve this for the benefit and wellbeing of all.

Yours sincerely,

Dan Osborn, Chair, CPRE Sussex, the Sussex countryside charity