

Conor Doherty  
River Basin Programme Manager  
Environment Agency  
Sapphire East  
550 Streetsbrook Road  
Solihull  
West Midlands  
B91 1QT



12th June 2009.

Dear Mr. Doherty,

**A consultation on the Draft River Basin Management Plan Severn River Basin District.**

**Background to comments.**

The Cotswolds Conservation Board was established by Parliamentary Order under part iv of the Countryside and Rights of Way Act 2000. The duties of the Board are :

- To conserve and enhance the natural beauty of the Cotswolds AONB
- To increase the understanding and enjoyment of the special qualities of the AONB, ensuring these are compatible with its conservation and enhancement.

In carrying out its twin duties, the Board shall seek to foster the economic and social well-being of its local communities.

The CROW Act 2000 underlined the importance of AONBs and introduced specific requirements for local authorities and public bodies, including the Environment Agency, in looking after these special areas.

The Cotswolds AONB Management Plan 2008 – 2013, identifies good water quality as one of the Cotswolds special qualities. The Management Plan has the action to: Support appropriate measures to protect water resources and maintain water quality and minimise flood risk as set out in CAMS and River Basin Management Plans and other measures.

However, this action needs to be considered along with the Board's policies on landscape, biodiversity etc.

The Management Plan and other documents such as the Board's Landscape Character Assessment and Landscape Strategy and Guidelines are available on the Board's website: [www.cotswoldsaonb.org.uk](http://www.cotswoldsaonb.org.uk)

## Responses to consultation questions

*Q1 – Do you agree with the assessment of problems in water bodies? What would you change?*

Yes.

*Q2 – Do you agree with the proposed objectives? What would you change?*

*Q3 – For some water bodies we have proposed objectives with deadlines after 2015 or a lower overall target. Do you agree with these changes? What would you change?*

It is disappointing that some rivers in the 3 catchments that come into the Cotswolds AONB are not targeted for good condition until 2027. In some instances this is due to incomplete assessment. Some rivers have no justification given as to why good condition is not targeted until 2027.

The proposed changes in Cross compliance are aimed at having an impact on water quality by having wide margins alongside watercourses. Although the timing of the consultations are out of step, it is important to take this into account.

Section 85 of the Countryside and Rights of Way Act 2000, places a duty on public bodies, including the Environment Agency have regard to the purpose of conserving and enhancing AONBs when carrying out their operations. This ensures the purpose for which the AONB is designated is an essential consideration in reaching decisions or undertaking activities impacting on the Rivers in the Cotswolds AONB are important for landscape, biodiversity and water supply. Consequently, the Board would want to see rivers such as the Isbourne and Tetbury and Sherston Avons to have reached good status by 2015.

*Q4 – To develop this plan we have followed a process to appraise the actions. This process is described in detail in annex E. Do you agree with how we have done this?*

The process seems fine with one exception. Impacts on the landscape do not seem to have been considered. Some of the specific measures and actions will have a positive impact, others have potential negative impacts. It is essential to consider impacts on the landscape, particularly within and adjacent to AONBs. Also, the River Basin Management Plans need to take into account the European Landscape Convention.

*Q5 – What comments do you have on these actions? Are there any actions that have been missed, or any changes you'd propose?*

The actions seem fine – no comments.

*Q6 – What comments on Scenario C actions do you have, including any additional information you can supply about specific actions?*

No comments

*Q7 – What support can you offer, such as undertaking any actions or providing resources, to help deliver more for your environment?*

The Cotswolds Conservation Board has a Landscape Character Assessment and a set of comprehensive Landscape Strategies and Guidelines, some of which relate to the management of rivers, river banks and their surroundings. These guidelines are, for example, relevant to the current River Isbourne catchment land use and flood risk management project

The Board's Conserving and Managing Sub-committee has considered the idea of a position statement/guidance on river corridor management. Nothing is planned for the immediate future, but the statement/guidance could be included in the Board's Business plan for 2010/11 or 2011/12.

The Board would be happy to discuss these ideas further.

*Q8 – Do you agree with our assessment of how climate change will affect pressures on the water environment? What would you change?*

The Board supports the climate change assessment.

If you wish to clarify or discuss further any of the above comments, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink that reads "Mark Connelly". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Mark Connelly  
Land Management Officer