Annex 2 - Local validation of target statements – feedback proforma

Target area (eg. Lincolnshire Wolds):   **Cotswolds NCA 107**

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.)?

The national data identifying priority features such as SSSIs, SAMs, priority habitats and section 41 species broadly reflect this range of assets in the Cotswolds. It is not entirely clear what habitats are covered by Priority Habitat Creation on the list, but it is assumed to be principally grasslands in the Cotswolds. If so, there are a number of unimproved limestone grassland sites missing.

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

The Board supports the expansion of woodland where appropriate, in order to conserve and enhance their landscape, ecological and cultural value. Of real concern, however, is the woodland creation opportunities mapping, of which there are large areas identified around Stroud and the north east area of the NCA. If implemented this will damage the special qualities of the Cotswolds AONB and part of the rationale behind the areas designation, particularly the large area in the north east of the NCA. This area identified includes High Wold and High Wold Dip-slope, which are characterised by their openness and long views. It would also potentially conflict with farmland bird priority areas and with grassland restoration target areas around the Stroud valleys, Evenlode and Windrush valleys. Some areas identified as woodland creation opportunities overlie SSSIs designated for unimproved grassland such as Painswick Beacon.

The evidence for landscape character and the conflict with the woodland creation opportunity mapping is to be found in the Cotswolds AONB Landscape Character Assessment, Cotswolds AONB Landscape Strategy and Guidelines and the Cotswolds AONB Management Plan. It also conflicts with the Cotswolds NCA profile published in 2013 and other NELMS priority features.

An assurance has been given (NELMS validation event, Chippenham) that all woodland creation proposals will be seen by an adviser, however, if the woodland creation opportunity areas remain on the final targeting statement map, this will encourage landowners to put

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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

forward inappropriate woodland creation proposals leading to conflict with Cotswolds AONB priorities and guidance and with the SEOs in the Cotswolds NCA profile.

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 <u>within</u> 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.

The Flood risk management opportunity areas do not seem to relate to anything. Common sense suggests the focus for this work would be the river systems and not odd blocks scattered across the NCA. Examples of missing areas include the scarp slope streams such as the Isbourne, the Frome valley system above Stroud and the Bybrook just north east of Bath.

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, 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.

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. The Cotswolds NCA Profile also identifies the importance of dry stone walls including in SEO1.

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.

5. World Heritage Sites seem to have no specific targeting. Bath WHS is sited in a hollow of surrounding hills with green vistas in and out of the city revealing its architecture in a landscape setting. These reciprocal views underpin Bath's status as a World Heritage Site. In support of this a Landscape Partnership has established and identified the need for improved land management in the landscape around Bath, in particular managing and restoring wildflower rich grasslands and managing woodlands, to develop and enable viable stewardship of the landscape setting of the WHS, protecting, sustaining and enhancing landscape and biodiversity. The targeting of NELMS around Bath would contribute to achieving these objectives.

6. Within the Cotswolds AONB are two locally designated NIAs identified by the Cotswolds Ecological Network Forum; The Cotswolds Scarp NIA and the Cotswolds Valleys NIA. The NIAs have been identified drawing on the South West Nature Map's Strategic Nature Areas or in Oxfordshire, Conservation Target Areas – the areas with the best habitat restoration potential identified using spatial analysis. Local expertise, wildlife site designations, habitat data and the Cotswolds AONB Landscape Character Assessment were also used. The two NIAs have been endorsed by the Gloucestershire LNP and have local support from Natural England and the Forestry Commission.

The two NIAs form part of the wider Cotswolds Ecological Network which also includes farmland birds, arable plants and key butterfly species such as Duke of Burgundy. The Network is recognised by the Cotswolds Ecological Networks Forum whose objectives include realising opportunities to increase habitat connectivity across the Cotswolds.

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. The principal Cotswold rivers (Windrush, Coln and Churn etc) are tributaries of the Thames and Bristol Avon providing

opportunities for natural flood management, particularly for neighbouring areas beyond the Cotswolds NCA. Although smaller, the scarp rivers, prone to flash flooding, flowing west towards the Severn also provide opportunities for natural flood management for towns such as Winchcombe and in the Frome valley and its tributaries.

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 and designation of the two Cotswolds NIAs, 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?

There are a number of landscape scale projects within the Cotswolds:

Save Our Magnificent Meadows - is the UK's largest partnership project transforming the fortunes of our vanishing wildflower meadows, grasslands and wildlife. Led by Plantlife, the partnership is made up of 11 organisations, including the Cotswolds Conservation Board and is primarily funded by the Heritage Lottery Fund. This is the first time in the HLF's history that it has awarded a grant to a project of this kind.

Nationally Save our Magnificent Meadows is:

- Targeting 74,000 acres of wildflower meadows and grasslands in nine strategic landscapes across the UK, including the Cotswolds.
- Giving people all over the UK the chance to visit, enjoy and learn about our wildflower meadows and grasslands.
- Raising awareness of the desperate plight of our wildflower meadows and grasslands and equipping communities with the knowledge and skills to reverse this devastating trend.

In the Cotswolds the project is to restore 1,125Ha of wildflower rich grasslands within the two Cotswolds NIAs. The primary focus is not the management of the existing high quality grasslands sites, but targeting the low quality and former wildflower rich grasslands that

often surround and connect the existing sites. The support of NELMS is important in the delivery of this landscape scale project.

Bathscapes – as already highlighted above in Q3, Bathscapes is a Landscape Partnership that has identified the need for improved land management in the landscape around Bath, in particular managing and restoring wildflower rich grasslands and managing woodlands, to develop and enable viable stewardship of the landscape setting of the WHS, protecting, sustaining and enhancing landscape and biodiversity. The setting of Bath includes 8 SSSIs, 780Ha of priority habitat and key components of the Bath and Bradford on Avon Bat SAC. 2198Ha of the area is designated as SSSI or SNCI.

B-Lines - Creating a network of B-Lines linking wildflower-rich areas across the West of England, linking the Cotswolds with the Mendips, cities to the countryside, and the coast to the hills. B-Lines are formed by a series of connected 'lines' of meadows and flower rich pastures, which will join up to form a network of flower rich grassland. The B-Lines project includes the southern part of the Cotswold scarp.

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.

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)