



COTSWOLDS NATIONAL LANDSCAPE BOARD POSITION STATEMENT

CRITERIA FOR THE PLANTING OF MISCANTHUS AND SHORT ROTATION COPPICE

Background

The Cotswolds National Landscape Board supports the planting of energy crops within the National Landscape or contiguous areas for local renewable energy generation provided this is done in ways that are consistent with conserving and enhancing the landscape and natural beauty of the area and does not detract from the understanding and appreciation of the Cotswolds by residents and visitors.

A wide range of crops can be grown for energy, including oil seeds, cereals, willow and miscanthus. Miscanthus and short rotation coppice have the potential to make an important contribution to renewable energy production. Oil seeds and cereals are annual crops and normally grown in rotation. This position statement concerns miscanthus and short rotation coppice which are tall, non-rotational crops, grown and harvested from the same field for up to 30 years¹.

The Board is concerned about the lack of management of existing woodland and believes that priority should be given to the management and utilisation of existing woodland over the planting of energy crops, particularly short rotation coppice.

The Board also recognizes the importance of farming and forestry to the economy of the Cotswolds and supports rural land management which conserves and enhances natural resources including biodiversity, landscape character and the historic environment, and aids public enjoyment of the Cotswolds. It therefore wishes to work with farmers, renewable energy promoters and Defra to encourage good practice in the growing of miscanthus and short rotation coppice – see below – so that this can be consistent with the protection of the landscape and biodiversity and of the enjoyment of the landscape by residents and visitors to the Cotswolds.

These policies are contained in the Cotswolds AONB Management Plan 2023 - 2025 and are in line with Government and local policy. All these statements make it clear that the purpose of designating an AONB takes priority over other considerations. So while the Board acknowledges that the Cotswolds National Landscape has the potential to contribute to renewable energy generation targets, it is concerned that the pursuit of

¹ This position statement does not cover traditional coppice or short rotation forestry which is the practice of cultivating fast-growing trees that reach their economically optimum size between eight and 20 years after planting and are harvested when stems typically reach 15cm diameter.

such targets without regard to the needs of this nationally important landscape could be very damaging.

The impact of miscanthus and short rotation coppice

Miscanthus can grow up to 3.5m in height and short rotation coppice to 7-8m prior to harvesting and consequently can be visually intrusive in the landscape and can affect the public's enjoyment of the Cotswold countryside. There are also concerns that miscanthus rhizomes can spread into field boundaries and possibly adjacent habitats, roadside verges. Evidence suggests that rhizome spread is, however, slow and is considered a low risk. There are further concerns over impact on soils as the crops are harvested in the winter, and over their impact on farmland biodiversity.

Removal of miscanthus and short rotation coppice at the end of their productive lives can be problematic, especially short rotation coppice poplar which requires excavating.

Natural England, English Heritage and the Forestry Commission have published information and guidelines on establishing and managing miscanthus and short rotation coppice. These guidelines are generic in nature. Whilst useful guidance for landowners and farmers should be referred to when considering planting miscanthus and short rotation coppice it does not take account of some of the particular characteristics of the Cotswolds AONB. For that reason the Board has developed some guidance specific to this area.

Recommended good practice in the Cotswolds National Landscape

The Board expects a cautious approach to be taken to the planting of miscanthus and short rotation coppice within or adjacent to the Cotswolds National Landscape. It recommends the following good practice.

The planting of miscanthus or short rotation coppice is not appropriate:

- **Where planting would intrude into or restrict views, particularly open views across the landscape**
- **In fields with cross-field public rights of way**
- **On skyline sites**
- **On semi-natural habitats including unimproved limestone grassland, ancient woodland sites and wetlands**
- **On permanent pasture²**

² **"Permanent pasture"** mean land used to grow grasses or other herbaceous forage that has **not been included in crop rotation of the holding for five years or longer.**

- On sites with priority species that could be affected in a negative way: this includes rare arable plants such as Shepherds Needle and farmland birds such as Corn Bunting. A list of species is annexed
- Where archaeological sites could be damaged, or significant historic landscape (such as designed parkland) would be adversely affected
- On or obscuring locations of geological or geomorphological importance: this includes dry valley systems, valley bulges and other features for which the Cotswolds are important
- On sites with poor road access

In accordance with GAEC It is important that farmers and landowners consider the impact on soils of growing and harvesting miscanthus and short rotation coppice. While the harvesting of miscanthus and short rotation coppice can cause soil erosion and contamination of water courses (especially in places where the soils are light), once established, such crops have a network of surface roots which may help inhibit soils from reaching rivers. The crop also needs to be managed to prevent any risk of the rhizomes creeping into hedges, dry stone walls and key habitats such as unimproved grassland and woodland, especially ancient woodland.

Up to 10% of the area to be planted should be left as open ground, and wide field margins/headlands should be retained. In addition, those field margins with public rights of way over them should be left unplanted and maintained by the landowner to at least twice the minimum width specified in the Highways Act 1980 (as amended by the Rights of Way Act 1990) for miscanthus and three times the minimum width for short rotation coppice, i.e. 3m and 6m respectively for public footpaths and bridleways.

End

ANNEX

Priority species (on the English List and UK BAP) that may be adversely affected by the planting of miscanthus:

Farmland Birds

Corn Bunting
Grey Partridge
Linnet
Lapwing (nesting sites)
Tree Sparrow
Skylark (nesting sites)
Yellow Wagtail

Rare Arable Plants

Shepherds Needle
Broad-fruited Cornsalad
Cotswold Pennycress
Cornflower
Red-hemp Nettle

Mammals

Brown Hare
Harvest Mouse
Bats

The Cotswolds National Landscape Board has the statutory duty to pursue the following two purposes:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the AONB.

Purpose of the Board's Position Statements

The primary purpose of the Cotswolds National Landscape (CNL) Board's position statements is to expand on relevant policies in the Cotswolds National Landscape Management Plan. They provide further context, guidance and recommendations in relation to specific policies and associated issues. They are not intended to create new policies.

The Board's position statements are also intended to help local authorities, developers and other relevant stakeholders:

- to have regard to – and positively contribute to - the purpose of conserving and enhancing the natural beauty of the CNL;
- to ensure that the purpose of AONB designation is not compromised by development and that the natural beauty of the CNL is conserved and enhanced;
- to fulfil the requirements of the National Planning Policy Framework and Planning Practice Guidance (or, where relevant, National Policy Statements) with regards to AONBs and the factors that contribute to their natural beauty;
- to take account of relevant case law;
- to have regard to and be consistent with the CNL Management Plan and guidance published by the Board;
- to emulate best practice in the CNL and other protected landscapes;
- to develop a consistent and coordinated approach to relevant issues across the whole of the Cotswolds National Landscape and its setting.

website: www.cotswoldsaonb.org.uk.