Annex 2 - Local validation of target statements – feedback proforma

Target area (eg. Lincolnshire Wolds):   **Avon Vale NCA 117**

IMPORTANT NOTE: PLEASE PROVIDE SPECIFIC AND DETAILED EVIDENCE AND JUSTIFICATION TO SUPPORT YOUR RESPONSES. THIS WILL NEED TO INCLUDE DETAILED NAMES OF LOCATIONS/ CATCHMENTS, SPECIFIC REFERENCES TO THE ISSUES OR FEATURES, AND ANY REFERENCES TO RELEVANT EVIDENCE PROJECTS (LOCAL OR NATIONAL).

Q1. Are the priority features, opportunities and issues[1] identified for this area present? Does the target information accurately reflect your understanding of the extent of the priority feature or issue? If not why (giving details of where, specific evidence etc.)?   **N.B. The Avon Vale NCA contains an area of the Cotswolds AONB immediately to the west of Malmesbury.**   Within the area of the Cotswolds AONB in the Avon Vale NCA the national data only identifies woodland.   The inclusion of locally derived SHINE data is welcomed, but other local data needs to be included to ensure the final targeting statement properly reflects the assets and opportunities of the NCA, including grasslands.
Q2. The areas marked for natural flood risk management are quite wide ranging as this is the first iteration of this targeting for flood risk. Please can you identify which areas _within_ those mapped are the top specific priorities (e.g. river restoration, catchment wide runoff control, managed realignment) for land use change/ land management to deliver flood risk benefits. Please also identify if any areas are of lesser significance for flood risk.
Q3. Are there any priority features, opportunities or issues missing from the targeting information for this area? (please support any comments with evidence including data sets that may be applicable)   **1**. One of the national data sets identified in the list but not on the map is the AONB. AONBs (and National Parks) are a national landscape designation with the purpose of Conserving and Enhancing Natural Beauty (landscape). Landscape is a priority within protected landscapes and not just an 'overarching theme' as suggested in NELMS literature. Therefore, within NELMS, landscape should be a priority where protected landscapes coincide with NCAs sitting alongside other priority national designations such as SSSIs,

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[1] Please note that some land included for NELMS targeting will be draining to water bodies downstream so not all areas targeted will have a direct failing WFD objective

Scheduled Ancient Monuments and Registered Battlefields. Evidence for this is in legislation including Section 85 of the Countryside and Rights of Way (CROW) Act 2000 which places a duty on relevant authorities to have regard to the purposes of designation 'in exercising or performing any functions in relation to, or so as to affect, land'. Defra's guidance on this duty states that the relevant authorities are expected to be able to demonstrate that they have fulfilled these duties and be able to clearly show how they have considered the purposes of these areas in their decision making.

Even as an 'overarching theme' there is no indication what the landscape objectives of NELMS are.

The % area of AONB within the Avon Vales NCA is scores as nil in the list. The NCA contains parts of 3 AONBs totalling just over 3% of the NCA.

2. AONBs and National Parks have statutory management plans which identify the special qualities of the area and agreed priorities and policies to conserve and enhance them. The management plans are supported by a wide range of data and have been subject to a comprehensive programme of participation and consultation. The plans are also supported by a Strategic Environmental Assessment, Habitats Regulation Assessment and Equalities Assessment. The design and delivery of NELMS needs to take account of the management plan and support its implementation.

3. Field boundaries are a missing priority feature. In particular dry stone walls are a principal characteristic of the Cotswolds and have been invested in by ESA and ES for 20 years. Investing in dry stone walls also supports jobs and tourism and therefore rural growth. Supporting evidence includes the Cotswolds AONB Management Plan, Cotswolds Landscape Character Assessment and Cotswolds AONB Local Distinctiveness and Landscape Change report which also identifies areas of the Cotswolds AONB where dry stone walls and hedges are most prominent. The latter document has been used to target HLS.

4. Whilst woodland creation opportunities appear on the map, there is no priority habitat (excluding woodland) creation opportunity mapping. Ecological network mapping for grassland restoration for the Cotswolds has been undertaken by Natural England and recently refreshed.

Q4. Where are the opportunities in this area for delivering multiple objective agreements? What sort of multiple objectives would this deliver – biodiversity/ water/ historic environment/ landscape/ natural flood management, and how can this be done?

Much of the Cotswolds AONB has the opportunity to deliver high quality multiple objective agreements covering biodiversity, water quality, natural flood management, historic environment and landscape. The Cotswolds is a high quality landscape rich in biodiversity from farmland birds to unimproved grasslands and heritage ranging from individual sites to the wider landscape. It is a major aquifer supplying water mostly beyond the Cotswolds making water quality a priority over much of the area.

Importantly, the Cotswolds offer high potential for retaining and extending ecological

networks building on existing assets such as pasture, ancient woodland and arable, based on its range of height, aspect and sheer size of landscape continuity. Much has been achieved to date using ESA, HLS and EWGS, particularly through the Cotswolds Grassland Project, Cotswolds Ancient Woodland Project, Cotswolds Farmland Bird Project, but the potential to create a genuinely large landscape scale ecological network is huge.

It is vital not to forget the economic importance of the Cotswold landscape. An assessment of the economic value of the Cotswolds AONB in 2013 suggests that around £260 million of GVA and 7,500 jobs are 'critically dependent' on the high quality environment and landscape of the AONB.

An estimated 23 million visits by visitors from the UK and overseas are made annually to this iconic landscape attracted by the combination of special features; grassland, woodlands, archaeological sites, vernacular architecture and dry stone walls etc. Investment in these features supports the rural economy and drives growth.

Q5. Are there any landscape/ catchment scale or other projects underway or planned to deliver changes on the ground in this area that may be relevant to NELMs targeting e.g. NIAs, catchment management projects, woodland partnership projects etc?

Q6. Do you have any other comments to make with regard to the targeting information for this area and how this might be used to help deliver NELMS objectives?

It is essential that an early evaluation scheme is put in place to ensure negative impact on the landscape is avoided.

There is a comparatively small part of the Cotswolds lying within this NCA. There is a high risk that the targeting statement for the NCA will not take proper account of this area of Cotswolds AONB. The solution is to make a reference to use the Cotswolds NCA Targeting statement for part of the Cotswolds within the Avon Vale NCA

The Cotswolds Conservation Board is keen to work with Natural England, Forestry Commission and Environment Agency to develop the targeting of NELMS in the Cotswolds AONB to deliver NELMS objectives in a way that conserves and enhances the natural beauty for which the area is designated. The Board has key evidence in the form of the statutory Cotswolds AONB Management Plan, Landscape Character Assessment, Landscape Strategy and Guidelines and a range of supporting guidance and position statements.

Further points for consideration:

Bearing in mind that there is a process for prioritising the restoration of individual historic buildings and undesignated parklands based on risk, significance and need and their contribution to the wider AE objectives, how might we identify suitable high priority candidates for restoration in this area? (please support any comments with evidence including data sets that may be applicable)

Landscape is an overarching theme for NELMS to be considered in all applications. The landscape priority map layer and data provides a start to help identify and establish where there are greatest opportunities to seek wider landscape outcomes alongside other scheme priorities. Are you able to identify any specific examples of rare surviving landscapes, good representative landscapes, recognised cultural landscapes or very distinctive landscapes/landscape features and are they identified in this area using existing data ? (please support any comments with evidence including data sets that may be applicable)