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Environmental Policy  
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April 23<sup>rd</sup> 2010.

Dear Jane,

### **Trees and Woodland in Worcestershire, Biodiversity and Landscape Guidelines for their Planting and Management.**

The Landscape Character Assessments for The Cotswolds AONB and Worcestershire have been produced using different methodologies but are broadly compatible when considering the Cotswolds AONB. There are, however, differences in defining landscape types and this is particularly evident for Bredon Hill. There are also differences and conflicts between the two sets of guidelines. This situation needs to be resolved to prevent confusion or the playing off of one set of guidelines against another.

#### **Background to comments.**

In 2004 a Landscape Character Assessment (LCA) was completed for the Cotswolds Area of Outstanding Natural Beauty, using the then new methodology adopted by the Countryside Agency and Scottish Natural Heritage. Subsequently, a fairly comprehensive set of landscape strategies and guidelines (LS&Gs) have been produced and adopted by the Board for each of the 19 Landscape Types identified within the AONB. The LS&Gs were produced in consultation with local authorities, including Worcestershire County Council, and other partner organisations, including the Forestry Commission and the Countryside Agency, now Natural England and cover a wide range of topics, including woodland creation and management. They have been widely used over the past few years in determining planning and land management issues.

Below is a table that marries up and compares the guidelines for the landscape types from both LCAs.

There are also AONB wide guidelines that are in part 1 of the Cotswolds AONB Guidelines but not necessarily repeated in the tables. These are:

- Permanent pasture is to be retained and woodland creation proposals would not normally be supported. (this includes both unimproved and improved but not short term leys)
- Tree planting on or adjacent to archaeological sites is inappropriate
- New tree planting may not be appropriate on sites of biodiversity or geological interest

The Board's Landscape Strategy and Guidelines contain additional guidelines of relevance and are included in the table. These guidelines are not included in the Board's Guide to Woodland Planting and Management either because they refer to other subjects such as roads or are

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subsequent additions in the LS&G such as orchard restoration. The restoration and recreation of orchards are a feature within the Board's LS&G for Landscape Types covering Bredon Hill and the Severn and Avon Vales but only appear in the Worcestershire guidelines for L15.

### **Comparisons and comments.**

#### **Bredon Hill**

Bredon Hill is one of 13 Cotswold escarpment Outliers and is identified as LCT 1 Escarpment Outlier fringed to the north by LCT 19 Unwooded Vale and to the south by LCT 18 Settled Unwooded Vale by the CCB and as L11 Limestone Estatelands fringed to the north by L2 Principal Unwooded Hills and L3 Wooded hills and Farmlands and to the south by L3 Wooded hills and Farmlands by Worcestershire County Council. The landscape types and boundaries are different, however, the guidelines are broadly compatible. There are however some key exceptions.

Woodland is described as the dominant land cover for L11. This is not the case for Bredon Hill. Those woodlands that do exist are 18<sup>th</sup> and 19<sup>th</sup> Century plantations and not really of ancient character as stated.

The WCC guideline for L3 that there are considerable opportunities for woodland creation has a different emphasis from the CCBs guideline that there are some new opportunities for planting where appropriate. The guideline for L3 may be appropriate for other areas of Worcestershire where the landscape type exists, but not for Bredon Hill. Likewise, the guideline for L2 for large irregular blocks, is not appropriate for Bredon Hill. However, the two sets of guidelines, LCT 1 and L2 agree to the extension of existing woodland, but not in large blocks. The guidelines for L2 should recognise the important scrub community on Bredon Hill as highlighted in E5.

#### **Cotswold Escarpment**

The CCB LCA identifies the Escarpment as LCT 2 and WCC as L2, Principal Unwooded Hills. The L2 guidelines distinguishes the Cotswolds from other areas of Worcestershire where L2 is found. This is important and welcomed by the Board. However, the guideline for large irregular blocks is not appropriate for the Cotswold Escarpment. More recent work on the impacts of climate change and the need for wildlife corridors has identified the Cotswold Escarpment as a vital 80 mile grassland corridor from Bath to Mickleton via the Stroud Valleys. In light of this, the Board will need to make its own guidelines more clear for the escarpment. These revised guidelines are likely to encourage more grassland and the removal of scrub in many areas to establish new climate space for priority species.

#### **High Wold**

LCT 7, High Wold geographically matches L11, Limestone Estatelands. The two sets of guidelines broadly concur. However the L11 guideline for new medium to large scale plantations will not retain the open views and the Board does not want to see roadside tree belts extended. The High Wold is an extensive and important feature of the Cotswolds but only a very small fraction lies within Worcestershire. In this instance we suggest using the Boards guidelines.

#### **The Vale**

An arm of the Cotswolds AONB extends across the Vale to take in Bredon Hill. The CCB LCA classes this as LCT 19 Unwooded Vale and the WCC LCA as L15, Farmlands and Village Farmlands with Orchards and L16, Village Claylands. LCT19 states that woodland creation is not appropriate except some limited tree planting around settlements. L15 concurs. L16 also

supports some planting around settlements but also seeks to encourage small areas of planting and belts along hedgerows, waterways and roads. This latter part conflicts with Board guidance.

### **Ecological Zones**

Two or three Ecological Zones coincide with the Cotswolds AONB. E2, E5 and possibly E14.

#### **E2 Avon Vale Claylands**

Ecological Zone E2 coincides with the AONB along the base of the escarpment at Broadway and a small area within the arm of AONB extending from the escarpment to Bredon Hill. E2 fits with the Board's LCT 19, Unwooded Vale. The ecological guideline suggesting linear planting, does not entirely fit with the CCB tree planting guidelines for LCT 19 or with the WCC guidelines for L15, both of which discourage woodland creation. This can be clarified by reference to where planting takes place around settlements. The conservation of existing woodland and trees is supported. Oak is supported, but it would be useful to clarify whether sessile or pedunculate.

#### **E5 Cotswold Hills**

The ecological guidelines are generally fine but need strengthening to reiterate that woodland creation on permanent pasture would not be supported, neither would the establishment of wood pasture on floristically rich limestone grassland. See comments above regarding the Board's AONB wide guidelines and for the escarpment.

On Bredon Hill, E5 encompasses three Landscape Types, L2, L3 and L11. It is not the case that L2 and L3 are "*underlain by free-draining base-rich limestone rock, in stark contrast to the heavy, poorly draining clays of most of the Avon Vale*". L2 and L3 on Bredon are typically on Lower Lias strata, whereas the Oolitic limestone is generally restricted to L11.

Regarding species selection for Bredon Hill, hawthorn in particular should be of local provenance. Purging buckthorn should be included as a 'suitable species'. Alder is listed as an 'unsuitable species', but it is believed to have existed in the many flushed areas of L2 and L3 at least since the medieval period (and appears in place names). Crab apple is also given as 'unsuitable', though it occurs, probably naturally, in Aldwick Wood (L2) and in several of the L3 hedges.

#### **E14 River Terraces.**

It is difficult to tell from the scale of map whether E14 coincides with the AONB. If it does, it would coincide with the Board's LCT 18, Settled Unwooded vale where woodland creation is not appropriate. Therefore the guidelines give conflicting advice.

### **Section 4, General Principles for semi-natural Habitat**

The LCA for the Cotswolds AONB identifies a range of key characteristics for each of the 19 Landscape Types. A number of the key characteristics occur repeatedly in the 19 landscape types and have been identified as 'Principal Elements' for the whole AONB. One of these is permanent pasture, both unimproved and improved. Consequently the Board has adopted an AONB wide guideline that woodland creation on permanent pasture will not normally be supported. So the Board does not agree that planting 'is appropriate in many cases, for example on improved grassland' as stated on page 105, where this is permanent pasture.

Because there are differences and conflicting guidance between the two sets of guidelines, I recommend that we set up a meeting to resolve this situation.

Yours sincerely,

A handwritten signature in purple ink that reads "Mark Connelly". The signature is written in a cursive style with a large, sweeping 'C' at the end.

Mark Connelly

Land Management Officer