Interim
Management
Plan Review
(2023/25) Strategic
Environmental
Assessment
Environmental
Report

The Cotswolds National Landscape

Paul Tiplady 20th March 2023





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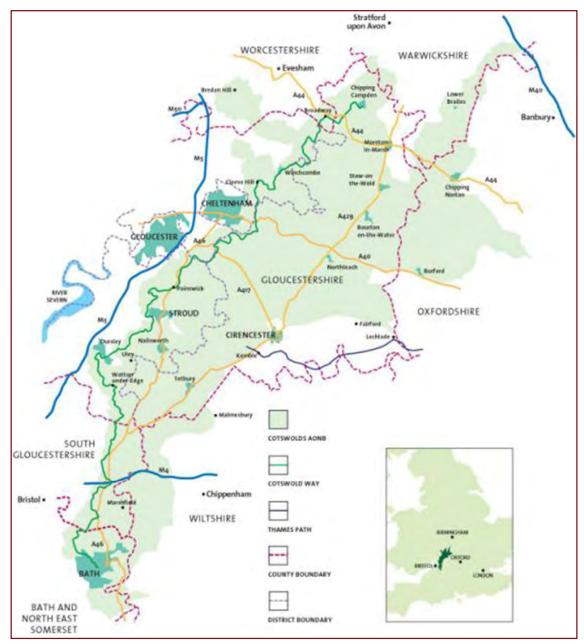
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Acknowledgements

Craggatak Consulting prepared this report with the support of staff from the Cotswolds National Landscape.

Figure 1: The Cotswolds National Landscape



Source: Cotswolds National Landscape Board

Strategic Environmental Assessment Non-Technical Summary

Introduction

Designation of the Cotswolds National Landscape as an Area of Outstanding Natural Beauty (AONB) was in 1966, with an extension in area in 1990. Although AONB is still the legal name of the designation, it was rebranded as a 'National Landscape' for most purposes in June 2020. At 2038 square kilometres, it is one of the largest protected landscapes in England. The National Landscape stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north. It cuts across 15 local authority areas.

The Cotswolds National Landscape Board has a legal duty to prepare and publish a Management Plan for the AONB¹. The plan sets out a framework that gives guidance and direction towards achieving the long-term vision for the AONB. The proposed Management Plan is an interim document; there will be a full review in two years' time. The plan has a cascade of three aims and 14 outcomes addressed through 24 policies.

Purpose of this Environmental Report and other Assessments

This Environmental Report describes the likely environmental effects of implementing the AONB Management Plan. Strategic Environmental Assessment (SEA) helps to identify, describe and evaluate any significant environmental effects arising from implementing the Management Plan, or any reasonable alternatives. It highlights any significant beneficial effects and records any remaining negative effects considering any measures that will make them less harmful.

There are two other assessments of this Plan. One is a Habitats Regulations Assessment (HRA) that considers the effects on 'European sites' designated for their nature conservation importance. The other is an Equality Impact Assessment (EqIA) that considers the diverse needs and requirements of the communities in the area. The findings are in separate reports, but the HRA screening finds that no policies or objectives in the AONB Management Plan are likely to have any likely significant effect on any important biological or geological site. The EqIA concludes that the plan would have no negative impacts on those groups of people identified in law as being at risk of discrimination.

Scope of the Assessment

There was a Scoping process during December 2022 and January 2023 to help ensure the assessment covered the key environmental and sustainability issues relevant to the AONB and its setting. The main bodies with environmental responsibilities were engaged in the Scoping process These were Natural England, Historic England and the Environment Agency, and their responses helped to shape the assessment framework.

A review of other plans and programmes helped develop a wider understanding of the issues and priorities relevant to the Site and its setting as well as the wider area. There is wide recognition of the importance of the natural, cultural and built environment of the Cotswolds. The National Landscape Interim Management plan seeks to address three key issues driving change within the Cotswolds:

- Climate change is happening, and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and special qualities of the Cotswolds National Landscape.
- 2. Climate change is threatening the loss of already diminished wildlife at an even greater scale and pace. There is a need to create a network of well managed wildlife-rich places to help wildlife populations grow and move in response to habitat changes. The need for action is urgent to avoid an event where species vanish much faster than they can reproduce.

¹ Section 89 of the Countryside and Rights of Way Act 2000

3. The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The recent coronavirus pandemic has had a significant impact on human behaviour. For example, people have travelled less and many have worked from home. People are more aware of the importance of accessible land and water.

Environmental baseline information

Baseline environmental information establishes the context of the Management Plan and predicts how the conditions would progress in the absence of that plan. The assessment uses nine Environmental Objectives to represent the local environmental issues. They test whether the Management Plan policies (or their absence) create adverse effects on the special qualities of the AONB.

Summary of the appraisal

The proposed policies are well-matched. There are no tensions or sensitivities arising from where two or more policies interact. The proposed policy cascade has a beneficial, and in parts a significantly beneficial, effect on the SEA Environmental Objectives. There are no adverse effects on the SEA Environmental Objectives so there is no need to consider measures to increase the beneficial effects but opportunities exist to do so. There is no recommendation for mitigating actions.

The findings are that the proposed policies consistently give greater environmental benefits than the 'do-nothing' situation. In most cases, the benefits are only marginally better than the 'do-nothing' scenario. The plan deals with the key issues of climate change and nature recovery. Most of the actions mirror those of other players with the exception, perhaps, of natural and cultural accounting. But the policies address the key issue of health and societal change quite proactively. The plan sets out an engagement agenda with people who do not currently seek out the benefits of the landscape, whether they be residents or live in the surrounding areas. Other bodies do pursue such initiatives but the Management Plan is very clear about the needs and the means of satisfying them. It is not certain that other players would pick these up. The Plan adds value by delivering those elements that will not happen without coordinated action across the Cotswolds. The focus on the climate emergency, the ecological crisis and health and societal changes addresses the priorities set by Defra and responds to the challenges set out in the Environment Act 2021.

Monitoring

The SEA Regulations require monitoring measures for all the significant effects, both positive and negative, identified in the assessment. The SEA of the draft management plan has identified no significant negative effects that are likely to arise from the implementation of management plan. Some significant positive effects are likely to arise from the implementation of the plan. The overall assessment of the current baseline data is that it is good. There are opportunities to strengthen it further but the interim nature of the plan limits this. The current indicators deliver an effective monitoring framework.

Consultation

The SEA Scoping Report went out for consultation during December 2022 to which the Environment Agency, English Heritage and Natural England responded.

The Environment Agency agreed that the SEA Scoping Report is sufficiently robust but recommended the updating and inclusion of three plans for reference. Historic England confirmed that, given the 'light touch' review of the interim Management Plan, the proposed methodology provides an appropriate consideration of the historic environment. Natural England suggested additional wording to describe one of the environmental objectives and asked for the monitoring indicators to better reflect the effects of the plan itself rather than wider changes. All these points were accepted.

The SEA Environmental Report went out for consultation in February 2023 to which English Heritage and Natural England responded. They both supported the conclusions of the assessment and had no further comments to make.

Conclusion

There is nothing in the management plan that will undermine the special qualities of the AONB. Implementation of the proposed Interim Management Plan will have environmental and sustainability benefits for the Cotswolds National Landscape.

A full version of this version of the SEA Environmental Report is available from the Cotswolds National Landscape Conservation Board.

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1. Background

- 1.1. This Scoping Report has been prepared as part of the Strategic Environmental Assessment (SEA) of the Cotswolds Interim Management Plan Review. The statutory consultation bodies (Natural England, Historic England and the Environment Agency) must agree the scope and level of detail to be contained in the Environmental Report. The SEA Scoping Report went out for consultation during December 2022.
- 1.2. All three statutory consultation bodies commented. Historic England confirmed that, given the 'light touch' review of the interim Management Plan, the proposed methodology provides an appropriate consideration of the historic environment. The Environment Agency agreed that the SEA Scoping Report is sufficiently robust but recommended the updating and inclusion of three plans for reference. Natural England noted the key local environmental and sustainability issues identified and did not have any specific comments to make. Referring to the Sustainability Appraisal Framework, it suggested an addition to the narrative attached to E2- Soils, Air and Water. However, the agency's main concern was with the Headline Indicators. It stated that the monitoring indicators should relate to the effects of the plan itself, not wider changes. Their advice was to develop bespoke indicators to reflect the outcomes of National Landscape management decisions.
- 1.3. All the points submitted were accepted. Additional plans and policies were added to reference the most up-to-date river basin management plans and add the National Flood and Coastal Erosion Risk Management Strategy for England and regional Flood Risk Management Plans. We have also added references to Green Infrastructure Strategies, Nature Recovery Plans, and the adjacent Community Forest plans to consider the setting and context of the National Landscape. As to the concerns about the indicators, the Board agrees. The Headline Indicators for this report have been modified in line with the advice but it will take time to develop effective base-line data. Given the interim status of the current review, the Board will make this a priority for the next Sate of the Cotswolds report, which will inform the full management plan review in 2025.

Strategic Environmental Assessment

- 1.4. Strategic Environmental Assessment is a statutory requirement² to ensure that land-use plans and programmes that are likely to have significant effects on the environment are the subject of a strategic assessment of options and alternative courses of action during plan preparation to avoid or mitigate any adverse effects. The approach for carrying out the SEA of the Management Plan Review is based on current best practice and the following guidance:
 - HMSO (September 2005) A Practical Guide to the SEA Directive, Office of the Deputy Prime Minister, Scottish Executive, Welsh Assembly Government, Department of the Environment for Northern Ireland.
 - Dodd et al (2007) The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it, RSPB.
 - Natural Scotland (September 2006) Strategic Environmental Assessment Toolkit. Scottish Executive.

² Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment". Transposed into law by Statutory Instrument 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations"), http://www.opsi.gov.uk/Sl/si2004/sch1

- Countryside Council for Wales (2008) The Areas of Outstanding Natural Beauty in Wales Guidance on the Review of Management Plans
- Richard Partington et al (January 2008) Guidance to English AONB Partnerships and Boards on Strategic Environmental Assessment (SEA) of AONB Management Plans, Natural England
- Historic England (2016): Sustainability Appraisal and Strategic Environmental Assessment Advice Note 8
- 1.5. To integrate fully the SEA process with the production of the Management Plan there is close collaboration with the review team. There are five stages to a Strategic Environmental Assessment:

Stage A: Scoping and consultation with Environmental Bodies

Stage B: Assessment of plan content and analysis of alternatives

Stage C: Preparation of an Environmental Report

Stage D: Consultation and consideration of the SEA findings by the decision maker;

and

Stage E: Monitoring the performance of the plan against the SEA findings.

1.6. This report supports Stages B and C. The SEA Scoping Report consultation responses have been considered and used to inform relevant sections of the SEA Environmental Report (this document).

Purpose of the Environment Report

- 1.7. This Environmental Report sets out the findings of the Strategic Environmental Assessment for the AONB Management Plan review. Its primary purpose is to identify, describe and evaluate any significant environmental effects arising from implementing the management plan, or any reasonable alternatives. Any significant beneficial effects are highlighted, as well as recording any residual negative effects once mitigating measures are taken into account.
- **1.8.** This assessment follows the requirements of the European Directive 2001/42/EC³ and the Environmental Assessment of Plans and Programmes Regulations 2004⁴. The methodology used follows the guidance set out in paragraph **1.4**.

Cotswolds National Landscape

1.9. The Cotswolds National Landscape was designated as an Area of Outstanding Natural Beauty (AONB) in 1966, and extended in area in 1990. Although AONB is still the legal name of the designation, it was rebranded as a 'National Landscape' for most purposes in June 2020. At 2038 square kilometres, it is the largest AONB – and the third largest protected landscape, including National Parks – in England. The National Landscape stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north (Figure 1). It cuts across 15 local authority areas.

³ European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment", known as the Strategic Environmental Assessment or SEA Directive.

⁴ SEA Directive, 2001/42 transposed into English law through the 'Environmental Assessment of Plans and Programmes Regulations 2004' (Statutory Instrument No 1633)

1.10. AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them⁵. Each AONB has been designated by reason of its 'special qualities'. These include the flora, fauna, historical and cultural associations as well as landscape and scenic views.

Management Plan review

- 1.11. Section 82 of the Countryside and Rights of Way (CRoW) Act 2000 establishes the primary purpose of AONB designation as the conservation and enhancement of natural beauty. Section 85 of the CRoW Act places a duty on all public bodies to 'have regard' to the 'purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. Under Section 89, the relevant local authorities must prepare and publish a Management Plan for each AONB; and keep it under review. The Management Plan is a statutory document. It provides a policy framework that brings together partners to help them design, resource and implement the priorities set out specifically for the AONB designation. It guides and informs all other plans and activities that may affect the AONB so that they can contribute to the continued conservation and enhancement of the AONB designation.
- 1.12. For this AONB, there is one relevant authority, the Cotswolds National Landscape Board. Established as the Cotswolds Conservation Board by Parliament in 2004, it has two statutory purposes⁶:
 - To conserve and enhance the natural beauty of the Cotswolds National Landscape.
 - To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the National Landscape. In circumstances where these purposes and duties are irreconcilable, the Board must give priority to conserving and enhancing the natural beauty of the National Landscape⁷.

- 1.13. The Board consists of 37 members, of whom local authorities nominate 15, the parish councils nominate eight, and government appoint 14. The Board's work programme is delivered by a small team of staff, supported by volunteers including the Cotswold Voluntary Wardens who deliver a programme of practical projects and guided walks across the National Landscape
- 1.14. The current Management Plan is for the 2018-23 period. CRoW requires a formal review of each Management Plan at intervals of not more than five years. Due to possible pressures and changes soon, the Board has decided that an interim review is appropriate. The Board is now preparing an interim Management Plan for the period 2023-25. Following consultation with local communities, public bodies and agencies with an interest in the area, the interim plan will present the special qualities and features of the National Landscape, and set out the outcomes and policies needed to ensure their conservation and enhancement.
- 1.15. The Outcomes and policies are set out under three over-arching headings that reflect the National Landscape's purpose of designation (to conserve and enhance natural beauty) and

⁵ Department for Environment, Food and Rural Affairs (Defra) (2015) *Areas of Outstanding Natural Beauty:* Landscape Protection and Enhancement Support Scheme (England) 2015 – 17. Application to European Commission.

⁶ Section 87, Countryside and Rights of Way Act 2000, as amended by the NERC Act 2006.

⁷ This prioritisation of conserving and enhancing is known as the 'Sandford Principle', after Lord Sandford, who chaired the National Parks Policy Review Committee between 1971 and 1974.

the National Landscape Board's additional purpose (to increase understanding and enjoyment). The headings are:

- 1) **Cross Cutting Themes** Tackling 21st century issues through progressive partnerships, addressed by 8 policies.
- 2) **Conserving and Enhancing** Influencing and delivering for landscape, nature and climate, addressed by 13 policies.
- 3) **Increasing Understanding and Enjoyment** Ensuring access, learning and wellbeing opportunities are for everyone, addressed by 3 policies.

The policy framework is set out in **Appendix 1**.

Relationships with other assessments

Habitat Regulation Assessment

- 1.16. The EU Natura 2000 network (now known as the 'national sites network') provides ecological infrastructure for the protection of sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. Habitat Regulations Assessment is a statutory requirement⁸ to ensure that the protection of the integrity of these sites is a part of the planning process at a regional and local level. Under the Regulations, there is a requirement for the Cotswolds National Landscape Board to undertake a HRA of the interim Management Plan to determine whether its policies and actions are likely to have a significant adverse effect on any internationally recognised sites of nature conservation interest. These sites include Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Offshore Marine Sites. It is common practice to treat RAMSAR sites (Internationally Important Wetlands) as if they were national sites. The guidance recommends taking into consideration national sites within the plan area and within 15km of its boundary. The relevant sites are:
 - Avon Gorge Woodlands SAC
 - Bath and Bradford on Avon Bats SAC
 - Bredon Hill SAC
 - Chew Valley Lake SPA
 - Cothill Fen SAC
 - Cotswold Beechwoods SAC
 - Dixton Wood SAC
 - Lyppard Grange Ponds SAC
 - Mells Valley SAC
 - Mendip Woodlands SAC
 - North Meadow and Clattinger Farm SAC
 - Oxford Meadows SAC
 - River Avon SAC
 - Rodborough Common SAC
 - Seven Estuary RAMSAR
 - Seven Estuary SPA

⁸ Council Directive 92/43/EEC of 21st May 1992 on the conservation of natural habitats and of wild fauna and flora. Transposed into law by the Conservation (Natural Habitats) Regulations 1994 (Habitats Regulation) as amended in 1997 and in 2000 (in England only) as amended in 2017 (SI 1012); and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (SI 1013). The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (SI 579) amends both regulations.

- Walmore Common RAMSAR
- Walmore Common SPA
- 1.17. The environmental assessment findings are, in part, based on findings from a Habitats Regulations Assessment (HRA) Screening of the Management Plan Consultation Draft. The HRA reports separately but its findings are relevant for the SEA Objective E3 (Protect and enhance biodiversity habitats and species).
- 1.18. The screening of the Management Plan found that no policy areas would have a 'Likely Significant Effect' on the UK national site network of European conservation sites.

Equality Impact Assessment

- 1.19. The Equality Act 2010 aims to ensure that everyone has a fair chance in life. It contains a requirement for Local Authorities to consider the diverse needs and requirements of the communities in their areas when planning the services they offer. The Management Plan is not subject to the Equality Act but it does have the potential to affect people living, working, visiting or carrying out business in the area. The Board wishes to ensure that the Vision and Policies do not discriminate in the provision of service and amenity, and that, where possible, they advance equality of opportunity between people. Therefore, there is a high-level Equality Impact Assessment (EIA) that considers impacts on nine groups set out in the Equality Act 2010:
 - Age
 - Disability
 - Gender reassignment
 - Marriage and Civil Partnership
 - Pregnancy and Maternity
 - Race / Ethnicity
 - Religion or belief (including lack of religion or belief)
 - Sex
 - Sexual Orientation
- 1.20. The environmental assessment findings are, in part, based on findings from an EIA of the Management Plan Consultation Draft. The EIA reports separately but its findings are relevant for SEA Objective E7 (Safeguard and enhance human health).
- 1.21. The screening of the Management Plan found that there is no evidence to indicate that the Management Plan would cause a significant differential impact on people defined under the nine equality characteristics. There may be positive impacts for both young and older people, people with disabilities and under-served groups. There is some uncertainty about the impacts arising from climate change policies but the definition of specific proposals is yet to happen.

Natural capital and an ecosystem approach

1.22. Natural capital is another term for the stock of renewable and non-renewable natural resources on earth (e.g., plants, animals, air, water, soils, minerals) that combine to yield a flow of benefits or "services" to people⁹. These flows can be ecosystem services or abiotic services, many of which we depend on. Ecosystem services are the benefits to society from nature; abiotic services are benefits to people that do not depend on living processes. They arise from fundamental geological processes.

⁹ Adapted from the Natural Capital Protocol, 2016

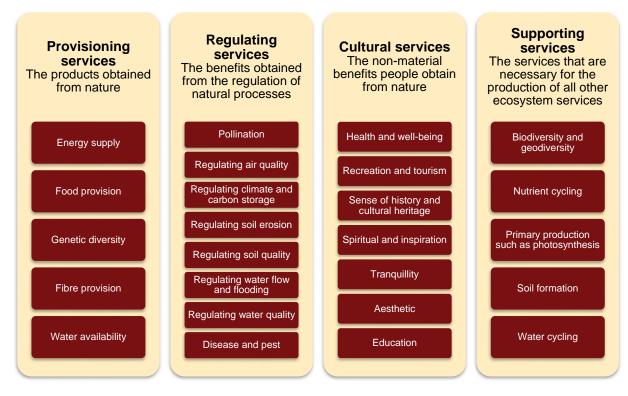
1.23. An ecosystem approach makes explicit the link between the status of natural resource systems and ecosystem services that support human well-being. It seeks to maintain the integrity and functioning of ecosystems to avoid rapid undesirable ecological change. It also recognises that the impacts of human activities are a matter of social choice, and are as integral to ecosystem interactions as ecosystems are to human activities.

Definition of an Ecosystem Approach

"a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way"

Convention on Biological Diversity definition¹⁰

- 1.24. This approach provides a way to manage nature that combines three core themes¹¹
 - the ecology of the natural environment, including its functions and processes;
 - the benefits that people get from the natural environment (ecosystem services); and
 - the value of nature to society (in both monetary and non-monetary terms).
- 1.25. The availability of expertise and data limits the application of the ecosystem approach to the management of protected areas. Ecosystem services provided in the Cotswolds are likely to include:



1.26. The data is not readily available to enable a full valuation of these services. However, even an initial assessment of ecosystem services affected by a policy choice can indicate how potentially significant impacts could be and where uncertainties and evidence gaps lie. Key

¹⁰ Secretariat of the Convention on Biological Diversity (2004) The Ecosystem Approach, (CBD Guidelines) Montreal: Secretariat of the Convention on Biological Diversity 50 p.

¹¹ Hunt, D. Crosher, I., Wharton, A. & Hayes, G. (2012). *Embedding the Ecosystem Approach into existing landscape scale or area based partnership delivery: Internal guidance for Natural England staff.* Natural England, November 2012

- indicators help monitor the condition of the ecosystem services. There is consideration of the effects of proposed or alternative actions on their status.
- 1.27. This SEA supports an ecosystem approach. It will consider the possible indirect, direct and cumulative effects of projects implemented under this plan. It is not an ecosystem service valuation.

Relationship to other policies, plans and programmes

- **1.28.** A key element in the SEA process is to review relevant international, national, regional and local policy guidance, plans and strategies, to:
 - Ensure the Management Plan proposals and the SEA are consistent with and comply
 with the requirements of relevant plans and policies, especially where they refer to
 environmental priorities;
 - Identify environmental objectives, key targets and indicators that should be reflected in the SEA;
 - Provide evidence for the SEA rationale.
- **1.29.** The selection criteria were:
 - International documents having the status of a plan, policy or programme
 - National documents having the status of a national strategy or a White Paper outlining intended policy
 - Regional and local documents having the status of strategy or policy
 - Other documents not having a statutory status but policy documents published by the statutory bodies

Appendix 2 list the documents under review. This review informs the SEA.

Legislation, Conventions and national advice

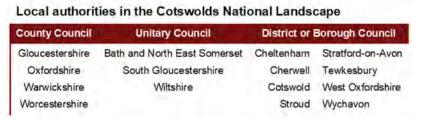
- 1.30. Area of Outstanding Natural Beauty is a statutory landscape designation. The National Parks and Access to the Countryside Act 1949, as modified by the Countryside and Rights of Way Act 2000, provides the primary legislation for the designation of Areas of Outstanding Natural Beauty. From the Acts, a particular set of objectives is developed for AONBs¹²:
 - The primary purpose of designation is to conserve and enhance natural beauty.
 - In pursuing the primary purpose of designation, account should be taken of the needs of
 agriculture, forestry, other rural industries and of the economic and social needs of local
 communities. Particular regard should be paid to promoting sustainable forms of social
 and economic development that in themselves conserve and enhance the environment.
 - Recreation is not an objective of designation, but the demand for recreation should be
 met so far as this is consistent with the conservation of natural beauty and the needs of
 agriculture, forestry and other uses.
- 1.31. Ratification of the European Landscape Convention by the UK was in November 2006; and became binding on the 1 March 2007. The Convention aims to ensure the proper protection, management and planning of landscapes across Europe and aims to bring all countries up to the standard of the best.

¹² Countryside Agency (2006), Guidance for the review of AONB Management Plans, CA221, Cheltenham, August 2006

- 1.32. Following the passing of the European Union (Notification of Withdrawal) Act 2017, the UK left the European Union on the 31st January 2020 (there followed a 12-month transition period. The new Management Plan takes account of the changed relationship between the UK and the EU. The natural environment of the Cotswolds has benefited from some support from EU budgets, particularly for research and academic cooperation. That support is very likely to stop unless the UK government gives a clear undertaking to match any existing funding. There could be a period of inertia whilst building new resources and structures.
- 1.33. In 2018, Defra launched its 25-year plan for the environment¹³ that includes an action to work with AONB Partnerships and Conservation Boards to deliver environmental enhancement, including through demonstrator projects, and engaging with communities through their statutory management plans. Defra also expressed a strong desire to develop a natural capital approach to ensure that policies align with environmental outcomes and yield the best return on every pound spent. They believe that investments in natural capital assets can deliver significant value for money and generate economic returns that rank favourably with those generated by more traditional infrastructure investments. There was also a call to deliver local nature recovery strategies. Defra expect the AONB Management Plan to secure the right mix of public and private funding and financing for projects that protect and enhance natural assets.
- 1.34. The National Planning Policy Framework (2019) sets out the Government's planning policies for England and how to apply them. Paragraph 172 says that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. It goes on to state that the conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.

Local Authorities

1.35. The AONB lies with the bounds of 15 local authorities. These are of three types, Unitary Authorities, County Councils and District (or Borough) Councils. The



County Councils have many responsibilities but two have a direct effect on the Cotswolds. As the minerals and waste authorities, they produce minerals and waste local plans. They also deal with local transport, highways and tourism. The District Councils are required to produce development plans to guide spatial change and growth within their areas. These plans set out the vision and framework for future development in their area. They address needs and opportunities in relation to the economy, housing, community facilities and infrastructure; as well as provide a basis for safeguarding the environment (including the National Landscape), adapting to climate change and securing good design. The Unitary Councils have both the County and the District responsibilities.

Government Agencies

1.36. There is a range of Government Agencies whose actions impact upon the Cotswolds. Their strategies set high-level policy and generally cover the whole of the country. Any mention of a

¹³ Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment, HMSO

- particular site, such as the Cotswolds, within these policies indicates the high national importance of the topic.
- 1.37. Natural England's purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development. It seeks a well-managed Nature Recovery Network across England which connects people to the natural environment for their own and society's wellbeing, enjoyment and prosperity. It is directly responsible for the management of the national sites and prepares plans to ensure that these sites reach a favourable ecological condition.
- 1.38. Historic England protects historic places such as Scheduled Monuments, archaeological sites, registered parks and gardens, scheduled landscapes, and listed buildings; and protected wrecks. The Agency prepares plans and advice to ensure decisions serve people, places and the economy
- 1.39. It is the Environment Agency's duty to protect and improve the environment. In England it regulates major industry and waste, and the treatment of contaminated land. It is responsible for water quality, resources and fisheries; inland river, estuary and harbour navigations; and conservation and ecology. It is also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.

2. Environmental and sustainability baseline information

Key local environmental trends

- 2.1. The SEA Directive requires the collation of detailed baseline information as part of the assessment process. Information must be gathered on "relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan" and the "environmental characteristics of the areas likely to be significantly affected" (Annex I (b) & (c)).
- 2.2. There is a requirement for the baseline data to highlight "any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive)" (Annex I (c)).
- 2.3. The assessment of impacts of a plan must be based on the current state of the environment, the 'baseline'. The source of baseline information will be in line with the Schedule 2 of the SEA Regulations. We use MEOPL (monitoring environmental outcomes in protected landscapes) Reports, State of the AONB Report, Natural England's National Character Area Profiles (mainly 107 but including 95, 96, 106 117 and 118) and the evidence-base attached to the preparation of the local authority Local Development Plans. The baseline is, therefore, informed by factual data and professional judgement based on survey. The data is set out in Appendix 6.
- 2.4. The Board identifies three key issues driving change within the Cotswolds National Landscape:
 - The Climate Emergency Climate change is happening, and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and Special Qualities of the Cotswolds National Landscape.
 - Nature's decline and the Ecological Crisis Wildlife loss is well documented and understood. Climate change is threatening the loss of already diminished wildlife at an

- even greater scale and pace. There is a need to create a robust and resilient nature recovery network a landscape rich in joined up and well managed habitats. The need for action is urgent to avoid a mass extinction event.
- Health and societal changes The mental and physical health benefits of accessing
 natural beauty are becoming increasingly understood and appreciated. The COVID-19
 pandemic has had a significant impact on human behaviour. For example, people have
 travelled less and many have worked from home. People are more aware of the
 importance of green and blue spaces.

The key issues associated with the environmental trends within the AONB and the likely outcomes if no action is taken are shown in **Appendix 3**.

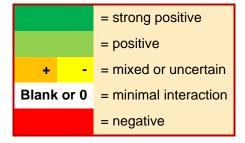
Environmental appraisal framework

- 2.5. The Natural England Guidance sets out a generic list of SEA Objectives. For the SEA Assessment, we use 9 SEA Environmental Objectives. These ensure that the Objectives and accompanying issues and criteria are appropriate for this SEA. Appendix 4 presents the SEA Environmental Objectives, complete with key sustainability issues arising from the scoping exercise. The key issues will help ensure that the SEA is as locally specific as possible
- 2.6. We also set out indicators that link the SEA Objectives to data and provide the basis for monitoring. In the consultation Scoping Report, we identified 36 Key Indicators thought to be useful when undertaking the SEA assessment. After consultation, this was reduced to 24 deliverable Headline Indicators that can monitor the application of the management plan's policies. Monitoring also occurs through other programmes and we show additional indicators for which data may be available.

3. Environmental assessment

Methodology

- 3.1. Step 1 is to consider the Management Plan draft text and test the compatibility of its policies and objectives. The intent is to identify potential tensions or sensitivities where two or more interventions interact. We collect the findings in a Compatibility Matrix and summarise them in a chart.
- 3.2. Using professional judgement, we plot each relationship as:



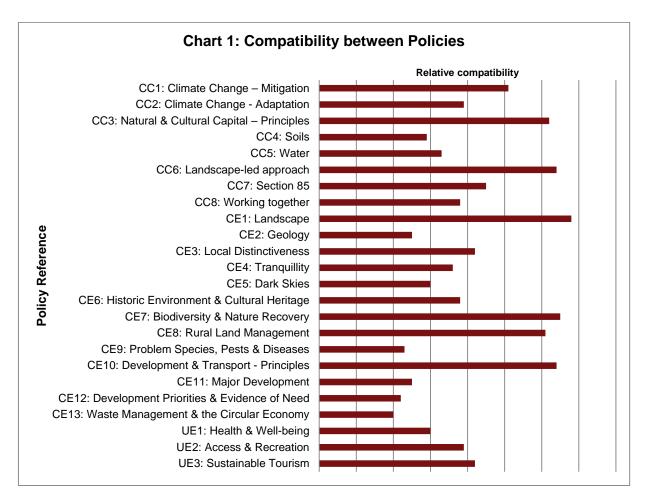
A commentary develops the findings to take account of the varying environmental sensitivities of the different topic areas. The consideration of the compatibility of the vision for the AONB

and the defined attributes of the site is a part of this stage. We will express this as a **Policy Cascade** supported by the commentary.

- **3.3.** Step 2 is to check each objective against the full range of SEA Objectives, as identified in the SEA Scoping Report. The intent is to measure the significance of the effect in terms of:
 - Beneficial or adverse effects;
 - Magnitude of the effects;
 - Direct and indirect effects;
 - · Cumulative effects; and
 - Reversible or irreversible effects.
- 3.4. The findings will emerge in a **Consistency Matrix** for each objective area and summary tables and charts present the combined effects of the objectives and their policies. A plot of each relationship will use the same discipline as for the Compatibility Matrix.
- 3.5. Step 3 is to consider **Alternative Solutions** to the issues identified during the Management Planning process. As there is no alternative solution published, we will make a 'do-nothing' comparison. The purpose is to show that the chosen pathway is the most-sound in terms of the environment and wider sustainability. This analysis tests the proposed actions and the 'do-nothing' scenario against the trends identified in the SEA Scoping Report (as shown in Appendix 3).
- 3.6. Finally, we draw and present our Conclusions.

Compatibility between Management Plan policies

- 3.7. The first task was to check each policy of the Management Plan against each other in Compatibility Matrix to see whether there were any potential tensions or sensitivities arising where two or more interact. The full policy cascade is set out in Appendix 1.
- 3.8. The findings are set out in **Table 1**. The policies run both horizontally and vertically, so each interaction appears twice (appearing either side of the diagonal grey band). The grey squares are where each separate policy meet and is not a part of the assessment. Squares close to the grey band represent policies that lie together in the plan. There are no negative impacts or uncertainties between the policies but there are many minimal interactions (white squares). This is not surprising as the policies are generally quite specific in their intent. There is very little duplication of actions.
- 3.9. It is important to consider the strong positive relationships. These are what will focus the plan. The blocks of green in Table 1 running along the grey axis reflects the policy groupings. The green blocks away from this axis suggest that there are some strong links between certain policies. This is clearer in **Chart 1**; a chart showing the indicative strengths of each policy.
- 3.10. The policies with the strongest positive relationships with other policies are CE1 (Landscape), CE7 (Biodiversity & Nature Recovery), CE10 (Development & Transport principles), CC6 (Landscape-led approach), CC3 (Natural & Cultural Capital principles), and CE8 (Rural Land Management). These are followed closely by CC1 (Climate change mitigation). This reflects the priority given in the Management Plan to influencing the local authorities, natural capital, nature recovery and landscape issues. Such an approach is likely to focus on the management of the natural environment and require good data to ensure effective decision making.



3.11. The least interactive policy is CE13 (Waste Management & the Circular Economy). This is because it has a simple, clear narrow focus. This is also true of CE9 (Problem Species, Pests & Diseases), CE11 (Major Development), and CE12 (Development Priorities & Evidence of Need). They, too, focus on a single task.

Findings

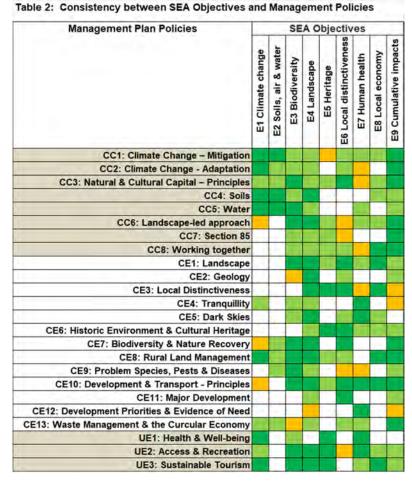
3.12. As there is compatibility between all the policies, there is no need to consider measures to reduce any tensions or sensitivities.

Aims	Policy	CC1	CC2	CC3	CC4	CCS	900	CC7	20 1	E	CE2	E3	CE4	CE5	CE6	CE7	CE8	CE9	CE10	CE11	CE13	UE1	UE2	E3
	CC1: Climate Change - Mitigation	1																						
	CC2: Climate Change - Adaptation		1																					
	CC3: Natural & Cultural Capital - Principles			1																				
CROSS CUTTING: Tackling 21st century issues	CC4: Soils				1																			
through progressive partnerships.	CC5: Water																							
	CC6: Landscape-led approach																							T
	CC7: Section 85														П									
	CC8: Working together																							
	CE1: Landscape																							
	CE2: Geology																							
	CE3: Local Distinctiveness																							
	CE4: Tranquillity																			1				
	CE5: Dark Skies													/										
001155015 0 511111105 1 A	CE6: Historic Environment & Cultural Heritage														/									
CONSERVE & ENHANCE: Influencing and delivering for landscape, nature and climate.	CE7: Biodiversity & Nature Recovery															/								
for landscape, flature and climate.	CE8: Rural Land Management																							
	CE9: Problem Species, Pests & Diseases																	1						
	CE10: Development & Transport - Principles																							
	CE11: Major Development																							
	CE12: Development Priorities & Evidence of Need															<u> </u>		.			1			
	CE13: Waste Management & the Circular Economy																							
	UE1: Health & Well-being																					1		
UNDERSTANDING & ENJOYMENT: Ensuring access,	UE2: Access & Recreation																							
earning and wellbeing opportunities are for everyone.	UE3: Sustainable Tourism																							
		CC1	CC2	cc3	CC4	SCS	900	200	3	E1	CE2	E3	CE4	CES	SE6	CE7	SE8	CE9	CE10	CE11	CE12	UE1	UE2	UE3

Consistency with SEA Objectives

- 3.14. The next task is to check the proposed intentions of the Management Plan against the SEA Environmental Objectives in a Consistency Matrix.
- there were any significant beneficial or adverse effects; and to gage the magnitude of that effect. Where appropriate, there is consideration as to whether the effect is reversible.

 Table 2 supports this analysis. We test the Management Plan Policies against the SEA Objectives.
- 3.16. Several positive
 relationships between the
 Management Plan Policies
 and the SEA Objectives
 stand out. SEA Objectives
 E4 (Landscape) and E9
 (Cumulative impacts) show
 mainly green squares,



indicating a strong or positive interaction with most management plan objectives. Management Plan Policies CC1 (Climate change mitigation) and CC3 (Natural & cultural capital) show a positive interaction with each SEA Objective.

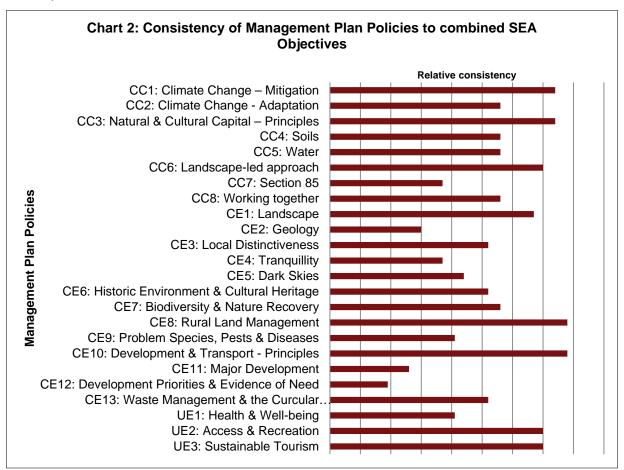
- 3.17. There are no negative impacts but there are some instances with no interactions, as shown by the white squares. Generally, there are very few of these. The exception is in columns E1 (Climate change) and E2 (Soils, air & water) where the white squares do stand out. This is due in part to the form of presentation, the white squares lie together in these columns and so seem dominant, but also, in the case of E2, to the very specific focus of the SEA Objective.
- 3.18. It is useful to consider the material in Table 2 in two ways. Firstly, to study the interactions of each plan policy against the combination of the SEA Objectives (**Chart 2**); and then of the combination of each policy against each SEA Objective (**Chart 3**).

Consistency of Management Plan Policies with combined SEA Objectives

3.19. Chart 2 shows that the policies with the greatest beneficial effect on the SEA Objectives are CE8 (Rural land management) and CE10 (Development & transport), followed closely by CC1 (Climate change mitigation), and CC3 (Natural & Cultural capital). Four other Management Plan Policies also show a strong interaction with the SEA Objectives. These are CC6 (Landscape-

led approach), CE1 (Landscape), UE2 (Access & recreation), and UE3 (Sustainable tourism). This suggests that these policies embrace a wide range of elements within their subject matter with good links to the three key issues that drive the Management Plan:

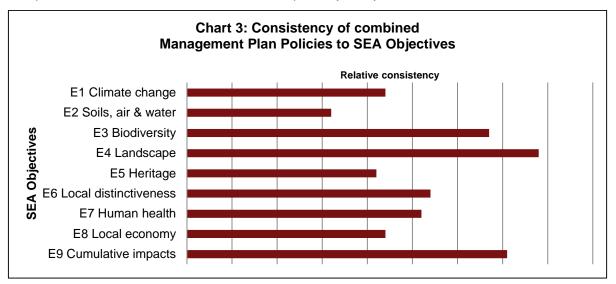
- The Climate Emergency
- · Nature's decline and the Ecological Crisis
- Health and societal changes
- 3.20. The least interactive policies are CE2 (Geology), CE11 (Major development), and CE12 (Development priorities & evidence of need). These policies are narrow and very specific in focus so their more limited interaction with the SEA Objectives in combination is no surprise. Exceptionally, CE13 (Waste management) shows a relatively high level of interaction with the SEA Objectives. Its relationships are not strong but there are links to most of the SEA Objectives.



Consistency of combined Management Plan Policies with SEA Objectives

3.21. Each SEA Objective gains strong support from the Management Plan Policies operating in combination (see Chart 3), there are no weak relationships. The greatest interaction is with SEA Objective E4 (Landscape). This is no surprise, as the Cotswolds National Landscape is a landscape designation. The strength of E6 (Local distinctiveness) also reflects the plans focus of enhancing the landscape. The strength of E9 (Cumulative impacts) suggests that the Management Plan Policies avoid significant adverse effects between their actions. This

objective considers the cumulative impacts within the plan and implies a balance between the policies that does not stand out in the compatibility analysis.



3.22. Given the emphasis of the Management Plan on the climate emergency, nature's decline and health, it is no surprise that E1 (Climate change), E3 (Biodiversity), and E7 (Human health) have a high level of interaction with the policies. E2 (Soils, air & water) is the least interactive SEA Objective. This is partly because the Management Plan identifies these elements as important but sets out a limited range of interventions. It will be for other bodies to set the environmental limits.

Findings

3.23. There are no adverse effects and some significant beneficial effects. There is no need to consider measures to increase the beneficial effects of the Management Plan policies.

Review of alternative policies

- 3.24. To meet with the requirements of the SEA Directive, the assessment needs to consider alternative options to determine whether the chosen pathway is the soundest in terms of the environment and wider sustainability. There is no record of any alterative options considered as a part of the management planning process.
- 3.25. In this situation, the approach is to compare the effect of the proposed policies with a 'do-nothing' scenario informed by the key issues identified in the SEA Scoping Report (as shown in Appendix 3). The task is to establish the environmental and sustainability benefits of the proposed policies over the 'do-nothing situation. This comparison is set out in Appendix 5 with an assessment for each trend.

Findings

3.26. The findings are that the proposed policies generally give greater environmental benefits than the 'do-nothing' situation, though there is not always a significant difference. The Management Plan adds value by delivering those elements that will not happen without coordinated action across the Cotswolds. The policy cascade in the plan addresses the three key issues identified as having a significant effect on achieving the purposes of designation:

- The Climate Emergency
- Nature's decline and the Ecological Crisis
- Health and societal changes
- 3.27. Many of the Management Plan policies are aspirational; they aim at a wide range of stakeholders who have differing priorities and scales of operation. The plan does not seek the lowest common denominator to secure buy-in, it aims to raise the bar. This supports long-term strategic development, as it will influence debate. However, a strategic plan should be detailed enough to either specifically outline actions required to meet the aims, or be able to lead directly to such actions. As presented, the plan is less clear about specific short-term interventions to tackle the identified challenges. Consequently, there is a risk of lost opportunities. It is not clear what will have changed by the time of the next review, in two years' time.
- 3.28. However, the focus is on the climate emergency, the ecological crisis and health and societal changes. This addresses the priorities set by Defra through its 25-year plan, A Green Future, and its landscapes review, the Glover Report. And it puts in place a strategy for responding to the challenges set out in the Environment Act 2021.
- 3.29. Much of the impact of the Management Plan will come from its influence on partners. Many of the actions require adoption by third parties. If the partners do not fully engage with the plan, then there will be only limited interventions within the National Landscape.

4. Monitoring

Monitoring of significant environmental effects

- 4.1. The SEA Regulations require monitoring measures for all the significant effects, both positive and negative, identified in the assessment. The SEA of the draft management plan has identified no significant adverse effects that are likely to arise from the implementation of management plan. Some significant positive effects are likely to arise from the implementation of the plan. The assessment has also identified some areas of uncertainty over the significance of some of the predicted effects and monitoring will cover these effects as well.
- **4.2.** There are likely to be several benefits in monitoring any environmental effects arising from the implementation of the management plan, including:
 - Identifying when action should be taken to reduce or offset any potential environmental effects of the plan;
 - Enhancing understanding of how the environment is changing in the National Landscape;
 - Tracking whether the plan has had any unforeseen environmental effects; and
 - Providing baseline data for future SEAs.

The advice is to incorporate the monitoring requirements of the SEA Regulations into a State of the AONB Report.

Monitoring Measures

4.3. The SEA Scoping Report identified 24 potential indicators to monitor the environmental effects of implementing the Management Plan. These are set out in **Appendices 4 and 6**.

Data limitations

- 4.4. There were some difficulties in securing all the data necessary for this assessment. This relates to the time available to search and secure data. There was only time to use existing data, it was not feasible to commission any new studies.
- 4.5. Strategic Assessment uses a combination of quantitative information from many sources (e.g., National Statistics and commissioned studies) and qualitative assessment using considered judgement. The qualitative approach is robust, given the strategic nature of the Management Plan. Detailed quantitative information relating to the effects of the plan is likely only to be available at a later stage.
- 4.6. Monitoring data are often subject to changes in methodology or reporting that may prevent the establishment of trend data from a known baseline date. Trend data and targets are the significant data gaps and these affect certain topics; in particular, effective and up-to-date reporting on the natural environment¹⁴. Pollution emission trends and aspects of air, soil (including contaminated land) and water quality are lacking. Consequently, the effects of diffuse pollution and other environmental impacts, such as recreation damage, are often difficult to ascertain.
- 4.7. Natural England's advice is to develop bespoke indicators to reflect the outcomes of National Landscape management decisions. The responsible authority agrees but it will take time to develop effective base-line data. The 2022/23 review is interim and does not involve a thorough review of monitoring indicators. This will be undertaken for the 2025 plan. Defra is currently working on a suite of national targets for protected landscapes. These cover the same three key areas of this plan, climate, nature and people. A monitoring framework, being developed by Natural England, will support these targets. This work will enable the development of relevant and supported indicators for the 2025 plan
- 4.8. Census statistics help paint a picture of the nation and how we live. They provide a detailed snapshot of the population and its characteristics, and underpin funding allocation to provide public services. The most up-to-date data is from 27 March 2011 though there are more recent mid-term labour market profiles for the local authority areas. This review cannot improve on the data presented since 2011 and can gain little from further analysis. There was a Census in 2021, and some headline data is available, but publication of small-area data is to be during 2023. It will be more fruitful to update the baseline after publication of the 2021 Census.

5. Technical review

5.1. The prime purpose of the SEA process is to review the potential impacts of the Management Plan on the key environmental aspects of the National Landscape. There is also a requirement, however, to monitor the implementation of the Management Plan and its impact on the environment over time. The baseline indicators (Appendix 4) were selected with this in mind. They are expected to be a part of the State of the AONB reporting; many are already a part of this reporting. The National Landscape Board must confirm its monitoring programme for the

¹⁴ Defra, Natural England, Historic England and the Environment Agency, provide data cut to national landscape boundaries each year through the June Survey of Agriculture and the 'monitoring environmental outcomes in protected landscapes' (MEOPL) programme.

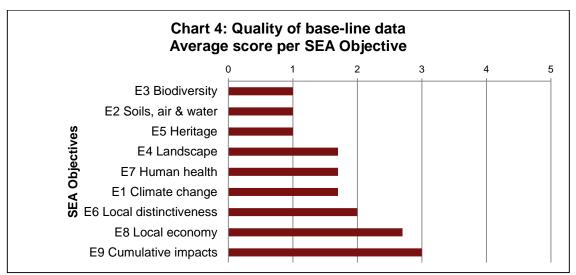
management plan, once adopted; and ensure that there is a collection programme to fully inform the next State of the AONB report.

Quality of existing baseline data

5.2. The assessment of the 24 SEA indicators is by a five-point quality scale. The analysis identifies where required data is weak or absent, so providing a framework for future data collection.

In	dicator 5-point o	uality scale
		Comment
1	Fit for purpose	
2	Adequate	Some minor improvements desirable
3	Indicative only	Not considered accurate
4	Inadequate	Little relevance to the AONB
5	Absent	No available data

- 5.3. The full assessment of each indicator against the nine SEA Objectives is set out in Appendix
 6. One indicator is absent. Due to a memory loss from the computer, the data for the fixed-point photography under E4 Landscape is missing. The process must start afresh. The methodology and protocols are in place and, when back on line, the indicator will be fit-for-purpose.
- 5.4. Of the 23 remaining SEA indicators, 61% are 'fit for purpose' (14 indicators) and 22% are 'adequate' (5 indicators). Of the remaining indicators, 13% (3 indicators) are indicative, and 4% (1 indicator) is inadequate. Chart 4 shows the assessment for each of the nine SEA Objectives.



5.5. Monitoring measures are strong. All are adequate, or better, except for E9 Cumulative impacts. This shows as indicative but monitoring for this topic is by other processes. These include annual reporting, the nature recovery dashboard, and the Cotswolds Natural Capital Atlas. The current indicators and the fixed-point photography (once reinstated) will deliver an effective monitoring framework.

6. Response to Environmental bodies comments

- 6.1. The statutory consultation bodies are Natural England, English Heritage and the Environment Agency. The SEA Environmental Report went out for consultation in February 2023 to which English Heritage and Natural England responded. A précis of the responses is set out in Appendix 7.
- 6.2. Historic England noted the reasonably proportionate assessment of the Interim Plan and its reassuring conclusions. Natural England noted that the assessment had considered its response to the Scoping Report and that it has no further comments to make.

7. Conclusion

- 7.1. The proposed Management Plan is an interim document; there will be a full review in two years' time. The plan has a cascade of three aims and 14 outcomes addressed through 24 policies. The proposed policies are compatible. There are no tensions or sensitivities arising from where two or more interact. The proposed policy cascade has a beneficial, and in parts, a significantly beneficial, effect on the SEA Environmental Objectives.
- 7.2. Each SEA Objective gains strong support from the Management Plan Policies operating in combination, there are no weak relationships. The greatest interaction is with SEA Objectives is to conserve and enhance landscape. This reflects that the Cotswolds is a landscape designation. A particularly welcome finding is the strength of managing cumulative impacts that suggests that the Management Plan Policies avoid significant adverse effects between their actions. Given the emphasis of the Management Plan on the climate emergency, nature's decline and health, it is no surprise that the SEA Objectives covering these topics gain strong support.
- 7.3. There are no adverse effects on the SEA Environmental Objectives so there is no need to consider measures to increase the beneficial effects. There is no recommendation for mitigating actions.
- 7.4. The proposed policies consistently give greater environmental benefits than the 'do-nothing' situation. In most cases, the benefits are only marginally better than the 'do-nothing' scenario. The plan deals with the key issues of climate change and nature recovery. Most of the actions mirror those of other players with the exception, perhaps, of natural and cultural accounting. But the policies address the key issue of health and societal change quite proactively. The plan sets out an engagement agenda with people who do not currently seek out the benefits of the landscape, whether they be residents or live in the surrounding areas. Other bodies do pursue such initiatives but the Management Plan is very clear about the needs and the means of satisfying them. It is not certain that other players would pick these up. The Plan adds value by delivering those elements that will not happen without coordinated action across the Cotswolds. The focus on the climate emergency, the ecological crisis and health and societal changes addresses the priorities set by Defra and responds to the challenges set out in the Environment Act 2021.
- 7.5. The overall assessment of the current baseline data is that it is good. There are opportunities to strengthen it further but the interim nature of this plan limits this. The Board will shortly be

- preparing a new Sate of the National Landscape report to inform the review of the full plan. This will result in a refreshed monitoring framework.
- 7.6. In conclusion: There is nothing in the management plan that will undermine the special qualities of the Cotswolds. Implementation of the proposed Management Plan will have environmental and sustainability benefits for the National Landscape.

Simon Smith,

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Northleach,
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GL54 3JH

Appendices

Appendix 1: Management Plan policy framework

Vision

A COTSWOLDS VISION: A NATIONAL LANDSCAPE FOR EVERYONE

A time of opportunity

The Cotswolds lifts our hearts and spirits; we feel better when we are here and engaged with the natural beauty of the landscape around us.

As we begin to slowly recover from the 2020 coronavirus pandemic, there has never been a time when we are so aware of the condition of our natural world, and its relationship to us and our own wellbeing. We believe the Cotswolds National Landscape offers opportunities for optimism, recovery, wellbeing, and inclusion.

The picture is not perfect...

Yet, all is not right: we are in the midst of a global climate emergency and an ecological crisis. Events in 2020 also highlighted ongoing social and economic inequalities. Here in the Cotswolds, these concerns are just as real for us too, and we face significant challenges: climate change; threats to wildlife and habitat; changes to the farming landscape and agriculture; finding ways to deliver opportunities for younger people and provide for an ageing population; and achieving access to, and involvement in, the countryside for everyone – and in ways which help benefit the countryside and encourages a diverse range of people to appreciate and care for the Cotswolds.

What can we do, and how should we do it?

To address these issues and begin to make improvements, we need to challenge ourselves – of that, there is no doubt. We mustn't fall into the trap of complacency, or afford ourselves the luxury of adhering rigidly to past beliefs – this will only hold us back, and limit how much positive change we can introduce.

Instead, we need to embrace new ways of thinking in order to find win-win solutions which both conserve and enhance the landscape, and serve the people who are here. We will work hard, and in partnership – to find outcomes which offer the most positive benefits and the least negative impact. We will need to demonstrate collaboration and leadership. We will need to be energetic and proactive. We will need to be bold, brave, and confident. Above all, we will need to acknowledge that we can't do it all alone – we want to work with other organisations and individuals to achieve results which benefit all of us, and nature.

The future should be bright

The treasured landscapes which make the Cotswolds nationally and internationally important are diverse in character, as are the people who live, work, and visit here. There is no one size fits all, nor a crystal ball, for the future – but we have a greater opportunity than ever before to pull together as communities across the Cotswolds, and to work with each other to harness our dedication and expertise to forge the future of the Cotswolds.

This place, the Cotswolds National Landscape, is for everyone, from all walks of life. In sharing it and looking after it, we will continue to create a place that is vibrant, unique, welcoming, and truly special – for people and for nature. We will work towards ensuring that the Cotswolds stays a working landscape, where agriculture thrives and supply chains are secure. Our communities should be connected and diverse, but self-sustaining. Visitors should feel welcome to enjoy being here, confident about access, and motivated to give something back to help look after this landscape. This should be a place where the landscape, nature, and people work in harmony with each other. The Cotswolds will be a place that will inspire generations of people to look after it – now and in the years ahead.

Aims & Policies

CROSS CUTTING AIM: Tackling 21st century issues through progressive partnerships.

POLICY CC1: Climate Change – Mitigation

- Greenhouse gas emissions should be minimised through a range of measures, including:
 - Reducing energy demand in existing and new buildings and infrastructure:
 - Improving energy efficiency, for example, by retrofitting existing buildings. Where traditional buildings including listed buildings are retrofitted, this must be undertaken by historic building specialists and in a manner that is compatible with the purpose of National Landscape (AONB) designation;
 - Reducing embodied carbon through secondary and recycled material use within all construction unless demonstrably unachievable on technical and practical grounds;
 - Utilising passive measures, for example the orientation of buildings and the provision of high levels of insulation;
 - Sustainable construction methods and management plans to reduce and manage construction waste should be implemented;
 - Incentivising voluntary sustainability standards, for example BREEAM, Building with Nature, and One Planet Living principles.
 - Reducing energy demand through transport and travel:
 - Reducing car use for example, through increasing green and active travel including public transport and Increasing shared mobility through car sharing schemes;
 - Reducing the need to travel for example by encouraging home working and affordable housing provision close to sources of employment, services and facilities;
 - Improving the sustainability of travel through for example;
 public transport hub promotion/ integration and information,
 and prioritising the provision of walking, cycling and public
 transport use, including adequate cycle parking
 - Providing sufficient infrastructure for the charging of electric vehicles, scooters and bikes;
 - Promoting messages aimed at minimising air travel by Cotswolds residents.
 - Generating energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation;
 - All developments, should have a net zero operational carbon balance and 100% energy provided by low carbon sources. Alternatives to fossil fuel energy sources should be used.
- Purchasing locally produced food products and services and encouraging small-scale vegetable growing in gardens and allotments.
- Climate change mitigation including the sequestration of carbon should be a key component of land management practices and Environmental Land Management, and rural development support mechanisms in the National Landscape.

	3.	Climate action should be undertaken in a way compatible with the conservation and enhancement of the natural beauty of the Cotswolds National Landscape.
POLICY CC2: Climate Change - Adaptation	1.	The risks posed by the consequences of climate change should be reduced through a range of adaptation measures, including those identified in relevant policies of this Management Plan.
	2.	Climate change adaption should be a significant driver in all new development, infrastructure and transport provision.
	3.	Climate change adaptation should be a key component of land management practices and future agri-environment/ELM (Environmental Land Management) schemes. Land management and rural development support mechanisms in the National Landscape.
	4.	Further research into the predicted impacts of climate change on the Cotswolds National Landscape should be undertaken. This research should be used to advise and inform sustained behavioural change to adapt to climate change and conserve and enhance the National Landscape and its special qualities.
POLICY CC3: Natural & Cultural Capital – Principles	1.	The natural and cultural capital of the Cotswolds National Landscape and the services they provide – should continue to be assessed and evaluated.
	2.	The use of natural and cultural capital accounting should be encouraged in order to fully understand the implications of investment, development and management decisions.
	3.	The financial and non-financial benefits of natural and cultural capital and the services they provide should be promoted.
	4.	Proposals affecting the Cotswolds National Landscape should have regard to – and seek to conserve and enhance – the natural and cultural capital of the National Landscape and the services they provide.
	5.	Natural and cultural capital and services they provide should be key components of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.
POLICY CC4: Soils	1.	Soil degradation should be halted and reversed by managing soils in a way that: (i) increases organic content, water retention and carbon sequestration; and (ii) minimises erosion, water pollution and compaction.
	2.	Soil management should remain a key component of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.
POLICY CC5: Water	1.	Water resources should be carefully managed and conserved to: improve water quality; ensure adequate aquifer recharge; ensure adequate river flows; and contribute to natural flood management systems.
	2.	Development (new and existing sites) should assess and minimise flood risk and implement Sustainable drainage schemes, adopt high water efficiency standards in line with RIBA 2030 Climate Challenge targets, and water conservation measures, for example rainwater harvesting and/or water recycling and grey water systems.
	3.	Sewerage pollution from storm overflows should be minimised and be within legal and regulatory requirements.
POLICY CC6: Developing a consistent, coordinated	1.	Stakeholders across the Cotswolds National Landscape should take a consistent and co-ordinated approach to conserving and enhancing the

and landscape-led approach		natural beauty of the National Landscape, including its special qualities and increasing the understanding and enjoyment of its special qualities.
POLICY CC7: Compliance with Section 85 of the Countryside and Rights of Way Act	1.	Relevant authorities, including public bodies, must comply with Section 85 of the Countryside and Rights of Way Act (the 'duty of regard') and should have regard to the supporting guidance published by Defra and Natural England.
POLICY CC8: Working together	1.	Stakeholders should work in partnership to support the purposes of conserving and enhancing the natural beauty of the Cotswolds National Landscape and increasing the understanding and enjoyment of its special qualities. Stakeholders should also cooperate in fostering the economic and social well-being of communities in and around the National Landscape.
	2.	Communities and businesses within and around the Cotswolds National Landscape should be encouraged to value and celebrate being part of a nationally recognised landscape and to contribute to the purpose of National Landscape (AONB) designation.
	3.	All relevant stakeholders should work together to ensure the successful implementation of the Landscapes Review proposals that Government identified as priority in its response to the review.
CONSERVE & ENHANCE	AIM:	Influencing and delivering for landscape, nature and climate.
POLICY CE1: Landscape	1.	Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds National Landscape, should have regard to, be compatible with and reinforce the landscape character of the location, as described by the Cotswolds Conservation Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.
	2.	Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds AONB, should have regard to the scenic quality of the location and its setting and ensure that views - including those into and out of the AONB – and visual amenity are conserved and enhanced.
	3.	Conserving and enhancing landscape character should be a key objective of future agri-environment/ELM (Environmental Land Management) schemes, land management and rural development support mechanisms in the Cotswolds National Landscape.
	4.	Rural skills training and the utilisation of those skills – such as dry stone walling, stone masonry, traditional woodland management and hedgelaying – will be supported, to ensure the long-term retention, creation and management of the key features of the Cotswolds National Landscape.
POLICY CE2: Geology	1.	Proposals that are likely to impact on the geological features of the Cotswolds National Landscape should have regard to these features and seek to conserve and enhance them.
	2.	The geological features of the Cotswolds National Landscape should be conserved and enhanced through effective management.
	3.	Opportunities should be sought to promote awareness and understanding of the geological features of the Cotswolds National Landscape.
	4.	Exploration and research into the geology of the Cotswolds National Landscape should be continued in order to improve understanding of the landscape, and of the geological resource and its importance to inform

	the conservation and management of geological and geomorphological sites.
POLICY CE3: Local Distinctiveness	Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape should have regard to, be compatible with and reinforce this local distinctiveness. This should include:
	 being compatible with the Cotswolds Conservation Board's Landscape Character Assessment, Landscape Strategy and Guidelines and Local Distinctiveness and Landscape Change;
	 being designed and, where relevant, landscaped to respect local settlement patterns, building styles, scale and materials and in accordance with design guidance prepared by local planning authorities;
	 using an appropriate colour of limestone to reflect local distinctiveness.
	 Innovative designs, compatible with the conservation of natural beauty – which are informed by local distinctiveness, character and scale – should be welcomed.
	 The development of design guidance – which is supported by a robust evidence base and which reflects relevant guidance published by the Cotswolds National Landscape Board – will be encouraged.
	4. Provision should be made for the quarrying of limestone, at an appropriate scale, in order to provide building materials that help maintain and enhance the local distinctiveness of the National Landscape. Any production of aggregate and agricultural lime should be secondary and necessary for local and necessary operational purposes. Any such mineral sites should be required to demonstrate that they do not have any significant adverse effects on the natural beauty of the National Landscape including its special qualities or the integrity of existing wildlife sites.
POLICY CE4: Tranquillity	Proposals that are likely to impact on the tranquillity of the Cotswolds National Landscape should have regard to this tranquillity, by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance.
	 Measures should be taken to enhance the tranquillity of the Cotswolds National Landscape by (i) removing and (ii) reducing existing sources of noise pollution and other aural and visual disturbance.
	 Proposals that are likely to impact on the tranquillity of the CNL should have regard to – and be compatible with – the National Landscapes Board's Tranquillity Position Statement.
POLICY CE5: Dark Skies	Proposals that are likely to impact on the dark skies of the Cotswolds National Landscape should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.
	2. Proposals that are likely to impact on the dark skies of the CNL should apply – and comply with – recognised standards and guidance, in particular, that published by the Institution of Lighting Professionals and the Commission for Dark Skies.
	3. Measures should be taken to increase the area of dark skies in the Cotswolds National Landscape by (i) removing and (ii) reducing existing sources of light pollution.

	4.	Consideration will be given to seeking a formal dark sky designation for
	4.	those parts of the Cotswolds National Landscape that are least affected by light pollution.
POLICY CE6: Historic Environment	1.	Proposals that are likely to impact on the historic and cultural heritage of the Cotswolds National Landscape should have regard to heritage assets and their setting and seek opportunities to conserve and enhance them. This should include respecting historical features, buildings, sites, layout and context, including the relationship between the existing feature or settlement and the landscape.
	2.	Heritage Impact Assessments should be used when considering any change to a heritage asset and to influence decisions regarding the management of the historic environment.
	3.	The historic environment and cultural heritage of the Cotswolds National Landscape, both designated and undesignated, should be conserved and enhanced through effective management.
	4.	Designated historic environment sites, such as scheduled monuments and listed buildings, and non-designated heritage assets of equivalent significance, should be protected, in line with national policy and guidance.
	5.	Historic environment and cultural heritage should be a key component of future agri-environment/ELM (Environmental Land Management) schemes, land management and rural development support mechanisms in the Cotswolds National Landscape.
	6.	Opportunities should be sought to promote the awareness, understanding and use of Historic Environment Records, Conservation Area Appraisals, Historic Landscape Characterisation and Heritage Strategies and Action Plans. These should be used to influence decisions regarding the management of the National Landscape's historic environment and cultural heritage.
	7.	The cultural heritage of the Cotswolds should be better understood and celebrated in arts, cultural, and social activities across the National Landscape.
POLICY CE7: Biodiversity and Nature Recovery	1.	Biodiversity (including the abundance of wildlife) in the Cotswolds National Landscape should be conserved and enhanced by establishing a coherent and resilient nature recovery network across the Cotswolds National Landscape and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and focus on the priority species and habitats listed in Appendix 7.
	2.	Policy and strategic documents that are likely to impact on the biodiversity of the National Landscape should have regard to – and be consistent with – the Cotswolds Nature Recovery Plan. This would include, but is not limited to, the following:
		i. Local Plans.
		ii. Neighbourhood Development Plans.
		iii. Green Infrastructure Strategies.
		iv. Tree and Woodland Strategies.
		v. Ecological Emergency and Climate Change Strategies.
		vi. Local Nature Recovery Strategies.
	3.	Proposals that are likely to impact on the biodiversity of the National Landscape should have regard to – and be consistent with – the

Cotswolds Nature Recovery Plan. This would include, but is not limited to, the following delivery mechanisms:

- Environmental Land Management Schemes and other grant schemes and rural development support mechanisms;
- ii. Biodiversity Net Gain;
- iii. Payment for Ecosystem Services including but not limited to carbon sequestration and storage, flood management, water supply and water quality improvements.
- 4. A mitigation hierarchy should be applied to development proposals whereby adverse impacts on biodiversity are: (i) avoided; (ii) mitigated; and (iii) compensated for. Development proposals should provide a netgain in biodiversity of at least 20% particularly with regard to the species and habitats listed in Appendix 7.
- Damage or loss of irreplaceable habitat should be avoided. Irreplaceable habitat includes but is not limited to:
 - 1 Ancient and veteran trees
 - 2 Ancient woodland (continually wooded since 1600);
 - 3 Ancient grassland (surviving since 1945)
- 6. Measures to conserve and restore biodiversity including the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan should be delivered in a way that is compatible with conserving and enhancing the natural beauty of the Cotswolds National Landscape.

POLICY CE8: Rural Land Management

- Rural land management in the Cotswolds National Landscape and in the setting of the National Landscape should have regard to – and help deliver – the purposes of conserving and enhancing the natural beauty of the National Landscape including its special qualities. It should also increase the understanding and enjoyment of the National Landscape's special qualities.
- 2. Rural land management in the Cotswolds National Landscape and in the setting of the National Landscape should have regard to and, ideally, help to deliver the Cotswolds National Landscape Management Plan. It should also be compatible with guidance produced by the Cotswolds Conservation Board, including the:
 - Cotswolds National Landscape Strategy and Guidelines;
 - ii. Cotswolds National Landscape Character Assessment;
 - iii. Cotswolds National Landscape Local Distinctiveness and Landscape Change;
 - iv. Cotswolds Conservation Board Position Statements.
 - v. Cotswolds Nature recovery Plan
 - vi. Cotswolds National Landscape Climate Change Strategy
- Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape should be designed specifically for the National Landscape. These mechanisms should:
 - i. address paragraphs 1 and 2, above;
 - ii. be managed locally to ensure effective local delivery;
 - iii. deliver public goods and services.

POLICY CE9: Problem Species, Pests and Diseases

- The population of grey squirrel and deer in the Cotswolds National Landscape should continue to be controlled and managed. This should be undertaken rigorously and coordinated at a landscape scale.
- 2. National guidance and guidance produced by the Board on Ash Dieback should be followed to ensure any measures implemented will conserve and enhance the qualities of the landscape.
- National and local guidance including guidance from Government
 Agencies and the Non Native Species Secretariat on invasive non-native
 species, pests and diseases should be followed and appropriate
 biosecurity measures promoted.

POLICY CE10: Development & Transport - Principles

- Development and transport proposals in the CNL and it setting should have regard to – and help to deliver - the purpose of conserving and enhancing the natural beauty of the CNL. In doing so, they should have regard to – and help to deliver – the Cotswolds AONB Management Plan and be compatible with guidance produced by the Cotswolds Conservation Board, including the:
 - (i) Cotswolds AONB Landscape Strategy and Guidelines;
 - (ii) Cotswolds AONB Landscape Character Assessment;
 - (iii) Cotswolds Nature Recovery Plan:
 - (iv) Cotswolds AONB Local Distinctiveness and Landscape Change;
 - (v) Cotswolds National Landscape Board's Position Statements.
- 2. Development and transport proposals in the CNL should, where appropriate, have regard to and help deliver the purpose of increasing the understanding and enjoyment of the CNL's special qualities. They should also contribute to the economic and social well-being of CNL communities, in a way that is compatible with conserving and enhancing the natural beauty of the CNL.
- Development and transport proposals in the CNL and its setting should comply with relevant national planning policy and guidance, particularly with regards to those paragraphs of the National Planning Policy Framework (NPPF) that explicitly relate to AONBs.
- 4. The purposes of conserving and enhancing the natural beauty of the Cotswolds AONB and increasing the understanding and enjoyment of the AONB's special qualities should be identified as strategic priorities in Local Plans, Neighbourhood Plans, Local Transport Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the Cotswolds AONB Management Plan as a material consideration.
- The cumulative impacts of development proposals on the natural beauty of the Cotswolds National Landscape should be fully assessed.
- 6. A landscape-led approach should be applied to development and transport proposals in the CNL and its setting, proportionate to the type and scale of development being proposed, whereby proposals:
 - a) address the natural beauty of the CNL as primary consideration at all stages of the development process (including design), from initial conception through to implementation;
 - addresses all of the factors that contribute to the natural beauty of the area;
 - address access to natural beauty including the character of the public rights of way network and its role within wider green infrastructure;

		d) reflect the character of the local area;
		e) avoid adverse effects where possible and, if adverse effects can't be avoided, minimise them; and
		f) deliver substantially more beneficial effects than adverse effects for the natural beauty of the CNL.
	Thi	landscape-led approach is particularly important for major development.
POLICY CE11: Major Development	1.	In line with national planning policy, permission should be refused for major development within the CNL other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.
	2.	Relevant stakeholders should fully assess relevant site allocations and development proposals to see if they constitute major development. In considering or deciding whether a proposed development constitutes major development, relevant stakeholders should have regard to the major development checklist in Appendix 5 of the Board's Landscape-led Development Position Statement.
	3.	Local authorities and other relevant stakeholders should explicitly state whether they consider relevant allocations and development proposals to be major development.
	4.	The mandatory major development 'tests' specified in paragraph 177 of the NPPF should be rigorously applied and documented for all allocations and development proposals that are deemed to be major development.
	5.	When relevant stakeholders are considering or applying the major development 'tests' specified in paragraph 177 of the National Planning Policy Framework (NPPF), it should be recognised that:
		 'exceptional need' does not necessarily equate to 'exceptional circumstances';
		 no permission should be given for major development save to the extent the development was needed in the public interest, met a need that could not be addressed elsewhere or in some other way and met that need in a way that to the extent possible, moderated detrimental effect on the environment, landscape and recreational opportunities.
	6.	When making decisions on major development proposals, local authorities (and / or other relevant decision makers) should not simply weigh all material considerations in a balance, but should refuse an application unless they meet the exceptional circumstances and public interest criteria.
POLICY CE12: Development Priorities & Evidence of Need	1.	Housing delivery in the Cotswolds National Landscape (CNL) should be focussed on meeting affordable housing requirements, particularly housing that is affordable in perpetuity such as social rented housing.
	2.	When local planning authorities are reviewing their Local Plans, they should give consideration to setting policies for affordable housing provision in the CNL that require:
		 at least 50% affordable housing in market housing developments;
		 100% affordable housing on Rural Exception Sites, with a lower percentage only being permitted in exceptional circumstances and the absolute minimum being 75%;

- on-site affordable housing provision for housing developments of five units or fewer.
- Priority should be given to maintaining and enhancing local community amenities and services and improving access to these amenities and services. Priority should also be given to supporting local employment opportunities.
- 4. It should be recognised that:
 - (a) The housing need figure derived from the Government's 'standard method' for calculating housing need is an unconstrained assessment of housing need and does not present a target for housing provision.
 - (b) The decision on how many homes should be planned for (i.e., the 'housing requirement' figure in Local Plans) should only be made after consideration of the constraints that the local authority faces, including the AONB designation, and consideration of the land that is actually available for development. As such, when these constraints are factored in, the 'housing requirement' could potentially be smaller than the standard method's 'housing need' figure.
 - (c) The application of national planning policies relating to AONBs may mean that it is not possible to meet objectively assessed needs (OAN) in full in local authority areas that overlap with the Cotswolds National Landscape (CNL).
 - (d) The CNL is unlikely to be a suitable area for accommodating unmet needs from adjoining, non-designated areas. In the context of the CNL, this includes unmet needs relating to adjacent urban areas and unmet needs arising in local authority areas that do not overlap with the CNL.
 - (e) Meeting housing need is never a reason to cause unacceptable harm to the CNL.
 - (f) The scale and extent of development in the CNL should be limited.
- Consideration should be given to whether the constraints relating to the AONB designation merit 'exceptional circumstances' which may justify using an alternative approach to the standard method for assessing housing need.
- 6. When the allocation of sites is being considered in the Local Plan process, regard should be given to the evidence of need specific to: (i) the settlement / parish where the allocation is being proposed; and (ii) the CNL 'sub-area' within which the allocation is being proposed.
- 7. Within the CNL, windfall housing proposals on undeveloped land adjoining, or outside of, built up area boundaries (or equivalent) should only be supported where there is robust evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement.
- 8. Where choice-based lettings systems, such as Homeseeker Plus, are used as part of the evidence base for affordable housing need:
 - the 'local connection' component of the choice-based lettings system should be applied consistently; and
 - data from the choice-based lettings systems should not be used explicitly as a measure of affordable housing need unless the

data has been verified and there is a clear local connection to and preference for - the settlement in question. 9. When local authorities are reviewing their Local Plans, they should give consideration to setting policies that ensure that new market housing is used as a principal residence rather than as a second home or holiday home. **POLICY CE13: Waste** Waste management should align with the following hierarchy, as set out Management and the in the Government's Waste Management Plan 2021: Circular Economy Prevention а b. Prepare for reuse c. Recycling d. Other recovery e. Disposal 2. Measures that help to deliver a circular, or closed-loop, economy, in which waste generation is avoided, should be encouraged. Proposals for new landfill sites and strategic waste facilities should not normally be permitted in the Cotswolds National Landscape, especially where they involve importing significant amounts of waste into the National landscape (for example, waste generated in neighbouring urban areas). Any waste management facilities that are permitted in the National Landscape should: (i) be sited in such a way that adverse environmental impacts are minimised, in line with relevant permitting regimes; and (ii) primarily to waste that arises within the National Landscape. (Within close proximity to the proposed facility). The management or use of waste by way of depositing it to land as an inert 'recovery' operation, land raising and bunding or for further restoration of previous landfill operations, should only be allowed: (i) in very limited circumstances within environmental limits: (ii) where it can demonstrate a significant net-benefit for the conservation and enhancement of the natural beauty of the National Landscape; and (iii) where it complies with the policies of the relevant Waste Local Plan and relevant environmental regulations. UNDERSTANDING & ENJOYMENT AIM: Ensuring access, learning and wellbeing opportunities are for everyone. **POLICY UE1: Health** Opportunities for improving health and wellbeing in the Cotswolds and Well-being National Landscape should be created, improved and promoted. including, where appropriate, the provision of: green spaces within easy reach of communities, walking, cycling and riding routes, including routes for the disabled; opportunities to access and interact with nature; and volunteering and personal development opportunities. 2. Children and young people resident within and around the National Landscape should be provided with environmental education opportunities to experience the Cotswolds National Landscape through direct contact with the natural environment. The health sector should make greater use of the benefits that the 3. National Landscape provides for the health and wellbeing of residents and visitors, for example, by prescribing exercise in the Cotswolds National Landscape countryside.

POLICY UE2: Access & Recreation

- A safe, pleasant, accessible, clearly waymarked and well-connected Public Rights of Way network should be maintained, enhanced and promoted across the Cotswolds National Landscape.
- Improvements to rights of way must be undertaken in a way that
 minimises any adverse effects on the natural beauty of the National
 Landscape and on its special qualities. Innovative ways of providing
 named routes without introducing additional signage should be explored.
- Open Access Land and other land, including Country Parks, that is open to public access should be maintained, enhanced and promoted across the Cotswolds National Landscape. Where appropriate, more land should be made available for public access.
- 4. Sustainable funding for National Trails, including the Cotswold Way and Thames Path, should be secured.
- Visitors, residents and local communities should be provided with opportunities to increase their understanding and enjoyment of the special qualities of the Cotswolds National Landscape.
- 6. A priority for engagement in the National Landscape should be communities from the surrounding urban areas, in particular those from areas of high deprivation and those that are not traditional visitors to the Cotswolds. Individuals from within the National Landscape who are not currently enjoying or engaged with the benefits of the landscape should also be a priority.
- 7. Easily accessible online and downloadable and onsite resources for walking, cycling, horse riding, volunteering and educational activities should be provided in the National Landscape to help promote access to the area and understanding and appreciation of its special qualities.
- 8. Visitor facilities and routes that are accessible to those of all abilities should be provided through improvements to infrastructure.
- Guided walks and activities for those who are not confident walking in the countryside should be provided to increase confidence and share knowledge of the national Landscape and its special qualities.
- 10. Arts and cultural experiences should be provided to encourage people to deepen their emotional connection to the landscape and support the engagement of new and existing audiences.
- 11. The Countryside code should be promoted to educate visitors and communities to act appropriately in the countryside and to improve understanding between visitors and those living and working in the area.
- 12. The provision of access and recreational opportunities should not have an adverse impact on the Cotswolds National Landscape. Where recreational use is having or is likely to have, an adverse impact on the special qualities of the National Landscape or on the integrity of existing wildlife sites, steps should be taken to evaluate, prevent or mitigate these impacts. Such steps can include enhanced maintenance and wayfinding, onsite engagement, legal restrictions, and the provision and promotion of access and recreational opportunities in new alternative suitable locations.

POLICY UE3: Sustainable Tourism

- Tourism within the Cotswolds National Landscape is delivered and managed in a way that minimises adverse effects on the natural beauty of the National Landscape and the emission of greenhouse gases.
- 2. Visitors, residents, local businesses and communities should be provided with opportunities to directly contribute to conserving and enhancing the natural beauty of the Cotswolds National Landscape and improve access

- to the area through local individual, community and employee volunteering opportunities.
- 3. The 'Caring for the Cotswolds' visitor giving scheme will raise awareness of the AONB and generate funds from visitors to directly help look after the Cotswolds National Landscape: by supporting projects which conserve habitats and species, look after heritage and landscape, improve access, and help provide education resources encouraging people to understand the landscape and nature better.
- 4. Visitors should be provided with a variety of accommodation options over a range of prices. The siting and design of visitor accommodation should be compatible with conserving and enhancing the natural beauty of the National Landscape including its special qualities.
- Air travel arising from the Cotswolds as a destination should be minimised.
- Existing sustainable and integrated transport initiatives should be supported and new initiatives developed to help facilitate the car free visitor experience.

Appendix 2: Other Plans and Policies

INTERNATIONAL

Ramsar Convention on Wetlands of International importance, especially waterfowl habitat (1971) www.ramsar.org

Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) (came into force on 1 June 1982)

www.coe.int/t/dg4/cultureheritage/nature/bern/default_en.asp

Paris Agreement United Nations Framework Convention on Climate Change (2015)

http://unfccc.int/paris_agreement/items/9485.php

EUROPEAN

The Birds Directive (Directive on Conservation of Wild Birds) (79/409/EEC) (Adopted 1979)

http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm

The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention) Council of Europe (121) 1985

http://conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=121&CM=1&CL=ENG

European Convention on the Protection of the Archaeological Heritage (revised 1985)

http://conventions.coe.int/Treaty/en/Treaties/Html/143.htm

Nitrates Directive (91/676/EEC) (1991)

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:1991:375:0001:0008:EN:PDF

The Habitats Directive (Directive on the Conservation of Natural Habitats and Wild Fauna and Flora) (Directive 92/43/EC) (1992)

http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

The Landfill Directive (99/31/EC) (1999)

http://ec.europa.eu/environment/waste/landfill_index.htm

The Water Framework Directive (2000/60/EC) (2000)

http://ec.europa.eu/environment/water/water-framework/index_en.html

The Strategic Environmental Assessment (SEA) Directive (2001/42/EC) (2001)

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2001:197:0030:0037:EN:PDF

The Environmental Noise Directive (2002/49/EC) (2002)

http://ec.europa.eu/environment/noise/directive.htm

The Landscape Convention 20 October 2000 (ratified by UK in November 2006)

www.coe.int/t/dg4/cultureheritage/heritage/landscape/default_en.asp

Renewed EU Sustainable Development Strategy (June 2006)

http://register.consilium.europa.eu/pdf/en/06/st10/st10917.en06.pdf

Our life insurance, our natural capital: an EU biodiversity strategy to 2020, European Commission (2011)

http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1_EN_ACT_part1_v7%5B1%5D.pdf

NATIONAL

Legislation

Historic Buildings and Ancient Monuments Act 1953

http://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents

Ancient Monuments and Archaeological Areas Act 1979

www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga 19790046 en.pdf

The Wildlife and Countryside Act 1981 (as amended)

www.legislation.gov.uk/ukpga/1981/69

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga_19900009_en.pdf

The Ancient Monuments (Class Consents) Order 1994 SI 1381

http://www.legislation.gov.uk/uksi/1994/1381/contents/made

Countryside and Rights of Way (CRoW) Act 2000

www.legislation.gov.uk/ukpga/2000/37/contents

Natural Environment & Rural Communities Act 2006

www.legislation.gov.uk/ukpga/2006/16/contents

Planning Act 2008

http://www.legislation.gov.uk/ukpga/2008/29/contents

Localism Act 2011

www.legislation.gov.uk/ukpga/2011/20/contents

Localism Act 2011

www.legislation.gov.uk/ukpga/2011/20/contents

The Conservation (Natural Habitats) Regulations 1994 (Habitats Regulation) as amended in 1997, 2000 (in England only) and 2017 (SI 1012)

https://www.legislation.gov.uk/uksi/2017/1012/contents/made

European Union (Notification of Withdrawal) Act 2017

www.legislation.gov.uk/ukpga/2017/9/pdfs/ukpga_20170009_en.pdf

National Planning Policy Framework (CLG 2019)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

Environment Act 2021

https://www.legislation.gov.uk/ukpga/2021/30/pdfs/ukpga_20210030_en.pdf

Policies, Strategies and Plans

Securing the Future – UK Government Sustainable Development Strategy (Defra 2005)

www.defra.gov.uk/publications/2011/03/25/securing-the-future-pb10589/

Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment (English Heritage 2008)

www.english-heritage.org.uk/content/publications/publicationsNew/guidelines-standards/conservation-principles-sustainable-management-historic-

environment/conservationprinciplespoliciesandguidanceapril08web.pdf

Water for people and the environment - Water Resources Strategy for England and Wales, Environment Agency 2009

http://a0768b4a8a31e106d8b0-50dc802554eb38a24458b98ff72d550b.r19.cf3.rackcdn.com/geho0309bpkx-e-e.pdf

Making Space for Nature: A review of England's Wildlife Sites and Ecological Network, (Chaired by Professor Sir John Lawton CBE FRS) Defra 2010

http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf

Biodiversity 2020: A strategy for England's wildlife and ecosystem services (Defra 2011)

www.defra.gov.uk/publications/2011/08/19/pb13583-biodiversity-strategy-2020/

Strategic Framework for Tourism in England 2010 - 2020 (Visit England 2011)

www.visitengland.org/strategicframework/

'The Natural Choice', the Natural Environment White Paper (Defra 2012)

www.defra.gov.uk/environment/natural/whitepaper/

Healthy lives, healthy people: Improving outcomes and supporting transparency (DH 2012) www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_132358

GPA2 Managing Significance in Decision-Taking in the Historic Environment Historic England (2015)

https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/

GPA3 The Setting of Heritage Assets Historic England (2017)

https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/

GP4: Enabling Development and the Conservation of Significant Places Historic England (2020)

https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/heag294-gpa4-enabling-development-and-heritage-assets/

National Character Area Profile: 107 Cotswolds (Natural England 2013)

Heritage 2020: strategic priorities for England's historic environment 2015-2020 Historic Environment Forum, March 2015

http://www.heritage2020.net/wp/wp-content/uploads/2016/10/Heritage2020-framework-text-2016-06-20 final.pdf

Tourism Action Plan, DCMS (August 2016)

https://www.gov.uk/government/publications/tourism-action-plan

Conservation 21: Natural England's conservation strategy for the 21st century – Natural England 2016

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/562046/conservation-21.pdf

Sustainability Appraisal and Strategic Environmental Assessment Historic England Advice Note 8, Historic England, December 2016

https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment/

Managing Local Authority Assets (Historic England, 2017)

https://historicengland.org.uk/images-books/publications/managing-local-authority-heritage-assets/heag152-managing-heritage-assets/

UK Climate change Risk Assessment (2017)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf

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Cotswold Water Park Nature Recovery Plan: guiding new and ongoing nature recovery and biodiversity enhancement initiatives across the Cotswold Water Park, as part of our response to the global climate and ecological emergencies. 2021 and beyond, Cotswold Water Park Nature Conservation Forum

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LOCAL

The AONB lies within the areas of 15 local authorities, albeit for some the area is small. Each produces strategies and plans that cover a similar range of topics that affect the AONB. Many of the policies are similar. All will need to be taken into account during the SEA process but for simplicity, only a sample are listed below.

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https://www.gloucestershire.gov.uk/media/2096569/mlp-for-glos-2018-2032-adopted-march-2020.pdf

Gloucestershire Waste Local Plan 2002 - 2012 Gloucestershire County Council (adopted 2004) http://www.gloucestershire.gov.uk/media/5853/adopted_gloucestershire_waste_local_plan_-2002_-_2012-22434.pdf

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https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/LocalTransportandConnectivityPlan.pdf

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Oxfordshire Energy Strategy, OxLEP (2020-2030)

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Warwickshire Local Transport Plan 2011 - 2026 Warwickshire County Council (2011)

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The Joint Municipal Waste Management Strategy for Herefordshire and Worcestershire 2004 - 2034 (first review 2011)

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Worcestershire County Council, Green Infrastructure Strategy 2013-2018 (2013)

http://www.worcestershire.gov.uk/downloads/file/3780/worcestershire_qi_strategy_document_2013-2018

UNITARY COUNCILS

Wiltshire Development Framework: Wiltshire Core Strategy (January 2015)

http://www.wiltshire.gov.uk/adopted-local-plan-jan16-low-res.pdf

Wiltshire & Swindon Minerals Core Strategy Development Plan Document 2006 – 2026 (June 2009)

http://www.wiltshire.gov.uk/minerals-core-strategy-june-2009.pdf

Wiltshire & Swindon Waste Core Strategy Development Plan Document (July 2009)

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South Gloucestershire Local Plan Core Strategy 2006 - 2027 (2013) – now developing a new plan – draft expected 2024

http://www.southglos.gov.uk/documents/cleanversionforinterimpublication2.pdf

Bath and North East Somerset Local Plan 2011 – 2029 Core Strategy (2014) and Place Making Plan (2017) – this is to be updated in 2025 with a full new plan to establish the planning framework for the district up to 2042.

http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/cs_pmp_vol_1_district-wide.pdf

DISTRICT & BOROUGH COUNCILS

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https://www.cotswold.gov.uk/media/vs4j4fmf/1-draft-green-infrastructure-strategy-draft-for-consultation-june-2021.pdf

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https://drive.google.com/file/d/17iRm-J0ATRfWKxID5WpCpo5guILB9WKs/view

The Cherwell Local Plan 2011 – 2031 Part 1 Adopted 20 July 2015 (incorporating Policy Bicester 13 re-adopted on 19 December 2016) (July 2015) – a new plan is in preparation that will address needs up to 2040.

https://www.cherwell.gov.uk/downloads/download/45/adopted-cherwell-local-plan-2011-2031-part-1-incorporating-policy-bicester-13-re-adopted-on-19-december-2016

Wychavon District Council - The South Worcestershire Development Plan 2006 to 2030 (2016)

https://www.wychavon.gov.uk/documents/10586/8274356/The_Adopted_SWDP_February_2016.pdf/c21ff9 5c-cb8f-4a86-ba04-1b5e43039005

Stratford on Avon Adopted Core Strategy 2011 -2031 (2016)

https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173518&name=SDC%20CORE%20STRATEGY%202011%202031%20July%202016.pdf

West Oxfordshire Local Plan 2031 West Oxfordshire District Council (2018)) – a new plan is in preparation that will address needs up to 2041.

https://www.westoxon.gov.uk/media/feyjmpen/local-plan.pdf

Stroud District Council Your District Your Future Stroud District Local Plan (2015)

https://www.stroud.gov.uk/media/1455/stroud-district-local-plan_november-2015_low-res_for-web.pdf

Appendix 3: Outline of future trends in the National Landscape

Key Issues

The Climate Emergency

Climate change is happening, and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and Special Qualities of the Cotswolds National Landscape.

Outcomes without mitigating actions

Energy supply requires more low carbon energy technologies, buildings need to become energy efficient, and infrastructure needs to be more resilient. Innovative solutions may lead to an erosion of vernacular design features that add to the special qualities of the National Landscape.

Changes in climate may have a significant impact on the area's internationally important beech woodlands. There may be a loss of nationally important mixed/oak woods and trees within parks through 'sudden oak death' and increased stress on veteran trees.

Drought conditions may cause stress on trees making them less resilient to storm events. There may be an increased risk of uprooting and increased fire risk.

Drier warmer summers may lead to a parched landscape of bleached grassland, 'thin' arable crops and wilting trees and hedges.

Warmer winters could promote increased tree growth, as well as the suitability of new non-native species or native species of a different provenance.

Other semi-natural habitats may deteriorate, including of unimproved limestone grassland with the spread of invasive species and a reduction in species diversity.

Climate change may result in the migration of new species moving north. This could see species diversity maintained but there is a risk of new plant and animal pests and diseases. These may have a harmful impact on landscape, biodiversity and the economy.

Droughts may cause rivers, lakes and streams to dry up, which will affect wildlife, agriculture and tourism. There is the risk of reduced nectar production in response to drought in grassland wildflowers.

Heavier rainfall may lead to an increase in surface water flooding and soil erosion. Without adaption to farming practices, there may be a decline in soil quality/nutrient levels, soil loss to erosion, release of carbon from soils and timber, a reduction in water quality and increased flooding.

A longer growing season with increasing temperatures may encourage the expansion of arable production, putting more easily cultivated areas of pasture under pressure.

Higher temperatures may also encourage the introduction of new crops into the landscape, as well as different crop timings. This may impact on the special qualities of the National Landscape.

A longer growing season could see an increase in timber and biomass production that will increase carbon capture and support nature recovery.

Unplanned or controlled mitigation actions could negatively impact on the special qualities. Examples include the loss of characteristic habitats with the conversion to new biomass crops for energy production and greater tree planting.

Nature's decline and the Ecological Crisis

Wildlife loss is well documented and understood. Climate change is threatening the loss of already diminished wildlife at an even greater scale and pace. There is a need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. The need for action is urgent to avoid a mass extinction event.

Habitats will remain isolated with no 'corridors' to allow species to adjust naturally to climate change by moving northwards to a new ecological niche. Some populations will become too small to remain viable and species will be unable to adapt by adjusting to new climatic conditions without large and varied sites.

Chalara ash die back will have a considerable effect upon the area's habitats, landscape character and landscape integrity. Individual hedge-row trees are important in the Cotswolds dip slope landscape, many of which are ash and vulnerable to ash dieback. Their loss could have a significant impact on this landscape setting.

Invasive non-native species currently include Himalayan balsam and New Zealand Pygmy Weed in rivers and ponds, and Holm oak and cotoneaster on species rich grassland. Biodiversity will reduce if their spread is not checked.

Degraded ecosystems will not deliver benefits to people (ecosystem services). These services are critically important to the wellbeing and economy of people living in and around the Cotswolds. For example, they deliver good quality water and food, spiritual refreshment and a sense of history and cultural heritage.

Health and societal changes

The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The COVID-19 pandemic has had a significant impact on human behaviour. For example, people have travelled less and many have worked from home. People are more aware of the importance of green and blue spaces.

People will not feel welcome and currently underrepresented groups will be unable to enjoy the benefits of accessing natural beauty.

The bond between people and place will break down due to a reduced functional relationship.

Communities will lose their links to the land and will not benefit from a natural environment that brings economic benefits and supports livelihoods

Appendix 4: SEA Objectives and baseline data

Sust	Sustainability Appraisal Framework					
Nº	Environmental Objectives	Will the plan help to?	Headline indicators (24)			
E1	Climate change Address the causes and consequences of climate change	 reduce greenhouse gas emissions Increase greenhouse gas capture and storage through land management increase cycling and walking maximise the role of soil as a carbon store increase recycling increase the renewable energy capacity ensure tourism is compatible with the climate change agenda improve energy efficiency improve public transport deliver a more sustainable pattern of transport 	 Increase in renewable energy capacity permitted/constructed Area at risk from flooding Carbon stored by habitats 			
E2	Soils, Air and Water	 reduce soil compaction reduce leaching of nutrients and organic matter prevent soil erosion increase soil organic matter and carbon storage avoid soil sealing, prevent soil contamination, improve water quality maintain and enhance air quality meet national air quality standards promote sustainable water resource management encourage a catchment-based approach to addressing water issues maintain natural river geomorphologies reduce nutrient-rich run-off protect drinking water manage flood risk increase use of sustainable drainage systems improve efficiency in use of water 	WFD quality of the water environment data			

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E3	Protect and enhance biodiversity habitats and species	 prevent loss of key species prevent loss of habitat Increase area and connectivity of habitat improve management, linkage and condition of designated and undesignated habitats maintain integrity of current ecological networks create opportunities to enhance biodiversity safeguard options for future habitat connectivity prevent pollution maintain and enhance access to sites whilst avoiding and reducing adverse impacts support agricultural activities whilst avoiding and reducing adverse impacts 	5. 6. 7. 8.	Change in condition of biological, geological and geomorphological SSSIs in the area Change in extent of habitat Priority habitats in SSSIs Change in the % of the area that is woodland
E4	Protect and enhance the landscape	conserve and enhance visual amenity conserve and enhance landscape character conserve and enhance townscape character conserve geodiversity avoid the loss of the best and most versatile agricultural land ensure the sustainable use of mineral resources including the use of recycled and secondary aggregates		Changes to the landscape via fixed point photography of key views Light pollution maps Road noise maps
E5	Sustain and enhance cultural heritage, including heritage assets and their settings	conserve and enhance architectural heritage conserve and enhance archaeological heritage (including unknown) conserve and enhance cultural heritage reduce risks to heritage improve access to historic places for residents and visitors enhance local distinctiveness	13. 14.	Change in number of heritage assets Number of heritage assets at risk Change in condition of Scheduled Monuments Change in number of buildings on the 'Buildings at Risk Register'
E6	Local Distinctiveness	 ensure any new developments or redevelopments are in keeping with local character take account of the environment in design and construction 	17.	Number of the area's defined special qualities monitored Number of planning authorities with vernacular design guidance mentioning the Cotswolds % of development decisions against Board advice

E7	Safeguard and	reduce and avoid noise pollution	19. Access to open space
	enhance human health	reduce and avoid light pollution	20. Deprivation statistics
		 avoid impacts on the quality and extent of existing green infrastructure as a recreational asset 	21. Life expectancy
		support the provision of affordable housing	
		 improve access to services 	
		 improve access to employment 	
		improve access for outdoor recreation	
		retain and enhance sustainable transport to and from market towns	
		promote art, craft and cultural interests	
		improve safety	
E8	To support a locally embedded economy	avoid the loss of local jobs and local services	22. Number of visitors23. Numbers employed in tourism
		promote economic activity that adds value to local products and helps support the conservation of the area's special qualities	24. Numbers employed in agriculture
		increase availability of locally sourced food	
		support the long-term viability of commercial activities, including agriculture and tourism	
		promote a career in land-based and traditional building skills	
		encourage apprenticeships and training	
E9	Cumulative Impacts	promote the importance of environmental services	No indicator but monitored through annual reporting, the nature
	Avoid significant adverse effects between the above	moderate the interaction between natural, social and economic actions	recovery dashboard, and the Cotswolds Natural Capital Atlas
	interrelationships	in combination with another policy, does it prejudice the achievement of any of the SEA Objectives	

Appendix 5: Review of alternative policies

Table 1: The Climate Emergency

Climate change is happening, and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and Special Qualities of the Cotswolds National Landscape.

the Cotswolds National Landscape.			
Management Plan Policies	Benefits of the proposed policies	Do nothing situation	
POLICY CC1: Climate Change – Mitigation POLICY CC2: Climate Change - Adaptation	A strong desire to tackle the climate emergency though the plan can only advocate actions. Will support the adoption of development policies and land management practices in response to climate change. However, most of the policy statements are aspirations intended to encourage others to act. It may provide material to support policy decisions.	Minimal, as Defra, its agencies, and the local authorities have policies that achieve the same outcome. Third sector bodies advocate similar approaches.	
POLICY CC3: Natural & Cultural Capital – Principles	Initiatives to assess and evaluate natural capital may secure data that will inform climate policy development.	Uncertain, as Natural England or other bodies may undertake such studies.	
POLICY CC4: Soils	Advocating carbon sequestration will help reduce the impacts on climate.	Minimal, as Defra and its agencies have policies that achieve the same outcome.	
POLICY CC5: Water	Advocating the adoption of high-water efficiency standards in line with RIBA 2030 Climate Challenge targets will help address the Climate Emergency.	Uncertain, as the Planning Authorities regulate development and may also have the same policy.	
POLICY CC6: Developing a consistent, coordinated and landscape-led approach	Uncertain, as the policy emphasises natural beauty and the special qualities rather than the management plan polices. None-the-less, a coordinated landscapeled approach is essential if climate issues are to be addressed.	Uncertain, as Natural England and third sector bodies may undertake such initiatives. However, there may not be the area-wide focus and opportunities may be lost.	
POLICY CC7: Compliance with Section 85 of the Countryside and Rights of Way Act	Neutral	Neutral	
POLICY CC8: Working together	As framed, the policy focuses on securing the purposes of designation and their review. There may be a benefit as the management plan identifies climate change as a key issue; this is likely to be a subject for networking.	Minimal, as local authorities and third sector bodies create and support a series of networks, some of which consider climate change.	
POLICY CE1: Landscape	Neutral	Neutral	
POLICY CE2: Geology	Neutral	Neutral	
POLICY CE3: Local Distinctiveness	Neutral	Neutral	

POLICY CE4: Tranquillity	Initiatives that reduce traffic noise may also reduce pollution that drives climate change.	Minimal, as HM Government and the local authorities have policies that achieve the same outcome.	
POLICY CE5: Dark Skies	Neutral	Neutral	
POLICY CE6: Historic Environment	Neutral	Neutral	
POLICY CE7: Biodiversity and Nature Recovery			
POLICY CE8: Rural Land Management	Though not focused on nature recovery, the policy promotes the Cotswolds National Landscape Climate Change Strategy.	Minimal, as Defra and its agencies have policies that achieve the same outcome.	
POLICY CE9: Problem Species, Pests and Diseases	Neutral	Neutral	
POLICY CE10: Development & Transport - Principles	Assessing the cumulative impacts of proposals will help monitor contributions to climate change.	Minimal, as the Planning Authorities regulate development and may	
POLICY CE11: Major Development	Neutral	have the relevant climate policies.	
POLICY CE12: Development Priorities & Evidence of Need	Neutral	Neutral	
POLICY CE13: Waste Management and the Circular Economy	Encouraging recycling and the minimal movement of waste will help reduce climate impacts.	Minimal, as the Mineral and Waste Authorities regulate development and may have the relevant climate policies.	
POLICY UE1: Health and Wellbeing	Encouraging walking, cycling and riding may reduce the use of motor vehicles;	Uncertain, as Natural England, local	
POLICY UE2: Access & Recreation	such an outcome would reduce impacts on climate.	authorities and third sector bodies may undertake such initiatives. However, there may not be the area-wide focus and opportunities may be lost.	
POLICY UE3: Sustainable Tourism	A limited impact but includes the aspiration to reduce air travel. This will be by promoting messages aimed at minimising air travel by Cotswolds residents.	Uncertain, as DCMS, its agencies, and the local authorities have policies that could minimise the impact of tourism on the climate.	

There are many organisations that have the opportunity, authority and resources to take meaningful actions. However, the proposed polices offer some advantages over the do-nothing option as they support an area-wide approach. Others will also take this initiative but without coordination, opportunities may be lost.

Table 2: Nature's decline and the Ecological Crisis

Wildlife loss is well documented and understood. Climate change is threatening the loss of already diminished wildlife at an even greater scale and pace. There is a need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. The need for action is urgent to avoid a mass extinction event

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Management Plan Policies	Benefits of the proposed policies	Do nothing situation		
POLICY CC1: Climate Change – Mitigation POLICY CC2: Climate Change - Adaptation	Initiatives to save energy and reduce carbon will slow the decline of nature. However, most of the policy statements are aspirations intended to encourage others to act.	Minimal, as HM Government and the local authorities have policies that achieve the same outcome. Third sector bodies advocate similar approaches.		
POLICY CC3: Natural & Cultural Capital – Principles	Initiatives to assess and evaluate natural capital will help justify the development of nature recovery initiatives.	Uncertain, as Natural England or other bodies may undertake such studies.		
POLICY CC4: Soils	Mixed, the policy seeks to halt soil degradation. Soil is an important component of the natural environment. Degraded soil is detrimental to commercial use but may be beneficial for wildlife. Nutrient rich soils favour vigorous species.	Minimal, as Defra, its agencies, and the local authorities have policies that achieve the same outcome. Third sector bodies advocate similar approaches.		
POLICY CC5: Water	Supporting natural flood management systems and reducing pollution from storm overflows will support nature recovery.	Minimal, as Defra, its agencies, and the local authorities have policies that achieve the same outcome.		
POLICY CC6: Developing a consistent, coordinated and landscape-led approach	Landscape scale initiatives are essential for the development of nature recovery networks.	Uncertain, as Natural England or other bodies may develop similar initiatives but opportunities may be missed.		
POLICY CC7: Compliance with Section 85 of the Countryside and Rights of Way Act	Neutral	Neutral		
POLICY CC8: Working together	As framed, the policy focuses on securing the purposes of designation and their review. There may be a benefit as the management plan identifies the ecological crisis as a key issue; this is likely to be a subject for networking.	Minimal, as local authorities and third sector bodies create and support a series of networks, some of which consider nature recovery. Natural England is developing strategies to lead on nature recovery		
		but will need active local partners.		

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POLICY CE1: Landscape	Maintain landscape character will have the effect of supporting natural habitats, as, to a lesser extent, will the support for traditional rural skills.	Less beneficial as there may be less coordination of actions across the whole area.
POLICY CE2: Geology	Geological and geomorphological sites offer some benefits to nature but this is not the focus of the policy.	Natural England has designated the important sites as SSSIs and uses regulation to ensure their management.
POLICY CE3: Local Distinctiveness	Neutral	Neutral
POLICY CE4: Tranquillity	Cutting sources of noise pollution and other aural and visual disturbance will offer some help to fauna.	Less beneficial as securing tranquillity will be less of a priority for other bodies.
POLICY CE5: Dark Skies	Increasing the area of dark skies and cutting existing sources of light pollution will benefit fauna, especially bats.	Less beneficial as securing Dark Sky status will be less of a priority for other bodies.
POLICY CE6: Historic Environment	Neutral	Neutral
POLICY CE7: Biodiversity and Nature Recovery	Strong support for nature recovery.	Uncertain, as Natural England or other bodies may develop similar initiatives but opportunities may be missed.
POLICY CE8: Rural Land Management	Though not focused on nature recovery, the policy does highlight the Cotswolds Nature Recovery Plan and seeks to deliver public goods and service, which will include biodiversity.	Minimal, as Defra and its agencies have policies that achieve the same outcome.
POLICY CE9: Problem Species, Pests and Diseases	Will help to control invasive non-native species and so help maintain the resilience of ecosystems.	Uncertain, as Natural England or other bodies may develop similar initiatives but opportunities may be missed.
POLICY CE10: Development & Transport - Principles	Neutral	Minimal, as the Planning Authorities regulate
POLICY CE11: Major Development		development and may have the relevant ecological policies.
POLICY CE12: Development Priorities & Evidence of Need	Neutral	Neutral
POLICY CE13: Waste Management and the Circular Economy	Neutral	Neutral

POLICY UE1: Health and Wellbeing	Providing environmental education opportunities to experience the Cotswolds National Landscape through direct contact with the natural environment should generate support for nature recovery actions in the future.	Less beneficial but local authorities and third sector bodies will have similar initiatives.
POLICY UE2: Access & Recreation	Promotion of the countryside code may deliver benefits for nature.	Limited, as Natural England or other bodies may develop similar initiatives.
POLICY UE3: Sustainable Tourism	Significant benefits to nature through the reduction in greenhouse gases and the promotion of the 'Caring for the Cotswolds' scheme. A specific target is the conservation of habitats and species.	Less beneficial, as Natural England or other bodies may promote similar initiatives. However, they may not coordinate the 'Caring for the Cotswolds' initiative.

There are many organisations that have the opportunity, authority and resources to take meaningful actions. However, the proposed polices offer advantages over the do-nothing option as they support an area-wide approach. On occasion there are material additional benefits, others will pursue actions but without coordination, opportunities may be lost.

Table 3: Health and societal changes

The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The COVID-19 pandemic has had a significant impact on human behaviour. For example, people have travelled less and many have worked from home. People are more aware of the importance of green and blue spaces.

Management Plan Policies	Benefits of the proposed policies	Do nothing situation	
POLICY CC1: Climate Change – Mitigation	Encouraging building practices that make homes warmer and encourage households to grow vegetables will have health benefits	Marginally less beneficial. Local authorities will have policies on energy use but may not encourage horticulture.	
POLICY CC2: Climate Change - Adaptation	Neutral	Neutral	
POLICY CC3: Natural & Cultural Capital – Principles	An emphasis on natural and cultural capital and services will include the health benefits derived from the environment.	Natural England and others may undertake similar work but it is likely to be more generic.	
POLICY CC4: Soils	Minimising erosion and water pollution will have some health benefits.	Minimal, as Defra, its agencies, and the local authorities have policies that achieve the same outcome.	
POLICY CC5: Water	Supporting natural flood management systems and reducing pollution from storm overflows will have some health benefits.	Minimal, as Defra, its agencies, and the local authorities have policies that achieve the same outcome.	

POLICY CC6: Developing a consistent, coordinated and landscape-led approach	Neutral	Neutral
POLICY CC7: Compliance with Section 85 of the Countryside and Rights of Way Act	Neutral	Neutral
POLICY CC8: Working together	Encouraging people to value and celebrate being part of a nationally recognised landscape and increasing the understanding and enjoyment of its special qualities will make people feel more we. The policy also reminds stakeholders to foster the economic and social well-being of communities.	Uncertain, as health bodies, local authorities and third sector bodies create and support a series of networks, some of which consider green proscribing.
POLICY CE1: Landscape	Neutral	Neutral
POLICY CE2: Geology	Neutral	Neutral
POLICY CE3: Local Distinctiveness	Neutral	Neutral
POLICY CE4: Tranquillity	Cutting sources of noise pollution and other aural and visual disturbance may increase the health benefits from a visit in the area.	Less beneficial as securing tranquillity will be less of a priority for other bodies.
POLICY CE5: Dark Skies	Increasing the area of dark skies and cutting existing sources of light pollution may help people enjoy the wonders of the night sky; though the lack of lighting may make people feel unsafe at night.	Less beneficial as securing Dark Sky status will be less of a priority for other bodies.
POLICY CE6: Historic Environment	The policy will help secure the proper management of heritage assets but there is no mention of access to or interpretation of these assets. Health benefits will be tangential.	Historic England and third sector bodies will promote access opportunities, which will have an effect of improving people's health.
POLICY CE7: Biodiversity and Nature Recovery	The policy will help secure nature recovery but there is no mention of access to or interpretation of nature. Health benefits will be tangential	Natural England and third sector bodies will promote access opportunities, which will have an effect of improving people's health.
POLICY CE8: Rural Land Management	Though not focused on nature recovery, the policy does seek to deliver public goods and service, which will include health and well-being.	Minimal, as Defra and its agencies have policies that achieve the same outcome.
POLICY CE9: Problem Species, Pests and Diseases	Neutral	Neutral
POLICY CE10: Development & Transport - Principles	Strong support for health with an emphasis on contributing to the well-being of local communities; and to encouraging access to natural beauty and the countryside.	Minimal, as the Planning Authorities regulate development and will have similar social and access policies.

POLICY CE11: Major Development	Neutral	Neutral
POLICY CE12: Development Priorities & Evidence of Need	Significant health and societal benefits. There is a focus on meeting affordable housing requirements, particularly housing that is affordable in perpetuity such as social rented housing.	Uncertain, as the Planning Authorities regulate development and will have similar housing policies. However, their priorities may be in communities away from the Cotswolds.
POLICY CE13: Waste Management and the Circular Economy	Neutral	Neutral
POLICY UE1: Health and Wellbeing	Significant health and societal benefits. Not only does the policy advocate greater access to green spaces near to communities, it seeks to encourage children and young people in, and from the surrounding areas, to enjoy environmental education opportunities through direct contact with the natural environment. And there is a call for the health sector to make greater use of the benefits that the National Landscape through green prescribing.	Less beneficial but health bodies, local authorities and third sector bodies will support similar initiatives, some of which consider green proscribing. The difficulty will be a lack of coordination when there is a need for active interventions.
POLICY UE2: Access & Recreation	Significant health and societal benefits. The policy seeks to increase and enhance public access across the landscape. There is a priority to engage with communities from the surrounding urban areas, particularly those from areas of high deprivation and those that are not traditional visitors to the Cotswolds. Individuals from within the area who are not currently enjoying or engaged with the benefits of the landscape should also be a priority.	Less beneficial but health bodies, local authorities and third sector bodies will support similar initiatives. The difficulty will be a lack of coordination when there is a need for active interventions.
POLICY UE3: Sustainable Tourism	Some limited benefits through the development of volunteering opportunities that give access to the area.	Uncertain, health tourism is a growing market and there may be initiatives by the destination management organisations and the private sector.
There are many organisations th	at have the opportunity, authority and resource	private sector.

There are many organisations that have the opportunity, authority and resources to take meaningful actions. However, the proposed polices offer advantages over the do-nothing option as there are specific initiatives to engage with 'new' communities and to support improved access. On occasion there are material additional benefits, others will pursue actions but without coordination, opportunities may be lost.

Appendix 6: SEA Objectives and links to data monitoring

	Indicator 5-point quality scale			
	Score		Comment	
1		Fit for purpose		
2		Adequate	Some mi	inor improvements desirable
	3	Indicative only	Not cons	idered accurate
	4	Inadequate		evance to the National
			Landscape	
	SEA Objectives	Absent SEA Indicators (24)	No available data Quality Comment	
E1	Climate change Address the causes and	Increase in renewable energy capacity	3	Comment 2008/16 data
	consequences of climate	permitted/constructed		
	change	Area at risk from flooding	1	2022 Screenshot
		Carbon stored by habitats	1	2021 data
E2	Soils, Air and Water	WFD quality of the water environment data	1	From MEOPL cut to boundary
E3	Protect and enhance biodiversity habitats and species	Change in condition of biological, geological and geomorphological SSSIs in the area	1	From MEOPL cut to boundary
		Change in extent of habitat	1	2021 data
		Priority habitats in SSSIs	1	From MEOPL cut to boundary
		Change in the % of area that is woodland	1	From MEOPL cut to boundary
E4	Protect and enhance the landscape	Changes to the landscape via fixed point photography of key views	5	Data lost and need to start afresh. Methodology in place to link to monitoring.
		Light pollution maps	1	2021 Screenshot
		Road noise maps	1	2022 Screenshot
E5	Sustain and enhance cultural heritage, including	Change in number of heritage assets	1	From MEOPL cut to boundary
	heritage assets and their settings	Number of heritage assets at risk	1	HE cut to boundary
		Change in condition of Scheduled Monuments	1	From MEOPL cut to boundary
		Change in number of buildings on the 'Buildings at Risk Register'	1	From MEOPL cut to boundary
E6	Local Distinctiveness	Number of the area's defined special qualities monitored	2	Half the special qualities have indictors in this table
		Number of planning authorities with vernacular design guidance mentioning the Cotswolds	2	Not something that is regularly monitored

		% of development decisions against Board advice	2	All consultations and advice listed but no record of responses.
E7	Safeguard and enhance human health	Access to open space	1	From MEOPL cut to boundary
		Deprivation statistics	2	Awaiting release of 2021 Census data
		Life expectancy	2	Awaiting release of 2021 Census data
E8	Support a locally embedded economy	Number of visitors	3	2019 data
		Numbers employed in tourism	4	2015 data for Cotswold DC
		Numbers employed in agriculture	1	Defra June Survey of Agriculture
E9	Cumulative Impacts – to avoid significant adverse effects between the above interrelationships	No indicator	3	Monitored through annual reporting, the nature recovery dashboard, and the Cotswolds Natural Capital Atlas

Appendix 7: Précis of consultation responses

Environment Agency

No comments recorded.

Historic England

22nd February 2023

Hello Paul, for you for sharing the draft Environmental Report.

I note the reasonably proportionate assessment of the Interim Plan and its reassuring conclusions.

Rohan Torkildsen

Partnerships Team Leader South West.

Historic Environment Planning Advisor South West.

Natural England

16th March 2023

Thank you for your consultation dated and received by Natural England on 14 February 2023. We note that the revised Interim Management Plan Review (2023/25) - Strategic Environmental Assessment (SEA) Environmental Report has taken into account the comments we made in our response dated the 7 February 2023 and we have no further comments to make.

Ms Gillian Driver

Lead Adviser

Land use planning – West Midlands Area Team