



BY EMAIL: [consultation@southglos.gov.uk](mailto:consultation@southglos.gov.uk)

South Gloucestershire Council  
Street Scene Consultation  
Council Offices  
Castle Street,  
Thornbury  
Bristol  
BS35 1HF

4<sup>th</sup> September 2013.

Dear Sir/Madam,

**Changes to highway and street scene services – consultation.**

The Cotswolds Conservation Board understands and supports the need to review services to reduce costs and ensure efficiency. We are, however, very concerned over the proposal to limit the maintenance of rural grass verges to a twice yearly 1m width cut adjacent to the carriageway as we believe that this would harm the Cotswolds AONB in terms of landscape character, biodiversity and the historic environment.

Appropriate management of highway verges is essential not only for public safety but also for landscape and biodiversity. Some verges may have rare species such as bath asparagus. But all road verges are a form of permanent grassland and a vital wildlife corridor, and in a countryside farmed with increasing intensity need to be managed in a way which recognises the importance of maintaining this habitat throughout the AONB.

Limiting maintenance to the 'highway standard' has been implemented elsewhere in the Cotswolds for some time. Experience show that it has resulted in the development of scrub and trees on roadside verges with consequential:

- Loss of biodiversity, in particular grasslands
- Loss of views
- Negative impact on landscape character and the historic environment
- Damage to adjacent dry stone walls and hedges
- Provision of cover for deer leading to increased deer-vehicle collisions
- Longer time for ice/snow to melt due to shade
- Increased liability to the highway authority of tree inspection and maintenance
- Increase in complaints and claims from bus and HGV companies due to damage caused to vehicles by encroaching scrub and trees.
- Reduced refuge for pedestrians, horse riders and cyclists and for drivers whose vehicles have broken down, particularly on busier routes.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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It is very relevant that on 22<sup>nd</sup> May Sir David Attenborough launched *The State of Nature*, a stock-take by 25 organisations of all our native wildlife. This shows that 60% of the species studied had declined over recent years and more than one in ten of all the species assessed were under threat of disappearing from our shores altogether. The environmental charity Plantlife are currently highlighting through a Road Verge Campaign the specific importance of highway verges for biodiversity and the management issues they raise.  
<http://www.plantlife.org.uk/roadvergecampaign>

There are clear duties on all local authorities under various enactments to take these matters into account in the exercise of their functions. In October 2008 the Cotswolds Conservation Board adopted a position statement on the management of roadside verges. The statement, attached, explains the value of roadside verges, describes current management issues and sets out recommended management based on the need for a sympathetic regime that meets road safety requirements and is cost effective but favours biodiversity and landscape. The new Cotswolds AONB Management Plan 2013 – 18 offers further guidance.

Taking into account the above, the Board asks the Council to review its proposal for rural road verges so as to achieve better compliance with the Cotswolds AONB Management Plan, section 85 of the CROW Act 2000 and section 40 of the NERC Act 2006.

If you have any questions or would like to discuss any of the above responses, please do not hesitate to contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'M. A. Connelly', written in a cursive style.

Mark Connelly  
Land Management Officer