Strategic
Environmental
Assessment
Report for the
2025/30 National
Landscape
Management
Plan

The Cotswolds National Landscape

Craggatak Consulting 20th January 2025





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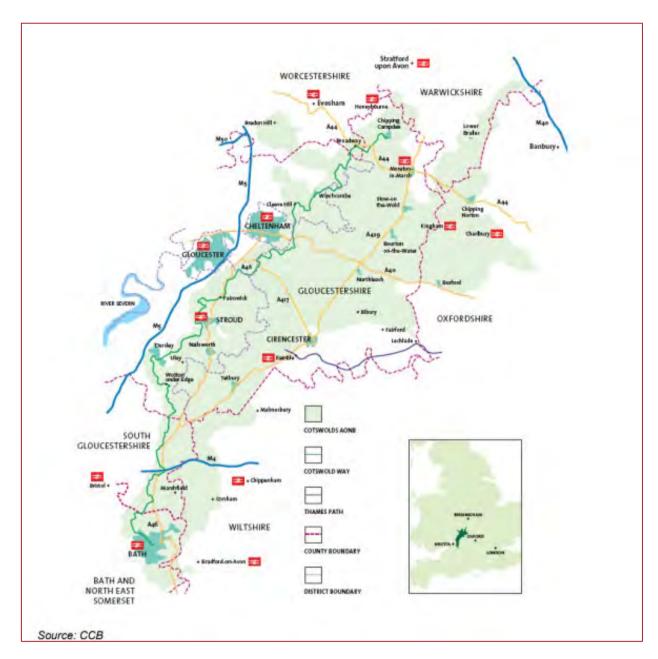


Figure 1: Outline map of the Cotswolds National Landscape

# **Strategic Environmental Assessment Non-Technical Summary**

#### Introduction

Designation of the Cotswolds National Landscape as an Area of Outstanding Natural Beauty (AONB) was in 1966, with an extension in area in 1990. Although AONB is still the legal name of the designation, it was rebranded as a 'National Landscape' for most purposes in June 2020. At 2,038 square kilometres, it is one of the largest protected landscapes in England. The National Landscape stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north. It cuts across 15 local authority areas.

The Cotswolds National Landscape Board has a legal duty to prepare and publish a Management Plan for the area. The plan sets out a framework that gives guidance and direction towards achieving the long-term vision for the National Landscape. The plan has a cascade of three aims and 14 outcomes addressed through 23 policies.

#### Purpose of this Environmental Report and other Assessments

This Environmental Report describes the likely environmental effects of implementing the National Landscape Management Plan. Strategic Environmental Assessment (SEA) helps to identify, describe and evaluate any significant environmental effects arising from implementing the Management Plan, or any reasonable alternatives. It highlights any significant beneficial effects and records any remaining negative effects considering any measures that will make them less harmful.

There is one other assessments of this Plan; a Habitats Regulations Assessment (HRA) that considers the effects on 'European sites' designated for their nature conservation importance. The findings are in a separate report but the HRA screening finds that no policies or objectives in the Management Plan are likely to have any likely significant effect on any important biological or geological site.

#### Scope of the Assessment

There was a Scoping process during July and August 2024 to help ensure the assessment covered the key environmental and sustainability issues relevant to the National Landscape and its setting. The main bodies with environmental responsibilities were engaged in the scoping process. These were Natural England, Historic England and the Environment Agency; and their responses helped to shape the assessment framework.

A review of other plans and programmes helped develop a wider understanding of the issues and priorities relevant to the Site and its setting as well as the wider area. There is wide recognition of the importance of the natural, cultural and built environment of the Cotswolds. The National Landscape Management plan seeks to address three key issues driving change within the Cotswolds:

- The climate emergency mitigating and adapting to climate change whilst conserving and enhancing the natural beauty of the National Landscape.
- Nature's decline and the ecological crisis enabling wildlife to recover, flourish and adapt to climate change through a robust nature recovery network which additionally provides us with clean air and water and healthy soils.
- 3. Health and societal changes ensuring that livelihoods are maintained and that everyone within and around the National Landscape can realise the health and wellbeing benefits of accessing its natural beauty.

#### **Environmental baseline information**

Baseline environmental information establishes the context of the Management Plan and predicts how the conditions would progress in the absence of that plan. The assessment uses nine Environmental Objectives to

represent the local environmental issues. They test whether the Management Plan policies (or their absence) create adverse effects on the special qualities of the National Landscape.

#### Summary of the appraisal

The proposed policies are well-matched. There are no tensions or sensitivities arising from where two or more policies interact. The proposed policy cascade has a beneficial, and in parts a significantly beneficial, effect on the SEA Environmental Objectives. There are no adverse effects on the SEA Environmental Objectives so there is no need to consider measures to increase the beneficial effects but opportunities exist to do so. There is no recommendation for mitigating actions.

The findings are that the proposed policies consistently give greater environmental benefits than the 'do-nothing' situation. In most cases, the benefits are only marginally better than the 'do-nothing' scenario. The plan deals with the key issues of climate change and nature recovery.

The Climate Emergency - There are many organisations that have the opportunity, authority and resources to take meaningful actions. However, the proposed polices offer some advantages over the do-nothing option as they support an area-wide approach. Others will also take this initiative but without coordination, opportunities may be lost. The management plan offers a more certain approach.

Nature's decline and the Ecological Crisis - There are many organisations that have the opportunity, authority and resources to take meaningful actions. Some of the proposed polices offer limited advantages over the donothing option, generally as they support an area-wide approach. Others will also act but without coordination, opportunities may be lost. Several management plan policies support the actions of others rather than adding extra initiatives. Actions, like volunteering and green prescribing, will only happen with active support from the management plan. The management plan offers a more certain approach.

Health and well-being - There are many organisations that have the opportunity, authority and resources to take meaningful actions. The management plan does not spell out the health and well-being benefits in each of its sections when others do. However, overall, the proposed polices offer some advantages over the donothing option as they support an area-wide approach. Others will act but without coordination, opportunities may be lost. There may be a more proactive approach with the plan in place.

#### **Monitoring**

The SEA Regulations require monitoring measures for all the significant effects, both positive and negative, identified in the assessment. The SEA of the draft management plan has identified no significant negative effects that are likely to arise from the implementation of management plan. Some significant positive effects are likely to arise from the implementation of the plan. The overall assessment of the current baseline data is that it is good. The current indicators will deliver an effective monitoring framework once all data is sourced and secured.

#### Consultation

The SEA Scoping Report went out for consultation during November 2024 to which only Historic England responded.

The Environment Agency agreed that the SEA Scoping Report is sufficiently robust but recommended the updating and inclusion of three plans for reference. Historic England confirmed that, given the 'light touch' review of the interim Management Plan, the proposed methodology provides an appropriate consideration of the historic environment. Natural England suggested additional wording to describe one of the environmental objectives and asked for the monitoring indicators to better reflect the effects of the plan itself rather than wider changes. All these points were accepted.

#### Cotswolds National Landscape Management Plan SEA Environmental Report (FINAL)

The SEA Environmental Report went out for consultation in February 2023 to which English Heritage and Natural England responded. Historic England reports that the SEA Environmental Report is a 'clear and well-presented report and assessment of the potential implications.'

#### Conclusion

There is nothing in the management plan that will undermine the special qualities of the AONB. Implementation of the proposed Interim Management Plan will have environmental and sustainability benefits for the Cotswolds National Landscape.

A full version of this version of the SEA Environmental Report is available from the Cotswolds National Landscape Board.

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# 1. Background

- 1.1. This Environmental Report has been prepared as part of the Strategic Environmental Assessment (SEA) of the Cotswolds National Landscape (CNL) Management Plan Review. A National Landscape is the everyday name for what is set out in legislation as an Area of Outstanding Natural Beauty (AONB). The statutory consultation bodies (Natural England, Historic England and the Environment Agency) must agree the scope and level of detail to be contained in the Environmental Report. The SEA Scoping Report went out for consultation during July and August 2024.
- 1.2. Both Natural England and the Environment Agency chose not to comment on the draft Scoping Report. They have confidence that the approach is in accordance with the regulations.
- 1.3. Historic England was supportive of the approach but asked for the relationship of the historic environment to the climate emergency in Table 2 (Environmental Issues) to be expanded, and that similar links be made in Table 3 (Sustainability Framework). This has been done. It also suggested a simpler way of referencing the heritage opportunities in Table 3, which we have adopted.

# **Strategic Environmental Assessment**

- 1.4. Strategic Environmental Assessment is a statutory requirement<sup>1</sup> to ensure that land-use plans and programmes that are likely to have significant effects on the environment are the subject of a strategic assessment of options and alternative courses of action during plan preparation to avoid or mitigate any adverse effects. The approach for carrying out the SEA of the Management Plan Review is based on current best practice and the following guidance:
  - HMSO (September 2005) A Practical Guide to the SEA Directive, Office of the Deputy Prime Minister, Scottish Executive, Welsh Assembly Government, Department of the Environment for Northern Ireland.
  - Dodd et al (2007) The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it, RSPB.
  - Natural Scotland (September 2006) Strategic Environmental Assessment Toolkit. Scottish Executive.
  - Countryside Council for Wales (2008) The Areas of Outstanding Natural Beauty in Wales -Guidance on the Review of Management Plans
  - Richard Partington et al (January 2008) Guidance to English AONB Partnerships and Boards on Strategic Environmental Assessment (SEA) of AONB Management Plans, Natural England

<sup>&</sup>lt;sup>1</sup> Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment". Transposed into law by Statutory Instrument 2004 No. 1633 The Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations"), <a href="http://www.opsi.gov.uk/SI/si2004/sch1">http://www.opsi.gov.uk/SI/si2004/sch1</a>

- Historic England (2016): Sustainability Appraisal and Strategic Environmental Assessment –
   Advice Note 8
- 1.5. To integrate fully the SEA process with the production of the Management Plan there is close collaboration with the review team. There are five stages to a Strategic Environmental Assessment:
  - Stage A: Scoping and consultation with Environmental Bodies
  - Stage B: Assessment of plan content and analysis of alternatives
  - Stage C: Preparation of an Environmental Report
  - Stage D: Consultation and consideration of the SEA findings by the decision maker; and
  - Stage E: Monitoring the performance of the plan against the SEA findings.
- 1.6. This report supports Stages B and C. The SEA Scoping Report consultation responses have been considered and used to inform relevant sections of the SEA Environmental Report (this document).

# **Purpose of the Environmental Report**

- 1.7. This Environmental Report sets out the findings of the Strategic Environmental Assessment for the National Landscape Management Plan review. Its primary purpose is to identify, describe and evaluate any significant environmental effects arising from implementing the management plan, or any reasonable alternatives. Any significant beneficial effects are highlighted, as well as recording any residual negative effects once mitigating measures are taken into account.
- 1.8. This assessment follows the requirements of the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004 . The methodology used follows the guidance set out in paragraph 1.4.

# **Cotswolds National Landscape**

- 1.9. The Cotswolds National Landscape was designated as an Area of Outstanding Natural Beauty (AONB) in 1966, and extended in area in 1990. Although AONB is still the legal name of the designation, it was rebranded as a 'National Landscape' for most purposes in June 2020. At 2038 square kilometres, it is the largest AONB and the third largest protected landscape, including National Parks in England. The National Landscape stretches from Bath and Wiltshire in the south, through Gloucestershire and Oxfordshire to Warwickshire and Worcestershire in the north (Figure 1). It cuts across 15 local authority areas.
- 1.10. AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. Each AONB has been designated by reason of its 'special qualities'. These include the flora, fauna, historical and cultural associations as well as landscape and scenic views. The designation has international significance as 'AONB' is recognised as a category 5 IUCN Protected

Landscape designation – Lived in landscapes that represent an integral balance between people and nature.

## **Management Plan review**

- 1.11. Section 82 of the Countryside and Rights of Way (CRoW) Act 2000 establishes the primary purpose of AONB designation as the conservation and enhancement of natural beauty. Section 85 of the CRoW Act (as amended by section 245 of the Levelling-up and Regeneration Act 2023) places a duty on all public bodies (other than a devolved Welsh authority) to 'seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty'. Under section 89, the relevant local authorities must prepare and publish a Management Plan for each AONB; and keep it under review. A plan under section 89 relating to an AONB in England must further the purpose of conserving and enhancing the natural beauty of that area.
- 1.12. The Management Plan is a statutory document. It provides a policy framework that brings together partners to help them design, resource and implement the priorities set out specifically for the AONB designation. It guides and informs all other plans and activities that may affect the AONB so that they can contribute to the continued conservation and enhancement of the AONB designation.
- 1.13. For this AONB, there is one relevant authority, the Cotswolds National Landscape Board. Established as the Cotswolds Conservation Board by Parliament in 2004, it has two statutory purposes:
  - To conserve and enhance the natural beauty of the Cotswolds National Landscape.
  - To increase the understanding and enjoyment of the special qualities of the Cotswolds National Landscape.

In fulfilling these roles, the Board has a duty to seek to foster the economic and social well-being of people living in the National Landscape. In circumstances where these purposes and duties are irreconcilable, the Board must give priority to conserving and enhancing the natural beauty of the National Landscape .

- 1.14. The Board consists of 37 members, of whom local authorities nominate 15, the parish councils nominate eight, and government appoint 14. The Board's work programme is delivered by a small team of staff, supported by volunteers including the Cotswold Voluntary Wardens who deliver a programme of practical projects and guided walks across the National Landscape
- 1.15. The current Management Plan is for the 2023-25 period. CRoW requires a formal review of each Management Plan at intervals of not more than five years. The Board is now preparing a Management Plan for the period 2025-30. Following consultation with local communities, public bodies and agencies with an interest in the area, the plan will present the special qualities and features of the National Landscape, and set out the outcomes and policies needed to ensure their conservation and enhancement.
- 1.16. The outcomes and policies are arranged under three over-arching headings which reflect the National Landscape's purpose of designation (to conserve and enhance natural

beauty) and the National Landscape Board's additional purpose (to increase understanding and enjoyment). These headings are illustrated further with three broad aims:

- 1. Cross cutting themes: Tackling 21st century issues through progressive partnerships seeking 2 outcomes through 4 policies;
- 2. Conserving and enhancing: Influencing and delivering for landscape, nature and climate seeking 9 outcomes through 16 policies;
- 3. Increasing understanding and enjoyment: Ensuring access, learning and wellbeing opportunities are for everyone seeking 3 outcomes through 3 policies.

The policy framework is set out in Appendix 1.

# Relationships with other assessments

## Habitat Regulation Assessment

- 1.17. The EU Natura 2000 network provides ecological infrastructure for the protection of sites that are of exceptional importance in respect of rare, endangered or vulnerable natural habitats and species within the European Community. These sites, known as European sites, consist of Special Areas of Conservation (SAC), Special Protection Areas (SPA) and Offshore Marine Sites. It is common practice to treat RAMSAR sites (Internationally Important Wetlands) as if they were European sites. The guidance recommends taking into consideration European sites within the plan area and within 15km of its boundary. The relevant sites are:
  - Avon Gorge Woodlands SAC
  - Bath and Bradford on Avon Bats SAC
  - Bredon Hill SAC
  - Chew Valley Lake SPA
  - Cothill Fen SAC
  - Cotswold Beechwoods SAC
  - Dixton Wood SAC
  - Lyppard Grange Ponds SAC
  - Mells Valley SAC
  - Mendip Woodlands SAC
  - North Meadow and Clattinger Farm SAC
  - Oxford Meadows SAC
  - River Avon SAC
  - Rodborough Common SAC
  - Seven Estuary RAMSAR
  - Seven Estuary SPA
  - Walmore Common RAMSAR
  - Walmore Common SPA
- 1.18. The environmental assessment findings are, in part, based on findings from a Habitats Regulations Assessment (HRA) Screening of the Management Plan Consultation Draft.

- The HRA reports separately but its findings are relevant for the SEA Objective E3 (Protect and enhance biodiversity habitats and species).
- 1.19. The screening of the Management Plan found that no policy areas would have a 'Likely Significant Effect' on the UK national site network of European conservation sites.

# Natural capital and an ecosystem approach

- 1.20. Natural capital is another term for the stock of renewable and non-renewable natural resources on earth (e.g., plants, animals, air, water, soils, minerals) that combine to yield a flow of benefits or "services" to people<sup>2</sup>. These flows can be ecosystem services or abiotic services, many of which we depend on. Ecosystem services are the benefits to society from nature; abiotic services are benefits to people that do not depend on living processes. They arise from fundamental geological processes.
- 1.21. An ecosystem approach makes explicit the link between the status of natural resource systems and ecosystem services that support human well-being. It seeks to maintain the integrity and functioning of ecosystems to avoid rapid undesirable ecological change. It also recognises that the impacts of human activities are a matter of social choice, and are as integral to ecosystem interactions as ecosystems are to human activities.

#### Definition of an Ecosystem Approach

"a strategy for the integrated management of land, water and living resources that promotes conservation and sustainable use in an equitable way"

Convention on Biological Diversity definition<sup>3</sup>

- 1.22. This approach provides a way to manage nature that combines three core themes<sup>4</sup>
  - the ecology of the natural environment, including its functions and processes;
  - the benefits that people get from the natural environment (ecosystem services); and
  - the value of nature to society (in both monetary and non-monetary terms).
- 1.23. The availability of expertise and data limits the application of the ecosystem approach to the management of protected areas. Ecosystem services provided in the Cotswolds are likely to include:

<sup>&</sup>lt;sup>2</sup> Adapted from the Natural Capital Protocol, 2016

<sup>&</sup>lt;sup>3</sup> Secretariat of the Convention on Biological Diversity (2004) The Ecosystem Approach, (CBD Guidelines) Montreal: Secretariat of the Convention on Biological Diversity 50 p.

<sup>&</sup>lt;sup>4</sup> Hunt, D. Crosher, I., Wharton, A. & Hayes, G. (2012). Embedding the Ecosystem Approach into existing landscape scale or area based partnership delivery: Internal guidance for Natural England staff. Natural England, November 2012

<sup>5 |</sup> Page CRAGGATAK Consulting www.craggatak.co.uk

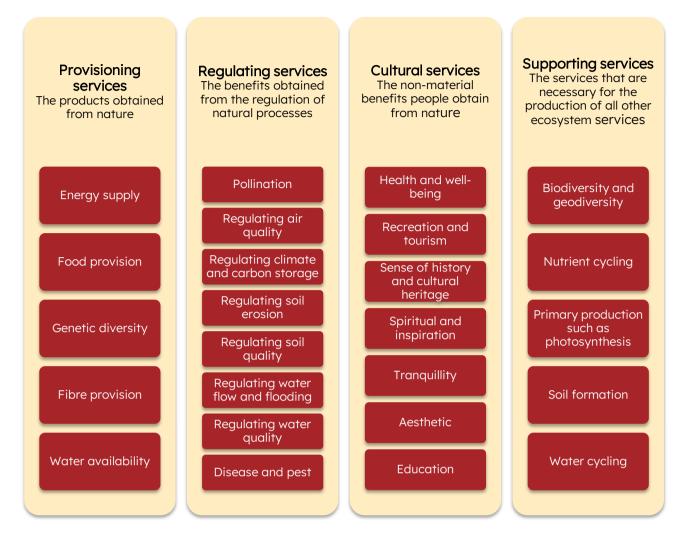


Figure 2: Suggested ecosystem services delivered in the Cotswolds National Landscape

- 1.24. The data is not readily available to enable a full valuation of these services. However, even an initial assessment of ecosystem services affected by a policy choice can indicate how potentially significant impacts could be and where uncertainties and evidence gaps lie. Key indicators help monitor the condition of the ecosystem services. The effects of proposed or alternative actions on their status are considered.
- 1.25. This SEA supports an ecosystem approach. It will consider the possible indirect, direct and cumulative effects of projects implemented under this plan. It is not an ecosystem service valuation.

#### Relationship to other policies, plans and programmes

- 1.26. A key element in the SEA process is to review relevant international, national, regional and local policy guidance, plans and strategies, to:
  - Ensure the Management Plan proposals and the SEA are consistent with and comply with the requirements of relevant plans and policies, especially where they refer to environmental priorities;

- Identify environmental objectives, key targets and indicators that should be reflected in the SEA;
- Provide evidence for the SEA rationale.

#### 1.27. The selection criteria were:

- International documents having the status of a plan, policy or programme
- National documents having the status of a national strategy or a White Paper outlining intended policy
- Regional and local documents having the status of strategy or policy
- Other documents not having a statutory status but policy documents published by the statutory bodies

Appendix 2 list the documents under review. This review informs the SEA.

# Legislation, conventions and national advice

- 1.28. Area of Outstanding Natural Beauty is a statutory landscape designation. The National Parks and Access to the Countryside Act 1949, as modified by the Countryside and Rights of Way Act 2000, provides the primary legislation for the designation of Areas of Outstanding Natural Beauty. From the Acts, a particular set of objectives is developed for AONBs<sup>5</sup>:
  - The primary purpose of designation is to conserve and enhance natural beauty.
  - In pursuing the primary purpose of designation, account should be taken of the
    needs of agriculture, forestry, other rural industries and of the economic and social
    needs of local communities. Particular regard should be paid to promoting
    sustainable forms of social and economic development that in themselves
    conserve and enhance the environment.
  - Recreation is not an objective of designation, but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.
- 1.29. Ratification of the European Landscape Convention by the UK was in November 2006; and became binding on the 1 March 2007. The Convention aims to ensure the proper protection, management and planning of landscapes across Europe and aims to bring all countries up to the standard of the best.
- 1.30. Following the passing of the European Union (Notification of Withdrawal) Act 2017, the UK left the European Union on the 31<sup>st</sup> January 2020 (there followed a 12-month transition period. The new Management Plan takes account of the changed relationship between the UK and the EU. The natural environment of the Cotswold has benefited from some support from EU budgets, particularly for research and academic cooperation. That support is very likely to stop unless the UK government gives a clear undertaking to

<sup>&</sup>lt;sup>5</sup> Countryside Agency (2006), Guidance for the review of AONB Management Plans, CA221, Cheltenham, August 2006

<sup>7 |</sup> Page CRAGGATAK Consulting www.craggatak.co.uk

match any existing funding. There could be a period of inertia whilst building new resources and structures.

- 1.31. In 2018, Defra launched its 25-year plan for the environment<sup>6</sup> that set out the vision for a quarter-of-a century of action to help the natural world regain and retain good health. Defra undertook to refresh the plan every 5 years. The Environmental Improvement Plan (EIP), published in January 2023 is the first five-year refresh of the government's 25-Year Environment Plan<sup>7</sup>. It is one of the core drivers of a Management Plan. Some of the goals and targets established in the EIP are reflected in a new Protected Landscapes Targets and Outcomes Framework. The framework includes 10 target indicators for the NL.
- 1.32. A general election took place on Thursday 4 July 2024. The new secretary of state for the environment, food and rural affairs unveiled 5 core priorities for Defra:
  - to clean up rivers, lakes and seas;
  - create a roadmap to move Britain to a zero-waste economy;
  - to boost food security;
  - to ensure nature's recovery and
  - protect communities from the dangers of flooding.
- 1.33. The National Planning Policy Framework (2023) sets out the Government's planning policies for England and how to apply them. Paragraph 182 says that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. It goes on to state that the conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas.
- 1.34. The Levelling Up and Regeneration Act (LURA) 2023 includes measures that relate explicitly to National Landscapes. Enhancement of the protected landscapes is enacted through Section 245 (Protected Landscapes) of the LURA.<sup>8</sup> In this context, the phrase 'protected landscapes' refers to national parks, the Broads and national landscapes.<sup>9</sup> Section 245 came into force on 26 December 2023.
- 1.35. Section 245 sets a statutory duty on relevant authorities<sup>10</sup> (in exercising or performing any functions in relation to, or so as to affect, land in protected landscapes in England) to seek to further the purpose designation of the area.<sup>11</sup> LURA changes the statutory duty of

<sup>&</sup>lt;sup>6</sup> Defra (2018) A Green Future: Our 25 Year Plan to Improve the Environment, HMSO

<sup>&</sup>lt;sup>7</sup> Defra (2023) Environmental Improvement Plan 2023, first revision of the 25 Year Environment Plan, HMSO

<sup>&</sup>lt;sup>8</sup> Section 245 of the Levelling-Up and Regeneration Act 2023 (link)

<sup>&</sup>lt;sup>9</sup> The LURA refers to Areas of Outstanding Natural Beauty (AONB) rather than National Landscapes, as AONB is still the legal designation.

<sup>&</sup>lt;sup>10</sup> A list of 'relevant authorities' is provided in Defra's guidance on the 'duty of regard' (link). The relevant authorities include: government departments and their executive agencies and related public bodies; regulators; statutory undertakers; local authorities and parish councils; the Crown Estate; and Conservation Boards.

 $<sup>^{11}</sup>$  With regards to national landscapes, the purpose of designation is to conserve and enhance the natural beauty of the area.

<sup>8 |</sup> Page CRAGGATAK Consulting www.craggatak.co.uk

the Board from 'have regard to' to 'seek to further' the purposes of designation. The Secretary of State may make provision about how a relevant authority is to comply with this duty, including provision about things that the authority may, must or must not do to comply with the duty; and require a relevant authority to contribute to the preparation, implementation or review of a protected landscape management plan.

#### Local Authorities

1.36. Local authorities must seek to further the purposes of national landscape designation (S 245: LURA 2023). The NL

County Council	Unitary Council	District or	Borough Council
Gloucestershire	Bath and North East Somerset	Cheltenham	Stratford-on-Avor
Oxfordshire	South Gloucestershire	Cherwell	Tewkesbury
Warwickshire	Wiltshire	Cotswold	West Oxfordshire
Worcestershire		Stroud	Wychavon

lies within the bounds of 15 local authorities. These are of three types, Unitary Authorities, County Councils and District (or Borough) Councils. The County Councils have many responsibilities but two have a direct effect on the Cotswolds. As the minerals and waste authorities, they produce minerals and waste local plans. They also deal with local transport, highways and tourism. The District Councils are required to produce development plans to guide spatial change and growth within their areas. These plans set out the vision and framework for future development in their area. They address needs and opportunities in relation to the economy, housing, community facilities and infrastructure; as well as provide a basis for safeguarding the environment (including the National Landscape), adapting to climate change and securing good design. The Unitary Councils have both the County and the District responsibilities.

# **Government Agencies**

- 1.37. Government agencies must seek to further the purposes of national landscape designation (S 245: LURA 2023). There is a range of Government Agencies whose actions impact upon the Cotswolds. Their strategies set high-level policy and generally cover the whole of the country. Any mention of a particular site, such as the Cotswolds, within these policies indicates the high national importance of the topic.
- 1.38. Natural England's purpose is to help conserve, enhance and manage the natural environment for the benefit of present and future generations, thereby contributing to sustainable development. It seeks a well-managed Nature Recovery Network across England which connects people to the natural environment for their own and society's wellbeing, enjoyment and prosperity. It is directly responsible for the management of the national sites and prepares plans to ensure that these sites reach a favourable ecological condition. The Targets and Outcomes Framework establishes a core, shared set of indicators for Protected Landscapes. Natural England will supply data to Protected Landscapes on these indicators, undertaking a significant part of the data gathering and processing effort for Protected Landscapes. The Targets and Outcomes Framework replaces the Monitoring Environmental Outcomes in Protected Landscapes data, supplied by Natural England since 2012.

- 1.39. Historic England is the public body that helps people care for, enjoy and celebrate England's spectacular historic environment. It does this by:
  - championing historic places;
  - identifying and protecting our heritage;
  - supporting change;
  - understanding historic places; and
  - providing expertise at a local level.
- 1.40. It is the Environment Agency's duty to protect and improve the environment. In England it regulates major industry and waste, and the treatment of contaminated land. It is responsible for water quality, resources and fisheries; inland river, estuary and harbour navigations; and conservation and ecology. It is also responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.

# 2. Environmental and sustainability baseline information

# Key local environmental trends

- 2.1. The SEA Directive requires detailed baseline information to be gathered as part of the assessment process. Information must be gathered on "relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan" and the "environmental characteristics of the areas likely to be significantly affected" (Annex I (b) & (c)).
- 2.2. The baseline data is also required to highlight "any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Birds Directive) and 92/43/EEC (Habitats Directive)" (Annex I (c)).
- 2.3. The assessment of impacts of a plan must be based on the current state of the environment, the 'baseline'. The source of baseline information will be in line with the Schedule 2 of the SEA Regulations. We use PLTOF (protected landscapes targets and outcomes framework) Reports, State of the NL Report, Natural England's National Character Area Profiles (mainly 107 but including 95, 96, 106 117 and 118) and the evidence-base attached to the preparation of the local authority Local Development Plans. The baseline is, therefore, informed by factual data and professional judgement based on survey. The data is set out in Appendix 7.
- 2.4. The Board identifies three key issues driving change within the Cotswolds National Landscape:
  - The Climate Emergency Climate change is happening, and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and Special Qualities of the Cotswolds National Landscape.

- Nature's decline and the Ecological Crisis Wildlife loss is well documented and understood. Climate change is threatening the loss of already diminished wildlife at an even greater scale and pace. There is a need to create a robust and resilient nature recovery network - a landscape rich in joined up and well managed habitats. The need for action is urgent to avoid a mass extinction event.
- Health and well-being Connections within the National Landscape and with its
  setting are important. The mental and physical health benefits of accessing
  natural beauty are becoming increasingly understood and appreciated. The
  COVID-19 pandemic has had a significant impact on human behaviour. For
  example, people have travelled less and many have worked from home. People are
  more aware of the importance of green and blue spaces.
- 2.5. The key issues associated with the environmental trends within the National Landscape and the likely outcomes if no action is taken are shown in **Appendix 3**.

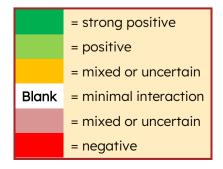
# **Environmental appraisal framework**

- 2.6. The Natural England Guidance sets out a generic list of SEA Objectives. For the SEA Assessment, we use 9 SEA Environmental Objectives. These ensure that the Objectives and accompanying issues and criteria are appropriate for this SEA. Appendix 4 presents the SEA Environmental Objectives, complete with key sustainability issues arising from the scoping exercise. The key issues will help ensure that the SEA is as locally specific as possible
- 27. We also set out indicators that link the SEA Objectives to data and provide the basis for monitoring. In the consultation Scoping Report, we identify 27 Headline Indicators that can monitor the application of the management plan's policies. Monitoring also occurs through other programmes and we show additional indicators for which data may be available.

## 3. Environmental assessment

## Methodology

- 3.1. Step 1 is to consider the Management Plan draft text and test the compatibility of its policies and objectives. The intent is to identify potential tensions or sensitivities where two or more interventions interact. We collect the findings in a Compatibility Matrix and summarise them in a chart.
- **3.2.** Using professional judgement, each relationship is plotted as:



A commentary develops the findings to take account of the varying environmental sensitivities of the different topic areas. The consideration of the compatibility of the vision for the NL and the defined attributes of the site is a part of this stage. We will express this as a **Policy Cascade** supported by the commentary.

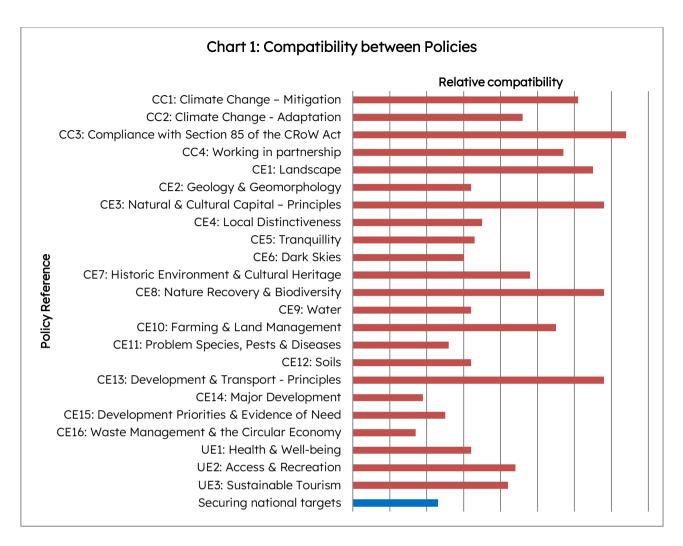
- 3.3. Step 2 will check each objective against the full range of SEA Objectives, as identified in the SEA Scoping Report. The intent is to measure the significance of the effect in terms of:
  - Beneficial or adverse effects;
  - Magnitude of the effects;
  - Direct and indirect effects;
  - Cumulative effects; and
  - Reversible or irreversible effects.
- 3.4. The findings will emerge in a Consistency Matrix for each objective area and summary tables and charts present the combined effects of the objectives and their policies. A plot of each relationship will use the same discipline as for the Compatibility Matrix.
- 3.5. Step 3 will consider Alternative Solutions to the issues identified during the Management Planning process. As there is no alternative solution published, we will make a 'donothing' comparison. The purpose is to show that the chosen pathway is the most-sound in terms of the environment and wider sustainability. This analysis tests the proposed actions and the 'do-nothing' scenario against the trends identified in the SEA Scoping Report (as shown in Appendix 3).
- 3.6. Finally, we draw and present our Conclusions.

# Compatibility between Management Plan policies

- 3.7. The first task was to check each policy of the Management Plan against each other in Compatibility Matrix to see whether there were any potential tensions or sensitivities arising where two or more interact. The full policy cascade is set out in Appendix 1.
- 5.8. The findings are set out in Table 1. The policies run both horizontally and vertically, so each interaction appears twice (appearing either side of the diagonal grey band). The grey squares are where each separate policy meet and is not a part of the assessment. Squares close to the grey band represent policies that lie together in the plan. Most of the positive interactions (green squares) lie along this line. However, there are clusters of green running along the top and left-hand edge of the table. This suggests that the 'cross-cutting' policies have quite strong interactions with the other polices. The interactions between the 'conserve & enhance' and 'understanding & enjoyment policies are weaker. There are many minimal interactions (white squares). They are associated with the more focused 'development' policies. This is not surprising as the policies are quite specific in their intent. There is very little duplication of actions. There is a scattering of positive uncertain relationships (yellow squares) but no negative uncertain impacts.

Policy ref		2	CC2	CC3	20	CE1	CE2	CE3	CE4	CE5	CE6	CE7	CE8	CE9	<b>CE10</b>	E11	<b>CE12</b>	<b>CE13</b>	E14	<b>CE15</b>	<b>CE16</b>	UE1	NE2	NE3	F
Climate Change – Mitigation	CC1						_	_							0	•	)	U					$\overline{}$	_	•
Climate Change - Adaptation	CC2																								
Section 85 compliance	CC3																								
Working in partnership	CC4																								ĺ
Landscape	CE1																								
Geology & Geomorphology	CE2																			T					ĺ
Natural & Cultural Capital – Principles	CE3																								ĺ
Local Distinctiveness	CE4																				T		T	$\exists$	ĺ
Tranquillity	CE5																						T	$\exists$	ĺ
Dark Skies	CE6																			$\exists$			T	$\exists$	ĺ
Historic Environment & Cultural Heritage	CE7																			П					
Nature Recovery & Biodiversity	CE8																								
Water	CE9																						П		
Farming & Land Management	CE10																								ĺ
Problem Species, Pests & Diseases	CE11																						T		
Soils	CE12																						T		ĺ
Development & Transport - Principles	CE13																								ĺ
Major Development	CE14																						T		ĺ
Development Priorities & Evidence of Need	CE15																								ĺ
Vaste Management & the Circular Economy	CE16																			T					ĺ
Health &Well-being	UE1																								ĺ
Access & Recreation	UE2																								
Sustainable Tourism	UE3																								
Securing national targets	PLTOF																		$\dashv$	$\dashv$	$\neg$			$\rightarrow$	ĺ

- **3.9.** It is important to consider the strong positive relationships. These are what will focus the plan. This is clearer in **Chart 1**; a chart showing the indicative strengths of each outcome.
- 5.10. The policies with the strongest positive relationships with other policies are CC3: Compliance with Section 85 of the CRoW Act, CE3: Natural & Cultural Capital Principles, CE8: Nature Recovery & Biodiversity, and CE13: Development & Transport Principles. These ar closely followed by CE1: Landscape and CC1: Climate Change Mitigation. Defra call for national landscape management plans to give priority to nature recovery and the Cotswolds NL management plan clearly does this. As the national landscape is a landscape designation, it is no surprise that the landscape policy links to so many other policy areas. The strength of the development policy is very welcome; it reflects the call for development decisions to be made with a full understanding of the implications for the national landscape. It is also worth noting that the requirement to achieve targets set by Defra links to six policies (the blue bar). There are strong interactions with CC2: Climate Change Adaptation, CE7: Historic Environment & Cultural Heritage, and CE8: Nature Recovery & Biodiversity; and there are good interactions with CC3: Compliance with Section 85 of the CRoW Act and CC4: Working in partnership.



3.11. The policies with the weakest relationships with other policies are CE14: Major Development, CE15: Development Priorities & Evidence of Need, and CE16: Waste Management & the Circular Economy. These are narrowly framed policies that affect very specific areas of work; wider relationships would not be expected.

## **Findings**

3.12. The findings are that though there are no negative effects. As there is compatibility between all the policies, there is no need to consider measures to reduce any tensions or sensitivities.

# **Consistency with SEA Objectives**

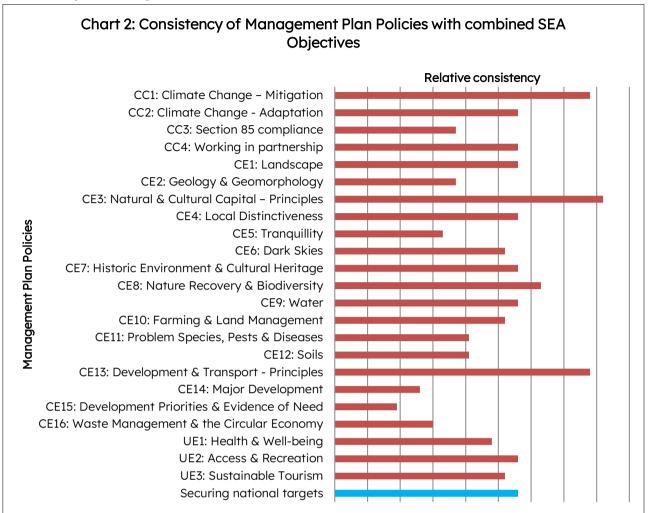
- 3.13. The next task is to check the proposed intentions of the Management Plan against the SEA Environmental Objectives in a Consistency Matrix. This was to see whether there were any significant beneficial or adverse effects; and to gauge the magnitude of that effect. Where appropriate, there is consideration as to whether the effect is reversible.
- 3.14. A brief commentary on this analysis is set out in Appendix 5 where we test the Management Plan Policies against the SEA Objectives. Table 2 summarises this analysis and shows that there are no negative interactions between the SEA Objectives and Management Plan

Table 2: Consistency between SEA Objectives & Mana	iger	me	nt	Plo	n	Ро	lici	es						
	SEA Objectives													
Management Plan Policies	E1 Climate change	E2 Soils, air & water	E3 Biodiversity, habitats & species	E4 Landscape	E5 Cultural heritage	E6 Local distinctiveness	E7 Human health	E8 Local economy	E9 Cumulative impacts					
CC1: Climate Change – Mitigation														
CC2: Climate Change - Adaptation														
CC3: Section 85 compliance														
CC4: Working in partnership														
CE1: Landscape														
CE2: Geology & Geomorphology														
CE3: Natural & Cultural Capital – Principles														
CE4: Local Distinctiveness														
CE5: Tranquillity														
CE6: Dark Skies														
CE7: Historic Environment & Cultural Heritage	П													
CE8: Nature Recovery & Biodiversity														
CE9: Water														
CE10: Farming & Land Management														
CE11: Problem Species, Pests & Diseases	Г													
CE12: Soils														
CE13: Development & Transport - Principles														
CE14: Major Development														
CE15: Development Priorities & Evidence of Need														
CE16: Waste Management & the Circular Economy														
UE1: Health & Well-being														
UE2: Access & Recreation														
UE3: Sustainable Tourism														
Securing national targets														

policies. There are several minimal interactions (white squares), especially within the 'development' sections of plan. The 'cross-cutting' section of the plan shows the greatest consistency with the SEA Objectives; there are few white squares in this part of the table.

3.15. It is useful to consider the material in Table 2 in two ways. Firstly, to study the interactions of each plan policy against the combination of the SEA Objectives (Chart 2); and then of the combination of the policies against each SEA Objective (Chart 3).

# Consistency of Management Plan Policies with combined SEA Objectives

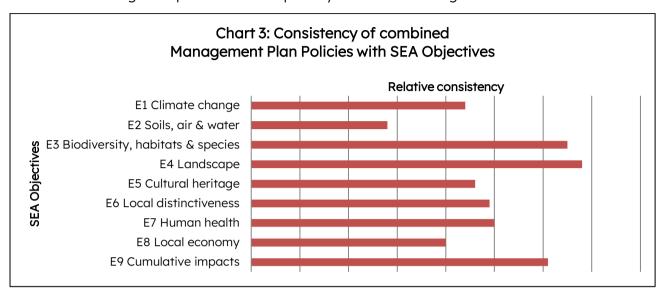


- 5.16. Chart 2 shows that climate change mitigation (CC1), Natural and cultural capital principles (CE3) and development & transport (CE13) stand out and nature recovery (CE8) is consistent with most SEA objectives. These support Defra's Environmental Improvement Plan priorities. Many other policies show a high consistency with the SEA Objectives. These include climate change adaptation (CC2), working in partnership (CC4), landscape (CE1), local distinctiveness (CE4), historic environment & cultural heritage (CE7), dark skies (CE6), water (CE9), farming & land management (CE10), access & recreation (UE2) and sustainable tourism (UE3). These support the priorities of the new government set out in July 2024.
- 3.17. The least interactions are shown by development priorities (CE15), major development (CE14) and waste management (CE16). These policies have a narrow purpose that does not focus on wider environmental issues.

# Consistency of combined Management Plan Policies with SEA Objectives

**3.18.** Each SEA Objective gains support from the Management Plan policies operating in combination (see **Chart 3**). The greatest support is given to landscape (E4), reflecting the purpose of NL designation, followed closely by biodiversity (E3), which reflects Defra's apex priority. Avoiding cumulative impacts (E9) gives comprehensive coverage, which

reflects the purpose of the management plan. Human health (E7) and local distinctiveness (E6) gain significant support. Climate change (E1) and cultural heritage (E5) gain reasonable consistency. This supports Defra's call for nature recovery and climate change adaptation to be a priority within the Management Plan.



3.19. The SEA Objective interacting least with the combined Management Plan policies is soils, air & water (E2). Only some of the policies relate specifically to the natural environment, the subject of this SEA Objective, but all those policies are consistent with the objective.

## **Findings**

3.20. There are no adverse effects and some significant beneficial effects. There is no need to consider measures to increase the beneficial effects of the Management Plan policies

# Review of alternative policies

- **3.21.** To meet with the requirements of the SEA Directive, the assessment needs to consider alternative options to determine whether the chosen pathway is the soundest in terms of the environment and wider sustainability. There is no record of any alterative options considered as a part of the management planning process.
- **3.22.** In this situation, the approach is to compare the effect of the proposed outcomes (and supporting policies) with a 'do-nothing' scenario informed by the trends identified in the SEA Scoping Report (as shown in **Appendix 3**). The task is to establish the environmental and sustainability benefits of the proposed policies over the 'do-nothing situation. This comparison is set out in **Appendix 6** and summarised in **Table 3**.

# Table 3: Summary of the comparison of the Management Plan Outcomes with the 'do-nothing' option

#### The Climate Emergency

There are many organisations that have the opportunity, authority and resources to take meaningful actions. However, the proposed polices offer some advantages over the do-nothing option as they support an area-wide approach. Others will also take this initiative but without coordination, opportunities may be lost. The management plan offers a more certain approach.

#### Nature's decline and the Ecological Crisis

There are many organisations that have the opportunity, authority and resources to take meaningful actions. Some of the proposed polices offer limited advantages over the do-nothing option, generally as they support an area-wide approach. Others will also act but without coordination, opportunities may be lost. Several management plan policies support the actions of others rather than adding extra initiatives. Actions, like volunteering and green prescribing, will only happen with active support from the management plan. The management plan offers a more certain approach.

#### Health and well-being

There are many organisations that have the opportunity, authority and resources to take meaningful actions. The management plan does not spell out the health and well-being benefits in each of its sections when others do. However, overall, the proposed polices offer some advantages over the donothing option as they support an area-wide approach. Others will act but without coordination, opportunities may be lost. There may be a more proactive approach with the plan in place.

## **Findings**

**3.23.** The findings are that the proposed outcomes and policies generally give greater environmental benefits than the 'do-nothing' situation as, overall, the management plan generally offers a more certain approach.

# 4. Monitoring

# Monitoring of significant environmental effects

- 4.1. The SEA Regulations require monitoring measures for all the significant effects, both positive and negative, identified in the assessment. The SEA of the draft management plan has identified no significant adverse effects that are likely to arise from the implementation of management plan. Some significant positive effects are likely to arise from the implementation of the plan. The assessment has also identified some areas of uncertainty over the significance of some of the predicted effects and monitoring will cover these effects as well.
- 4.2. There are likely to be several benefits in monitoring any environmental effects arising from the implementation of the management plan, including:
  - Identifying when action should be taken to reduce or offset any potential environmental effects of the plan;
  - Enhancing understanding of how the environment is changing in the National Landscape;
  - Tracking whether the plan has had any unforeseen environmental effects; and
  - Providing baseline data for future SEAs.

The advice is to incorporate the monitoring requirements of the SEA Regulations into a State of the AONB Report.

# **Monitoring Measures**

4.3. The SEA Scoping Report identified 29 potential indicators to monitor the environmental effects of implementing the Management Plan. These were reduced to 27 after consultation and are described **Appendices 4 and 7**.

#### **Data limitations**

- 4.4. There were some difficulties in securing all the data necessary for this assessment. This relates to the time available to search and secure data. There was only time to use existing data, it was not feasible to commission any new studies.
- 4.5. Strategic Assessment uses a combination of quantitative information from many sources (e.g. National Statistics and commissioned studies) and qualitative assessment using considered judgement. The qualitative approach is robust, given the strategic nature of the Management Plan. Detailed quantitative information relating to the effects of the plan is likely only to be available at a later stage.
- 4.6. Monitoring data are often subject to changes in methodology or reporting that may prevent the establishment of trend data from a known baseline date. Trend data and targets are the significant data gaps and these affect certain topics; in particular, effective and up-to-date reporting on the natural environment<sup>12</sup>. Pollution emission trends and aspects of air, soil (including contaminated land) and water quality are lacking. Consequently, the effects of diffuse pollution and other environmental impacts, such as recreation damage, are often difficult to ascertain.
- 4.7. Natural England's advice is to develop bespoke indicators to reflect the outcomes of National Landscape management decisions. The responsible authority agrees but it will take time to develop effective base-line data. Defra is currently working on its suite of national targets for protected landscapes. These cover the same three key areas of this plan, climate, nature and people. A monitoring framework, developed by Natural England, supports these targets. Targets and indicators from the PLTOF, along with additional local indicators, are integrated into the 2025 plan.
- 4.8. Census statistics help paint a picture of the nation and how we live. They provide a detailed snapshot of the population and its characteristics, and underpin funding allocation to provide public services. There was a Census in 2021.

## 5. Technical review

5.1. The prime purpose of the SEA process is to review the potential impacts of the Management Plan on the key environmental aspects of the National Landscape. There is also a requirement, however, to monitor the implementation of the Management Plan and its impact on the environment over time. The baseline indicators (Appendix 4) were

<sup>&</sup>lt;sup>12</sup> Defra, Natural England, Historic England and the Environment Agency, provide data cut to national landscape boundaries each year through the June Survey of Agriculture and the 'Protected Landscapes Targets and Outcomes Framework' (PLTOF).

<sup>19 |</sup> Page CRAGGATAK Consulting www.craggatak.co.uk

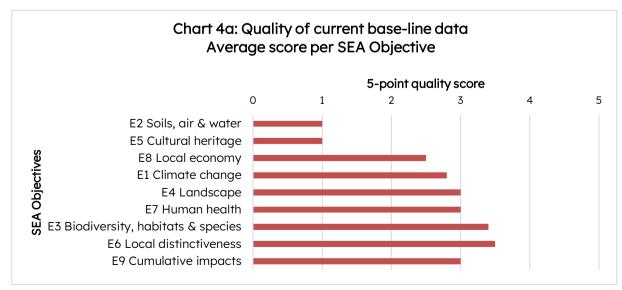
selected with this in mind and a monitoring programme against this framework is in place – either nationally through the PLTOF or through locally monitored indicators. Any local indicators that cannot (or will not) be monitored have been removed. The National Landscape Board must confirm its monitoring programme for the management plan, once adopted; and ensure that there is a collection programme to fully inform the next State of the NL report.

# Quality of existing baseline data

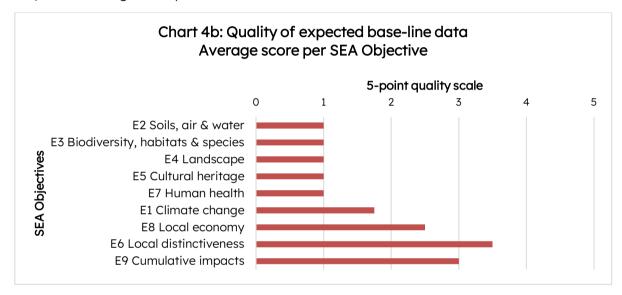
5.2. The assessment of the 27 SEA indicators is by a five-point quality scale. The analysis identifies where required data is weak or absent, so providing a framework for future data collection.

In	dicator 5-point q	uality scale
		Comment
1	Fit for purpose	
2	Adequate	Some minor improvements desirable
3	Indicative only	Not considered accurate
4	Inadequate	Little relevance to the AONB
5	Absent	No available data

- 5.3. The full assessment of each indicator against the nine SEA Objectives is set out in Appendix 7. Ten indicators are absent. This is because there is a delay in receiving six Protected Landscapes Targets and Outcomes Framework data sets from Defra (but these will arrive shortly), the absence of greenhouse gas emission data from Department for Energy Security and Net Zero, and data relating to local distinctiveness are subject to negotiation.
- 5.4. Considering the data currently available, 44% are 'fit for purpose' (12 indicators) and 7% are 'adequate' (2 indicators). Of the remaining indicators, 4% (1 indicator) is indicative, 4% (1 indicator) is inadequate, and 41% (11 indicators) are absent. Chart 4a shows the assessment for each of the SEA Objectives using the data currently available.



- 5.5. Monitoring measures are weak. Soils, air & water (E2) and Cultural heritage (E5) are fit for purpose. Local economy (E8) and Climate change (E1) are adequate. But Biodiversity (E3), Defra's highest priority, is showing as indicative. This is because some Defra data is missing. The Landscape (E4), Human health (E7) and Local distinctiveness (E6) indicators are at best indicative but may be inadequate. This is because there is still a need to source and secure relevant data. The Cumulative impacts indicator (E9) is indicative but monitoring for this topic is by annual reporting.
- 5.6. Taking account of the missing data sets that will arrive shortly, 74% will be 'fit for purpose' (20 indicators) and 7% remain 'adequate' (2 indicators). Of the remaining indicators, 4% (1 indicator) remains indicative, 4% (1 indicator) remains inadequate, and 11% (3 indicators) will still be absent. Chart 4b shows the assessment for each of the SEA Objectives using the expected data.



5.7. Monitoring measures are stronger but still have weaknesses. If the climate change and local distinctiveness data can be secured then most will be adequate, or better. Cumulative impacts (E9) will always remain as indicative but monitoring for this topic is by annual reporting.

## **Findings**

5.8. The current indicators will deliver an effective monitoring framework once all data is sourced and secured.

# 6. Response to Environmental bodies comments

- 6.1. The statutory consultation bodies are Natural England, Historic England and the Environment Agency. The SEA Environmental Report went out for consultation in November 2024, to which only Historic England responded.
- 6.2. Historic England reports that the SEA Environmental Report is a 'clear and well-presented report and assessment of the potential implications.' (Appendix 8).

## 7. Conclusion

- 7.1. The proposed Management Plan has a cascade of 14 outcomes addressed through 23 policies. The proposed policies are compatible. There are no tensions or sensitivities arising from where two or more interact. The proposed policy cascade has a beneficial, and in parts, a significantly beneficial, effect on the SEA Environmental Objectives.
- 7.2. Each SEA Objective gains strong support from the Management Plan Policies operating in combination, there are no weak relationships. The greatest interaction is with SEA Objectives to conserve and enhance landscape and biodiversity. This reflects that the area is a landscape designation. A particularly welcome finding is the strength of managing cumulative impacts that suggests that the Management Plan Policies avoid significant adverse effects between their actions.
- 7.3. There are no adverse effects on the SEA Environmental Objectives so there is no need to consider measures to increase the beneficial effects. There is no recommendation for mitigating actions.
- 7.4. The proposed policies generally give greater environmental benefits than the 'do-nothing' situation as, overall, the management plan offers a more certain approach. The plan deals with the key issues of climate change and nature recovery but most of the actions are mirrored by other players. The promotion of natural and cultural accounting is perhaps an exception. But the policies address the key issue of health and recreation quite proactively. The plan sets out an engagement agenda with people who do not currently seek out the benefits of the landscape, whether they be residents or live in the surrounding areas. Other bodies do also pursue such initiatives but the Management Plan is very clear about the needs and the means of satisfying them. It is not certain that other players would pick these up.
- 7.5. Though the management plan is balanced in its approach, future government policy is not yet certain. There are likely to be growing conflicts between objectives over the plan period. Climate change mitigation policies have a strong positive relationship with Nature Recovery and Landscape policies but that relationship may become negative at times. Inappropriate tree planting damaging nature recovery and landscape is but one example with a very real risk of occurring. The strong positive relationships and compatibility between policies are a result of having strong policies in place to manage this and similar risks. This also applies to consistency with SEA objectives and the comparison with the

- do-nothing scenario where Appendix 3 vividly outlines what could happen if these policies were not in place or followed.
- 7.6. The overall assessment of the current baseline data is that it is adequate; it will be good when the remaining Protected Landscapes Targets and Outcomes Framework data is supplied. There are opportunities to strengthen it further but this is limited by the need to source and secure data on local distinctiveness. The Board will publish a State of the National Landscape report. This will support the monitoring framework.
- 7.7. In conclusion: There is nothing in the management plan that will undermine the special qualities of the Cotswolds. Implementation of the proposed Management Plan will have environmental and sustainability benefits for the National Landscape.

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# **Appendices**

# Appendix 1: Management Plan policy framework

#### Vision

# A COTSWOLDS VISION: A NATIONAL LANDSCAPE FOR EVERYONE

#### A time of opportunity

The Cotswolds is good for us; we feel better when we are here and engaged with the natural beauty of the landscape around us. In recent years we have been reminded of the intrinsic relationship between ourselves and the natural world – and the condition it is in. We believe the Cotswolds National Landscape offers opportunities for optimism, regeneration, wellbeing, and inclusion.

# Challenges lie ahead

We are in the midst of a global climate emergency and an ecological crisis. Our awareness of ongoing social and economic inequalities is heightened. In the Cotswolds, these concerns are as real for us too, and we face significant challenges: climate change; threats to wildlife and habitat; changes to the farming landscape and agriculture; finding ways to deliver opportunities for younger people and provide for an ageing population; and achieving access to, and involvement in, the countryside for everyone – in ways which help benefit the countryside and encourage a diverse range of people to appreciate and care for the Cotswolds.

# What can we do, and how should we do it?

To address these issues and begin to make improvements, we need to challenge ourselves. We must avoid complacency, and not adhere doggedly to past beliefs – this will hold us back, and limit how much positive change we can introduce. Instead, we need to embrace new ways of thinking in order to find win-win solutions which both conserve and enhance natural beauty, and serve the people who are here. We will work hard, and in partnership – to find outcomes which offer the most positive benefits and the least negative impact. We will need to demonstrate collaboration and leadership. We will need to be energetic and proactive. We will need to be bold, brave, and confident. Above all, we will need to acknowledge that we can't do it all alone – we want to work with other organisations and individuals to achieve results which benefit all of us, and nature.

#### The future should be bright

The treasured landscapes which make the Cotswolds nationally and internationally important are diverse in character, as are the people who live, work, and visit here. There is no 'one size fits all' for the future – but we have a greater opportunity than ever before to pull together as communities across the Cotswolds, and to work with each other to harness our dedication and expertise to forge the future of the Cotswolds. This place, the Cotswolds National Landscape, is for everyone, from all walks of life. In sharing it and looking after it, we will continue to create a place that is vibrant, unique, welcoming, and truly special – for people and for nature. We will work towards ensuring that the Cotswolds stays a working landscape, where agriculture thrives and supply chains are secure. Our communities should be connected and diverse, but self-sustaining. Visitors should feel welcome to enjoy being here, confident about access, and motivated to give something back to help look after the landscape. This should be a place where the landscape, nature, and people work in harmony with each other.

The Cotswolds will be a place that will inspire generations of people to look after it – now and in the years ahead.

## Aims & Policies

#### CROSS CUTTING AIM: Tackling 21st century issues through progressive partnerships.

**Outcome 1 – Climate action:** We are on target to achieve net zero (or better) within the Cotswolds National Landscape by 2050 (or sooner), as a result of stakeholders implementing a clearly defined pathway to net zero, whilst also adapting to the consequences of climate change.

# POLICY CC1: Climate Change – Mitigation

CC1.1. Climate change mitigation including the sequestration of carbon should be a key component of land management practices and Environmental Land Management, and rural development support mechanisms in the National Landscape. Examples include:

- Increase canopy cover through increased tree cover and woodland and hedgerow creation.
- Measures that capture and store carbon in soil such as using herb-rich leys, minimising cultivation and wildflower grassland restoration.
- Extensive grazing and integrating extensive livestock systems with arable production.

CC1.2. Greenhouse gas emissions should be minimised through reducing energy demand in existing and new buildings and infrastructure by:

- Improving energy efficiency, for example, by retrofitting existing buildings. Where traditional buildings including listed buildings are retrofitted and this effects the fabric of the building, this must be undertaken by historic building specialists and in a manner that is compatible with the purpose of National Landscape (AONB) designation;
- Reducing embodied carbon through the use of sustainably sourced timber and secondary and recycled materials within all construction unless demonstrably unachievable on technical and practical grounds;
- Utilising passive measures, for example the orientation of buildings, passive house design and the provision of high levels of insulation;
- Additional glazing, solar panels, heating systems (e.g. air or water source heat pumps) and low carbon driveway materials should be considered.
- Sustainable construction methods and management plans to reduce and manage construction waste should be implemented;
- Incentivising voluntary sustainability standards, for example BREEAM, Building with Nature, and One Planet Living principles.

CC1.3. Greenhouse gas emissions should be minimised through reducing emissions from both residents' and tourists' transport and travel by:

- Reducing car use for example, through increasing green and active travel including public transport and increasing shared mobility through car sharing schemes;
- Reducing the need to travel for example by encouraging home working and affordable housing provision close to sources of employment, services and facilities;
- Improving the sustainability of travel through for example; a comprehensive bus service linked to public transport hub promotion/integration and information.
- o Prioritise the provision of walking, cycling and public transport use, including adequate cycle parking and safe cycle routes.
- Providing sufficient infrastructure for the charging of electric vehicles, scooters and bikes;
- Promoting messages aimed at minimising air travel by Cotswolds residents.

- o Developers should be encouraged to evidence how their development will support active travel and public transportation use. This includes incorporation of cycle storage, workplace lockers, changing, dry room and shower facilities to encourage staff active travel, car club provisions, EV charging points that go above and beyond the current Building Regulations.
- CC1.4. Greenhouse gas emissions should be minimised through generating and distributing energy from low carbon sources in a manner consistent with the purpose of National Landscape (AONB) designation, this plan and associated guidance including the CNL Renewable Energy Position Statement (June 2023):
  - o All developments, should have a net zero operational carbon balance and 100% energy provided by low carbon sources.
  - o Support community-led renewable energy production, in line with the CNL Renewable Energy Position Statement.
- CC1.5 Greenhouse gas emissions from food production should be minimised by supporting the development of community food networks, linking farmers and businesses to each other and consumers; promote the purchasing locally produced food products and services and encouraging small-scale vegetable growing in gardens and allotments.
- CC1.6. Climate action should be undertaken in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the Cotswolds National Landscape.
- CC1.7. Stakeholders should work towards the delivery of the relevant targets for climate change within the national Protected Landscapes Targets and Outcomes Framework.
  - Target 6. Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050 relative to 1990 levels.
  - Target 8. Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).
  - Target 7 has been excluded as it concerns the area of peat restored.
  - Target 8 is currently being apportioned across protected landscapes nationally and will additionally be further informed by local woodland opportunity mapping. The local target is likely to exceed the apportioned national target.

# POLICY CC2: Climate Change - Adaptation

- CC2.1. The risks posed by the consequences of climate change should be reduced through a range of adaptation measures, including those identified in:
  - relevant policies of this Management Plan. (references added in final version)
  - the CNL Climate Change Strategy (2022)
  - The CNL Climate Change Adaptation Plan (to be published by XXXX)
- CC2.2. Climate change adaptation should be a significant driver in the design of all new development, infrastructure and transport provision.

CC2.3. Climate change adaptation should be a key component of land management practices and Environmental Land Management and rural development support mechanisms, in the National Landscape.

CC2.4. Further research into the predicted impacts of climate change on the CNL should be undertaken. This research should be used to advise and inform sustained behavioural change to adapt to climate change and conserve and enhance the National Landscape and its special qualities.

**Outcome 2 – Working together:** Through collaborative partnerships and a shared understanding, the purposes of the Cotswolds National Landscape and its Board are applied consistently across the whole area.

# POLICY CC3: Compliance with section 85 of the Countryside and Rights of Way Act

CC3.1. Relevant authorities, including public bodies and statutory undertakers, must seek to further the purpose of conserving and enhancing the natural beauty of the CNL, in line with Section 85 of the Countryside and Rights of Way Act 2000.

# POLICY CC4: Working in partnership

CC4.1. Stakeholders should work in partnership to support the purposes of conserving and enhancing the natural beauty of the Cotswolds National Landscape (CNL) and increasing the understanding and enjoyment of its special qualities. Stakeholders should also cooperate in fostering the economic and social wellbeing of communities in and around the National Landscape.

CC4.2. Communities and businesses within and around the CNL should be encouraged to value and celebrate being part of a nationally recognised landscape and to contribute to the purpose of national landscape designation.

## CONSERVE & ENHANCE AIM: Influencing and delivering for landscape, nature and climate.

**Outcome 3 – Landscape:** The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.

#### POLICY CE1: Landscape

CE1.1. Proposals that are likely to impact on, or create change in, the landscape of the Cotswolds National Landscape (CNL), should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the landscape character of the location, as described by the CNL Board's Landscape Character Assessment and Landscape Strategy and Guidelines. There should be a presumption against the loss of key characteristics identified in the landscape character assessment.

CE1.2. Proposals that are likely to impact on, or create change in, the landscape of the CNL, should seek to further the conservation and enhancement of the scenic quality of the location and its setting, views, including those into and out of the National Landscape and visual amenity.

CE1.3. Conserving and enhancing landscape character should be a key objective of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape.

CE1.4. Rural skills training and the utilisation of those skills – such as dry stone walling, stone-masonry, woodland creation and management and hedgelaying – should be supported to ensure the long-term retention, creation and management of the key features of the Cotswolds National Landscape.

# POLICY CE2: Geology and Geomorphology

- CE2.1. Proposals that are likely to impact on the geological and geomorphological features of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these features.
- CE2.2. The geological and geomorphological features of the CNL should be conserved and enhanced through effective management.
- CE2.3. Opportunities should be sought to promote awareness and understanding of the geological and geomorphological features of the CNL.
- CE2.4. Exploration and research into the geology and geomorphology of the CNL should be continued in order to improve understanding of the landscape, and of the geological resource and its importance to inform the conservation and management of geological and geomorphological sites.

# POLICY CE3: Natural & Cultural Capital – Principles

- CE3.1. The natural and cultural capital of the Cotswolds National Landscape (CNL), and the services they provide, should continue to be assessed and evaluated.
- CE3. 2. The use of natural and cultural capital accounting should be encouraged in order to fully understand the implications of investment, development and management decisions.
- CE3.3. The financial and non-financial benefits of natural and cultural capital and the services they provide should be promoted.
- CE3.4. Proposals affecting the CNL should have regard to and seek to conserve and enhance the natural and cultural capital of the CNL and the services they provide.
- CE3.5. Natural and cultural capital and the services they provide should be key components of Environmental Land Management and rural development support mechanisms in the CNL.

**Outcome 4 – Local distinctiveness:** In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.

# POLICY CE4: Local Distinctiveness

CE4.1. Proposals that are likely to impact on the local distinctiveness of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this local distinctiveness. This should include:

- being compatible with the CNL Board's Landscape Character Assessment, Landscape
- Strategy and Guidelines, Local Distinctiveness and Landscape Change and any relevant
- position statement or guidance published by the Board.
- being designed to respect local settlement patterns, building styles, scale and materials
- and in accordance with design guidance prepared by local planning authorities;
- using an appropriate colour of Cotswold limestone to reflect local distinctiveness.

CE4.2. Innovative designs, compatible with the conservation of natural beauty – which are informed by local distinctiveness, character and scale – should be welcomed.

CE4.3. The development of design guidance – which is supported by a robust evidence base and which reflects relevant guidance published by the CNL Board – will be encouraged.

CE4.4. Provision should be made for the quarrying of limestone, at an appropriate scale, in order to provide building materials that help maintain and enhance the local distinctiveness of the National Landscape. Any production of aggregate and agricultural lime should only be as by-product for local use (within the CNL) and only for essential operational purposes, with sufficient material being left to deliver the agreed restoration plan (or a more natural landform) without relying on imported material. Any such mineral sites should be required to demonstrate that they do not have any significant adverse effects on the natural beauty of the National Landscape including its special qualities or the integrity of existing wildlife sites. Where there are multiple quarries in close proximity to each other, consideration should be given to cumulative impacts, including the impact of HGV movements.

**Outcome 5 – Tranquillity**: Noise pollution and visual disturbance are minimised to maintain tranquillity across the Cotswolds National Landscape.

#### **POLICY CE5: Tranquillity**

CE5.1. Proposals that are likely to impact on the tranquillity of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of this tranquillity, by seeking to avoid and where avoiding is not possible, minimise noise and other aural and visual disturbance.

CE5.2. Measures should be taken to remove and where removal is not possible, minimise existing sources of noise and other aural and visual disturbance in order to enhance the tranquillity of the CNL.

CE5.3. Proposals that are likely to impact on the tranquillity of the CNL should have regard to – and be compatible with – the CNL Board's Tranquillity Position Statement.

**Outcome 6 – Dark skies:** Fewer areas of the Cotswolds National Landscape are affected by light at night.

#### **POLICY CE6: Dark Skies**

CE6.1. Proposals that are likely to impact on the dark skies of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these dark skies, by seeking to avoid and where avoiding is not possible, minimise lighting.

CE6.2. Measures should be taken to increase the area of dark skies in the CNL by removing and, where removal is not possible or appropriate, reducing existing sources of lighting.

CE6.3. Proposals that are likely to impact on the dark skies or dark landscapes of the CNL should have regard to and be compatible with:

- best practice standards and guidance, in particular, that published by the Institution of Lighting Professionals and the Commission for Dark Skies.
- the National Landscapes Board's Dark Skies & Artificial Light Position Statement.

CE6.4. Consideration will be given to seeking a formal dark sky designation for those parts of the Cotswolds National Landscape that are least affected by light pollution.

Outcome 7 – Historic environment and cultural heritage: The historic environment and cultural heritage of the Cotswolds National Landscape is better understood, conserved and enhanced.

# POLICY CE7: Historic Environment and Cultural Heritage

- CE7.1. Proposals that are likely to impact on the historic environment and cultural heritage of the Cotswolds National Landscape (CNL) should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these heritage assets and their setting. This should include respecting the historical elements of landscape character including features such as; buildings, sites, layout and context, including the relationship between the existing feature or settlement and the landscape.
- CE7.2. Heritage and Cultural Heritage Impact Assessments should be used when considering any change to a heritage asset and to influence decisions regarding the management of the historic environment and cultural heritage assets.
- CE7.3. The historic environment and cultural heritage of the CNL, both designated and non-designated, should be conserved and enhanced through effective management.
- CE7.4. Designated historic environment sites, such as scheduled monuments and listed buildings, and non-designated heritage assets of equivalent significance, should be protected, in line with national policy and guidance.
- CE7.5. Historic environment and cultural heritage should be a key component of Environmental Land Management and rural development support mechanisms in the CNL.
- CE7.6. Opportunities should be sought to promote the awareness, understanding and use of Historic Environment Records, Conservation Area Appraisals, Historic Landscape Characterisation and Heritage Strategies and Action Plans. These should be used to influence decisions regarding the management of the CNL's historic environment and cultural heritage.
- CE7.7. The cultural heritage of the Cotswolds should be better understood and celebrated in arts, cultural, and social activities across the National Landscape.
- CE7.8. Stakeholders should work towards the delivery of the relevant targets for heritage assets within the national Protected Landscapes Targets and Outcomes Framework. The indicators for monitoring this target are outlined in appendix 6.
  - Target 10 Decrease the number of nationally designated heritage assets at risk in Protected Landscapes.

Outcome 8 – Nature recovery and biodiversity: There is concerted unified action for a widespread recovery of nature – conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.

## POLICY CE8: Nature Recovery and Biodiversity

- CE8.1. Biodiversity (including the abundance of wildlife) in the Cotswolds National Landscape (CNL) should be conserved and enhanced by establishing a coherent and resilient nature recovery network across the CNL and in its setting. This should be achieved in accordance with the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan and Local Nature Recovery Strategies (LNRSs), and focus on the priority species and habitats listed in Appendix 8. The relevant LNRS's are:
- i. Gloucestershire Add Link when final version published

- ii. Oxfordshire Add Link when final version published
- iii. Warwickshire Add Link when final version published
- iv. West of England Add Link when final version published
- v. Wiltshire Add Link when final version published
- vi. Worcestershire Add Link when final version published

CE8.2. Policy and strategic documents that are likely to impact on the biodiversity of the CNL should have regard to the CNL Management Plan and guidance including the Cotswolds Nature Recovery Plan and position statements. This includes but is not limited to, the following:

- i. Local Plans.
- ii. Local Nature Recovery Strategies
- iii. Neighbourhood Development Plans.
- iv. Green Infrastructure Strategies.
- v. Tree and Woodland Strategies.
- vi. Ecological Emergency and Climate Change Strategies.

CE8.3. Proposals that are likely to impact on the biodiversity of the National Landscape should seek to further the conservation and enhancement of this biodiversity. They should have regard to – and be consistent with the CNL Management Plan and guidance including the Cotswolds Nature Recovery Plan. This would include, but is not limited to, the following delivery mechanisms:

- i. Environmental Land Management and other grant schemes and rural development support mechanisms;
- ii. Biodiversity Net Gain;
- Payment for Ecosystem Services including but not limited to carbon sequestration and storage, flood management, water supply and water quality improvements.

CE8.4. Stakeholders should work towards the delivery of the relevant targets for nature recovery within the national Protected Landscapes Targets and Outcomes Framework. The apportioned targets for the Cotswolds to be achieved are:

- Target 1. Restore or create more than is 28,079 hectares of a range of wildlife-rich habitats outside protected sites by 2042 (from a 2022 baseline). Interim target based on Nature Recovery Plan.
- Target 2. 80% Percent of SSSIs in favourable condition by 2042
- Target 3. 60% Percent of SSSIs assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.
- Target 4. Continuing favourable management of all existing priority habitat already In favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri-environment schemes by 2042.
- Target 5. 65% to 80% of land managers adopting nature-friendly farming on at least 10% to 15% of their land by 2030.
- Target 8. Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).

Target 8 is currently being apportioned across protected landscapes nationally and will additionally be further informed by local woodland opportunity mapping. The local target is likely to exceed the apportioned national target.

CE8.5. A mitigation hierarchy should be applied to development proposals whereby adverse impacts on biodiversity are: (i) avoided; (ii) mitigated; and (iii) compensated for. Development proposals should provide a net gain in biodiversity of at least 20% particularly with regard to the species and habitats listed in Appendix 8.

CE8.6. Damage or loss of irreplaceable habitat should be avoided. Irreplaceable habitat includes but is not limited to:

- Ancient and veteran trees
- II. Ancient woodland (continually wooded since 1600);
- III. Ancient unimproved grassland (surviving since 1945);
- IV. Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840).

This will be reviewed in the light of the outcome of the proposed Defra consultation.

CE8.7. Development near the habitats listed in appendix 8 should secure significant gains in the form of enhancing existing habitat condition, buffering the habitat and improving greater connectivity between similar habitats.

CE8.8. Measures to conserve and restore biodiversity including the outcomes, priorities, targets and measures within the Cotswolds Nature Recovery Plan should be delivered in a way that is compatible with conserving and enhancing the natural beauty of the Cotswolds National Landscape.

**Outcome 9 The water environment:** Watercourses and bodies of water within the Cotswolds National Landscape have good ecological and chemical status.

#### **POLICY CE9: Water**

CE9.1. Water resources should be managed and conserved to: improve water quality; ensure adequate aquifer recharge; ensure adequate river flows; and contribute to natural flood management systems.

CE9.2. Development (new and existing sites) should assess and minimise flood risk and implement sustainable drainage schemes, adopt high water efficiency standards in line with RIBA 2030 Climate Challenge and domestic water use targets, and water conservation measures, for example rainwater harvesting and/or water recycling and grey water systems.

CE9.3. New development that links to the sewerage system should not be commenced until the sewerage infrastructure (including the relevant sewage treatment works) has sufficient capacity to cope with the additional load, including future loads resulting from changing rainfall patterns.

CE9.4. Sewage pollution from storm overflows and continuous outfalls should be minimised and be at least within legal and regulatory requirements.

CE9.5. Phosphorus treatment should be provided at all sewage treatment works to achieve good Water Framework Directive (WFD) status for Phosphate.

CE9.6. Planning conditions such as the provision of appropriate manure storage facilities for farming and/or equestrian sites, including disposal

frequency and method etc. can be explored to help mitigate run off and subsequent water contamination. Similar conditions can be imposed to septic tanks and cess pits, to prevent degradation and overflow and subsequent contamination.

CE9.7. Practical measures to improve water quality and quantity should be implemented including:

- I. The restoration of river and wetland habitats. New wetland habitats could be sited to intercept runoff from roads and reedbeds can be created to filter potentially polluted water from settlements before it is discharged to rivers.
- II. Minimising soil erosion and run off by implementing soil conservation measures including habitat creation.
- III. Minimising pesticide and artificial fertiliser use and implementing measures to reduce pollution from agriculture
- IV. Promote individual measures and behaviours in the home and workplace that protect water volume and quality in rivers.
- V. Citizen science programmes to monitor water quality.

CE9.8. For proposals on sites incorporating or located adjacent to watercourses, opportunities should be sought through careful design and landscaping to re-naturalise the water courses where possible, including restoration of the bankside and instream habitats and leaving an undeveloped buffer zone of at least 10 metres width

Outcome 10 – Farming and land management: Farming and land management conserves and enhances the natural beauty of the Cotswolds National Landscape in ways which balance the needs of recovering nature, climate action, food production, supporting livelihoods and public access.

# POLICY CE10: Farming and Land Management

CE10.1. Farming and land management in the Cotswolds National Landscape (CNL) and in the setting of the CNL should be compatible with and seek to further the conservation and enhancement of the natural beauty of the CNL. It should also help increase the understanding and enjoyment of the CNL's special qualities.

CE10.2. Farming and land management in the CNL and in the setting of the CNL should be compatible with and seek to further the CNL Management Plan. It should also be compatible with and seek to further guidance produced by the CNL Board, including the:

- i. CNL Landscape Strategy and Guidelines
- ii. CNL Landscape Character Assessment
- iii. CNL Local Distinctiveness and Landscape Change
- iv. CNL Board Position Statements
- v. Cotswolds Nature Recovery Plan
- vi. CNL Pathway to Net Zero and Climate Change Strategy

CE10.3. Woodland creation and tree planting proposals (including natural colonisation) should be compatible with seek to further the conservation and enhancement of the natural beauty of the CNL in accordance with guidance produced by the CNL Board. In particular they should:

- Work with the landscape character of their setting and compliment the open views that people enjoy from viewpoints, roads and public rights of way.
- ii. Be located where they best meet the objectives of the nature recovery network, improving the connectivity of woodland habitats

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whilst avoiding damaging other habitats and their potential to be better connected.
iii. Be located in accordance with the CNL canopy cover opportunity mapping.
CE10.4. Farmers and land managers should have access to clear and consistent sources of advice, guidance and support, including fair access to markets and payments for environmental services.
CE11.1. The population of grey squirrel and deer in the Cotswolds National Landscape (CNL) should continue to be controlled and managed. This should be undertaken and coordinated at a landscape scale.
CE11.2. National guidance – and guidance produced by the CNL Board – on Ash Dieback should be followed to ensure any measures implemented will conserve and enhance the qualities of the landscape.
CE11.3. National and local guidance – including guidance from Government Agencies and the Non-Native Species Secretariat – on invasive non-native species, pests and diseases should be followed and appropriate biosecurity measures promoted.
CE12.1. Soil degradation should be halted and reversed by managing soils in a way that: (i) increases organic content, water retention and carbon sequestration; and (ii) minimises erosion, water pollution and compaction.
CE12.2. Soil management should remain a key component of Environmental Land Management and rural development support mechanisms in the Cotswolds National Landscape (CNL).
t and transport: Development and transport schemes positively contribute landscape designation and also play a key role in facilitating the eing of local and rural communities.
CE13.1. Development and transport proposals in the Cotswolds National Landscape (CNL) and its setting should be delivered in a way that is compatible with and seek to further the conservation and enhancement of the natural beauty of the CNL including its special qualities. In doing so, they should have regard to – and be compatible with the CNL Management Plan and guidance produced by the CNL Board, including the:

- (i) CNL Landscape Strategy and Guidelines
- (ii) CNL Landscape Character Assessment
- (iii) Cotswolds Nature Recovery Plan
- (iv) CNL Local Distinctiveness and Landscape Change
- (v) CNL Board Position Statements
- (vi) CNL Pathway to Net-Zero

CE13.2. Development and transport proposals in the CNL should be delivered in a way that is compatible with and seek to further the purpose of increasing the understanding and enjoyment of the CNL's special qualities. They should also contribute to the economic and social wellbeing of CNL communities, in a way that is compatible with conserving and enhancing the natural beauty of the CNL.

CE13.3. Development and transport proposals in the CNL and its setting should comply with relevant national planning policy and guidance,

particularly with regards to those paragraphs of the National Planning Policy Framework (NPPF) that relate to national landscapes.

CE13.4. The purposes of conserving and enhancing the natural beauty of the CNL and increasing the understanding and enjoyment of the CNL special qualities should be identified as strategic priorities in Local Plans, Neighbourhood Plans, Local Transport Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the CNL Management Plan as a material consideration.

CE13.5. The cumulative impacts of development proposals on the natural beauty of the CNL should be fully assessed.

CE13.6. A landscape-led approach should be applied to development and transport proposals in the CNL and its setting, proportionate to the type and scale of development being proposed, whereby proposals:

- a) address the natural beauty of the CNL as primary consideration at all stages of the development process (including design), from initial conception through to implementation
- b) address all of the factors that contribute to the natural beauty of the area
- address access to natural beauty including the character of the public rights of way network and its role within wider green infrastructure
- d) reflect and enhance the character of the local area
- e) avoid adverse effects where possible and, if adverse effects can't be avoided, minimise them
- f) seek opportunities to enhance the natural beauty of the CNL and
- g) deliver substantially more beneficial effects than adverse effects for the natural beauty of the CNL.

This landscape-led approach is particularly important for major development .

# POLICY CE14: Major Development

CE14.1. In line with national planning policy, permission should be refused for major development within the Cotswolds National Landscape (CNL), in the context of paragraph 183 of the National Planning Policy Framework (NPPF), other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

CE14.2. Relevant stakeholders should fully assess relevant site allocations and development proposals to see if they constitute major development. In considering or deciding whether a proposed development constitutes major development, relevant stakeholders should have regard to the major development checklist in Appendix 5 of the Board's Landscape-led Development Position Statement.

CE14.3. Local authorities and other relevant stakeholders should explicitly state whether they consider relevant allocations and development proposals to be major development.

CE14.4. The mandatory major development 'tests' specified in paragraph 183 of the NPPF should be rigorously applied and documented for all allocations and development proposals that are deemed to be major development.

CE14.5. When relevant stakeholders are considering or applying the major development 'tests' specified in paragraph 183 of the NPPF, it should be recognised that:

- 'exceptional need' does not necessarily equate to 'exceptional circumstances';
- no permission should be given for major development save to the
  extent the development was needed in the public interest, met a
  need that could not be addressed elsewhere or in some other
  way and met that need in a way that to the extent possible,
  moderated detrimental effect on the environment, landscape
  and recreational opportunities.

CE14. 6. When making decisions on major development proposals, local authorities (and/or other relevant decision makers) should not simply weigh all material considerations in a balance, but should refuse an application unless they meet the exceptional circumstances and public interest criteria.

### POLICY CE15: Development Priorities & Evidence of Need

CE15.1. Housing delivery in the Cotswolds National Landscape (CNL) should be focused on meeting affordable housing requirements, particularly housing that is affordable in perpetuity such as social rented housing.

CE15.2. When local planning authorities are reviewing their Local Plans, they should give consideration to setting policies for affordable housing provision in the CNL that require:

- at least 50% affordable housing in market housing developments
- 100% affordable housing on Rural Exception Sites, with a lower percentage only
- being permitted in exceptional circumstances and the absolute minimum being 75%
- on-site affordable housing provision for housing developments of five units or fewer

CE15.3. Priority should be given to maintaining and enhancing local community amenities and services and improving access to these amenities and services. Priority should also be given to supporting local employment opportunities.

CE15.4. It should be recognised that:

- a) The housing need figure derived from the Government's 'standard method' for calculating housing need is an unconstrained assessment of housing need and does not present a target for housing provision.
- b) The decision on how many homes should be planned for (i.e., the 'housing requirement' figure in Local Plans) should only be made after consideration of the constraints that the local authority faces, including the AONB designation, and consideration of the land that is actually available for development. As such, when these constraints are factored in, the 'housing requirement' could potentially be smaller than the standard method's 'housing need' figure.
- c) The application of national planning policies relating to national landscapes may mean that it is not possible to meet objectively assessed needs (OAN) in full in local authority areas that overlap with the CNL.
- (d) The CNL is unlikely to be a suitable area for accommodating unmet needs from adjoining, non-designated areas. In the context of the CNL, this includes unmet needs relating to adjacent urban areas and

- unmet needs arising in local authority areas that do not overlap with the CNL.
- (e) Meeting housing need is never a reason to cause unacceptable harm to the CNL.
- (f) The scale and extent of development in the CNL should be limited.

CE15.5. Consideration should be given to whether the constraints relating to the national landscape designation merit 'exceptional circumstances' which may justify using an alternative approach to the standard method for assessing housing need.

CE15.6. When the allocation of sites is being considered in the Local Plan process, regard should be given to the evidence of need specific to: (i) the settlement/parish where the allocation is being proposed; and (ii) the CNL 'sub-area' within which the allocation is being proposed.

CE15.7. Within the CNL, windfall housing proposals on undeveloped land adjoining, or outside of, built up area boundaries (or equivalent) should only be supported where there is robust evidence of a specific local housing need such as needs identified through a neighbourhood plan or affordable housing needs specific to a particular settlement.

CE15.8. Where choice-based lettings systems, such as Homeseeker Plus, are used as part of the evidence base for affordable housing need:

- the 'local connection' component of the choice-based lettings system should be applied consistently; and
- data from the choice-based lettings systems should not be used explicitly as a measure of affordable housing need unless the data has been verified and there is a clear local connection to – and preference for – the settlement in question.

CE15.9. When local authorities are reviewing their Local Plans, they should give consideration to setting policies that ensure that new market housing is used as a principal residence rather than as a second home or holiday home.

## POLICY CE16: Waste Management and the Circular Economy

CE16.1. Waste management should align with the following hierarchy, as set out in the Government's Waste Management Plan 2021:

- a. Prevention
- b. Prepare for reuse
- c. Recycling
- d. Other recovery
- e. Disposal

CE16.2. Measures that help to deliver a circular, or closed-loop, economy, in which waste generation is avoided, should be encouraged.

CE16.3. Proposals for new landfill sites and strategic waste facilities should not normally be permitted in the Cotswolds National Landscape (CNL), especially where they involve importing significant amounts of waste into the CNL (for example, waste generated in neighbouring urban areas).

CE16.4. Any waste management facilities that are permitted in the CNL should: (i) be sited in such a way that adverse environmental impacts are minimised, in line with relevant permitting regimes; and (ii) be primarily to receive waste that arises within the CNL (within close proximity to the proposed facility).

CE16.5. The management or use of waste by way of depositing it to land as an inert 'recovery' operation, land raising and bunding or for further restoration of previous landfill operations, should only be allowed: (i) in very limited circumstances within environmental limits; (ii) where it can demonstrate a significant net-benefit for the conservation and enhancement of the natural beauty of the CNL; and (iii) where it complies with the policies of the relevant Waste Local Plan and relevant environmental regulations.

# INCREASING UNDERSTANDING & ENJOYMENT AIM: Ensuring access, learning and wellbeing opportunities are for everyone.

Outcome 12 – Health and wellbeing: The Cotswolds National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.

# POLICY UE1: Health and Well-being

UE1.1. Further opportunities for improving health and wellbeing in the Cotswolds National Landscape (CNL) should be created, improved and promoted, including, where appropriate, the provision of: green spaces or water within easy reach of communities; walking, cycling and riding routes, including routes for disabled people; opportunities to access and interact with nature; and volunteering and personal development opportunities.

UE1.2. Children and young people resident within and around the CNL should be provided with environmental education opportunities to experience the CNL through direct contact with the natural environment.

UE1.3. The health sector should make greater use of the benefits that the National Landscape provides for the health and wellbeing of residents and visitors, for example, by prescribing exercise in the CNL countryside.

**Outcome 13 – Access and recreation:** The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.

# POLICY UE2: Access & Recreation

UE2.1. A safe, pleasant, accessible, clearly waymarked and well-connected Public Rights of Way network that welcomes people of all abilities should be maintained, enhanced and promoted across the Cotswolds National Landscape (CNL) and into surrounding communities.

UE2.2. Improvements to access and recreation provision including rights of way should be undertaken in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of CNL. Innovative ways of providing named routes without introducing additional signage should be explored. This should be balanced with the needs of groups that lack confidence in exploring the countryside, sensitive sites and of landowners and farmers who need to keep people on designated routes.

UE2.3. Open Access Land and other land including Country Parks, that is open to public access should be maintained, enhanced and promoted across the CNL. Where appropriate, more land should be made available for public access.

UE2.4. Sustainable funding for National Trails, including the Cotswold Way and Thames Path, should be secured.

UE2.5. Visitors, residents and local communities should be provided with opportunities to increase their understanding and enjoyment of the special qualities of the CNL.

UE2.6. A priority for engagement in the CNL should be individuals who are not currently enjoying or engaged with the benefits of the landscape.

Particularly those from within the CNL and from the surrounding urban areas, especially those from areas of high deprivation and those that are not traditional visitors to the Cotswolds.

UE2.7. Easily accessible online, downloadable and onsite resources for walking, cycling, horse riding, volunteering and educational activities should be provided in the CNL to help promote access to the area and understanding and appreciation of its special qualities.

UE2.8. Visitor facilities and routes that are accessible to those of all abilities should be provided.

UE2.9. Guided walks and activities for those who are not confident walking in the countryside should be provided to increase confidence and share knowledge of the CNL and its special qualities.

UE2.10. Arts and cultural experiences should be provided to encourage people to deepen their emotional connection to the landscape and support the engagement of new and existing audiences.

UE2.11. The Countryside Code should be promoted to educate visitors and communities to act appropriately in the countryside and to improve understanding between visitors and those living and working in the area.

UE2.12. The provision of new, and level of use of existing, access and recreational opportunities should be delivered in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the CNL. Where recreational use is having or is likely to have, an adverse impact on the natural beauty of the National Landscape or on the integrity of existing wildlife and historic sites, steps should be taken to evaluate, prevent or mitigate these impacts. Such steps can include enhanced maintenance and wayfinding, onsite engagement, legal restrictions, and the provision and promotion of access and recreational opportunities in new alternative suitable locations

UE2.13. Where there is a conflict between (i) conservation and enhancement of natural beauty and (ii) public enjoyment of this natural beauty in the CNL, the conservation and enhancement of natural beauty should be given greater weight.

UE2.14. Stakeholders should work towards the delivery of the relevant target for access and recreation within the national Protected Landscapes Targets and Outcomes Framework. The indicators for monitoring this target are outlined in appendix 6.

Target 9 Improve and promote accessibility to and engagement with Protected Landscapes for all using existing metrics in our Access for All programme.

**Outcome 14 – Sustainable tourism:** Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape.

# POLICY UE3: Sustainable Tourism

UE3.1. Tourism within the Cotswolds National Landscape (CNL) should be delivered and managed in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of CNL and should minimise the emission of greenhouse gases in accordance with policy CC1.

UE3.2. Visitors, residents, local businesses and communities should be provided with opportunities to directly contribute to conserving and enhancing the natural beauty of the CNL and improve access to the area through local individual, community and employee volunteering opportunities.

UE3.3. The 'Caring for the Cotswolds' visitor giving scheme will raise awareness of the CNL and generate funds from visitors to directly help to look after it by supporting projects which conserve habitats and species, look after heritage and landscape, improve access, and help provide education resources encouraging people to understand the landscape and nature better.

UE3.4. Visitors should be provided with a variety of accommodation options over a range of prices. The siting and design of visitor accommodation should be compatible with conserving and enhancing the natural beauty of the CNL including its special qualities.

UE3.5. Air travel arising from the Cotswolds as a destination should be minimised.

UE3.6. Existing sustainable and integrated transport initiatives should be supported and new initiatives developed to help facilitate the car free visitor experience.

# Appendix 2: Other plans and policies

#### INTERNATIONAL

Ramsar Convention on Wetlands of International importance, especially waterfowl habitat (1971)

www.ramsar.org

Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979) (came into force on 1 June 1982)

www.coe.int/t/dg4/cultureheritage/nature/bern/default\_en.asp

Paris Agreement United Nations Framework Convention on Climate Change (2015)

http://unfccc.int/paris agreement/items/9485.php

#### **EUROPEAN**

The Birds Directive (Directive on Conservation of Wild Birds) (79/409/EEC) (Adopted 1979)

http://ec.europa.eu/environment/nature/legislation/birdsdirective/index\_en.htm

The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention) Council of Europe (121) 1985

http://conventions.coe.int/Treaty/Commun/QueVoulezVous.asp?NT=121&CM=1&CL=ENG

European Convention on the Protection of the Archaeological Heritage (revised 1985)

http://conventions.coe.int/Treaty/en/Treaties/Html/143.htm

Nitrates Directive (91/676/EEC) (1991)

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:1991:375:0001:0008:EN:PDF

The Habitats Directive (Directive on the Conservation of Natural Habitats and Wild Fauna and Flora) (Directive 92/43/EC) (1992)

http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index\_en.htm

The Landfill Directive (99/31/EC) (1999)

http://ec.europa.eu/environment/waste/landfill\_index.htm

The Water Framework Directive (2000/60/EC) (2000)

http://ec.europa.eu/environment/water/water-framework/index\_en.html

The Strategic Environmental Assessment (SEA) Directive (2001/42/EC) (2001)

http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2001:197:0030:0037:EN:PDF

The Environmental Noise Directive (2002/49/EC) (2002)

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The Landscape Convention 20 October 2000 (ratified by UK in November 2006)

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Renewed EU Sustainable Development Strategy (June 2006)

http://register.consilium.europa.eu/pdf/en/06/st10/st10917.en06.pdf

Our life insurance, our natural capital: an EU biodiversity strategy to 2020, European Commission (2011) http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/2020/1\_EN\_ACT\_part1\_v7%5B1%5D.pdf

#### **NATIONAL**

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Historic Buildings and Ancient Monuments Act 1953

http://www.legislation.gov.uk/ukpga/Eliz2/1-2/49/contents

Ancient Monuments and Archaeological Areas Act 1979

www.legislation.gov.uk/ukpga/1979/46/pdfs/ukpga\_19790046\_en.pdf

The Wildlife and Countryside Act 1981 (as amended)

www.legislation.gov.uk/ukpga/1981/69

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended)

www.legislation.gov.uk/ukpga/1990/9/pdfs/ukpga\_19900009\_en.pdf

The Ancient Monuments (Class Consents) Order 1994 SI 1381

http://www.legislation.gov.uk/uksi/1994/1381/contents/made

Countryside and Rights of Way (CRoW) Act 2000

www.legislation.gov.uk/ukpga/2000/37/contents

Natural Environment & Rural Communities Act 2006

www.legislation.gov.uk/ukpga/2006/16/contents

Planning Act 2008

http://www.legislation.gov.uk/ukpga/2008/29/contents

Climate Change Act 2008

https://www.legislation.gov.uk/ukpga/2008/27/contents

Localism Act 2011

www.legislation.gov.uk/ukpga/2011/20/contents

The Conservation (Natural Habitats) Regulations 1994 (Habitats Regulation) as amended in 1997, 2000 (in England only) and 2017 (SI 1012)

https://www.legislation.gov.uk/uksi/2017/1012/contents/made

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**Environment Act 2021** 

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Levelling-up and Regeneration Act 2023 c. 55

https://www.legislation.gov.uk/ukpga/2023/55/section/245

Policies, Strategies and Plans

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environment/conservationprinciplespoliciesandguidanceapril08web.pdf

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Strategic Framework for Tourism in England 2010 – 2020 (Visit England 2011) www.visitengland.org/strategicframework/

'The Natural Choice', the Natural Environment White Paper (Defra 2012)

www.defra.gov.uk/environment/natural/whitepaper/

Healthy lives, healthy people: Improving outcomes and supporting transparency (DH 2012) www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH\_132358

GPA2 Managing Significance in Decision-Taking in the Historic Environment Historic England (2015) https://historicengland.org.uk/images-books/publications/gpa2-managing-significance-in-decision-taking/gpa2/

GPA3 The Setting of Heritage Assets Historic England (2017)

https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/

GP4: Enabling Development and the Conservation of Significant Places Historic England (2020) https://historicengland.org.uk/images-books/publications/gpa4-enabling-development-heritage-assets/heag294-gpa4-enabling-development-and-heritage-assets/

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https://assets.publishing.service.gov.uk/media/64a6d9c1c531eb000c64fffa/environmental-improvement-plan-2023.pdf

The Third National Adaptation Programme (NAP3) and the Fourth Strategy for Climate Adaptation Reporting, Defra July 2023

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South West river basin district river basin management plan, Environment Agency: updated 2022

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Thames river basin district river basin management plan, Environment Agency: updated 2022

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Severn River Basin District Flood Risk Management Plan 2021 to 2027, Environment Agency, December 2022

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Thames River Basin District Flood Risk Management Plan 2021 to 2027, Environment Agency, December 2022

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Cotswold Water Park Nature Recovery Plan: guiding new and ongoing nature recovery and biodiversity enhancement initiatives across the Cotswold Water Park, as part of our response to the global climate and ecological emergencies. 2021 and beyond, Cotswold Water Park Nature Conservation Forum <a href="https://www.cotswold.gov.uk/media/wwferfcb/cotswold-water-park-nature-recovery-plan.pdf">https://www.cotswold.gov.uk/media/wwferfcb/cotswold-water-park-nature-recovery-plan.pdf</a>

#### LOCAL

The NL lies within the areas of 15 local authorities, albeit for some the area is small. Each produces strategies and plans that cover a similar range of topics that affect the CNL. Many of the policies are similar. All will need to be taken into account during the SEA process but for simplicity, only a sample are listed below.

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Gloucestershire Waste Core Strategy 2012 -2027, Gloucestershire County Council (adopted 2012) https://www.gloucestershire.gov.uk/media/14056/adopted\_wcs\_211112-53886.pdf

Highways & Biodiversity Guidance for Gloucestershire, Gloucestershire County Council (2022) https://www.gloucestershire.gov.uk/media/19592/ghbg-v32-may2022.pdf

Gloucestershire's Local Transport Plan 2020-41 Gloucestershire County Council 2021 https://www.gloucestershire.gov.uk/media/2108466/ltp-policy-document-final-v132.pdf

Gloucestershire Local Industrial Strategy 2019 gfirstLEP (2019)

https://www.gfirstlep.com/downloads/2020/gloucestershire\_draft\_local-industrial-strategy\_2019-updated.pdf

Gloucestershire County Council is working with the Local Enterprise Partnership to develop a new economic strategy. The strategy will support the county's short-term economic priorities for the next five years and provide a long-term view to 2050. https://www.gloucestershire.gov.uk/council-and-democracy/grow-gloucestershire/developing-a-new-economic-strategy-for-gloucestershire/

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Gloucestershire Climate Change Strategy – Fourth Annual Report and Action Plan download https://glostext.gloucestershire.gov.uk/documents/s97267/For%20Cabinet%20-%20Annex%201%20Fourth%20Annual%20Report%20on%20Climate%20Change%20Action%20Plan.pdf

Gloucestershire County Council is preparing a Local Nature Recovery Strategy. A draft version of the LNRS is likely to be circulated for public consultation in 2024. The National Landscape Management Plan should seek to embed appropriate policies.

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Climate Action overview 2022-2023 Oxfordshire County Council 2023

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Oxfordshire County Council is preparing a Local Nature Recovery Strategy. A draft version of the LNRS is likely to be circulated for public consultation in 2024. The National Landscape Management Plan should seek to embed appropriate policies.

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The Joint Municipal Waste Management Strategy for Herefordshire and Worcestershire 2004 - 2034 (first review 2011)

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Worcestershire County Council, Green Infrastructure Strategy 2013-2018 (2013)

http://www.worcestershire.gov.uk/downloads/file/3780/worcestershire\_gi\_strategy\_document\_2013-2018

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#### **UNITARY COUNCILS**

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Wiltshire & Swindon Minerals Core Strategy Development Plan Document 2006 – 2026 (June 2009) http://www.wiltshire.gov.uk/minerals-core-strategy-june-2009.pdf

Wiltshire & Swindon Waste Core Strategy Development Plan Document (July 2009)

http://www.wiltshire.gov.uk/waste-core-strategy-2009-july.pdf

Wiltshire Council is preparing a Local Nature Recovery Strategy. A draft version of the LNRS is in production. The National Landscape Management Plan should seek to embed appropriate policies.

https://www.wiltshire.gov.uk/local-nature-recovery-strategy

South Gloucestershire Local Plan Core Strategy 2006 - 2027 (2013) – now developing a new plan – draft expected 2024

http://www.southglos.gov.uk/documents/cleanversionforinterimpublication2.pdf

Green Infrastructure Strategy 2021 Greener Places, South Gloucestershire Council

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Bath and North East Somerset Local Plan 2011 – 2029 Core Strategy (2014) and Place Making Plan (2017) – this is to be updated in 2025 with a full new plan to establish the planning framework for the district up to 2042.

http://www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/Placemaking-Plan/cs\_pmp\_vol\_1\_district-wide.pdf

Bath & North East Somerset Ecological Emergency Action Plan 2023-2030 (2023)

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#### **DISTRICT & BOROUGH COUNCILS**

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The Cherwell Local Plan 2011 – 2031 Part 1 Adopted 20 July 2015 (incorporating Policy Bicester 13 readopted on 19 December 2016) (July 2015) – a new plan is in preparation that will address needs up to 2040.

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West Oxfordshire Local Plan 2031 West Oxfordshire District Council (2018) ) – a new plan is in preparation that will address needs up to 2041.

https://www.westoxon.gov.uk/media/feyjmpen/local-plan.pdf

Stroud District Council Your District Your Future Stroud District Local Plan (2015)

https://www.stroud.gov.uk/media/1455/stroud-district-local-plan\_november-2015\_low-res\_for-web.pdf

## Appendix 3: Outline of future trends in the National Landscape

#### **Key Issues**

### The Climate Emergency

Climate change is happening, and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and Special Qualities of the Cotswolds National Landscape.

The habitats most susceptible to harm are the rivers and streams, heathland and wet woods.

Examples of the impacts include pest and diseases (ash dieback being a new and highly visible example); changing timings of seasons; low summer river flows; and damage to vegetation from high winds.

Cultural heritage assets may be at risk to extreme weather fluctuations including increasing temperatures (heatwaves or fires), precipitation and flooding, and from unintended consequences of climate mitigation and adaptation measures. Commercial renewable energy development has the potential to result in direct and indirect physical impacts on the historic environment that can impact on its significance. Direct physical impacts include impacts on surface features or buried archaeological remains; indirect physical impacts include those which occur offsite, such as impacts to groundwater levels.

#### Outcomes without mitigating actions

Energy supply requires more low carbon energy technologies, buildings need to become energy efficient, and infrastructure needs to be more resilient. Innovative solutions may lead to an erosion of vernacular design features that add to the special qualities of the National Landscape. Changes in climate may have a significant impact on the area's internationally important beech woodlands. There may be a loss of nationally important mixed/oak woods and trees within

Drought conditions may cause stress on trees making them less resilient to storm events. There may be an increased risk of uprooting and increased fire risk.

parks through 'sudden oak death' and increased

stress on veteran trees.

Drier warmer summers may lead to a parched landscape of bleached grassland, 'thin' arable crops and wilting trees and hedges.

Warmer winters could promote increased tree growth, as well as the suitability of new non-native species or native species of a different provenance.

Other semi-natural habitats may deteriorate, including of unimproved limestone grassland with the spread of invasive species and a reduction in species diversity. Grasslands flowers may produce less or no nectar in response to drought.

Climate change may result in the migration of new species moving north. This could see species diversity maintained but there is a risk of new plant and animal pests and diseases. These may have a harmful impact on landscape, biodiversity and the economy.

Droughts may cause rivers, lakes and streams to dry up, which will affect wildlife, agriculture and tourism. There is the risk of reduced nectar production in response to drought in grassland wildflowers.

Heavier rainfall may lead to an increase in surface water flooding and soil erosion. Without adaptation to farming practices, there may be a decline in soil quality/nutrient levels, soil loss to erosion, release of carbon from soils and timber, a reduction in water quality and increased flooding.

A longer growing season with increasing temperatures may encourage the expansion of arable production, putting more easily cultivated areas of pasture under pressure. Higher temperatures may also encourage the introduction of new crops into the landscape, as well as different crop timings. This may impact on the special qualities of the National Landscape.

A longer growing season could see an increase in timber and biomass production that will increase carbon capture and support nature recovery.

Unplanned or controlled mitigation actions could negatively impact on the special qualities. Examples include the loss of characteristic habitats with the conversion to new biomass crops for energy production and greater tree planting.

Buried archaeological remains on land can be damaged or even destroyed by operations such as:

- intrusive ground investigation and engineering operations
- landscaping
- off-site works, such as those related to highways

# Nature's decline and the Ecological Crisis

Wildlife loss is well documented and understood. Climate change is threatening the loss of already diminished wildlife at an even greater scale and pace. There is a need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. The need for action is urgent to avoid a mass extinction event.

Habitats will remain isolated with no 'corridors' to allow species to adjust naturally to climate change by moving northwards to a new climate space or find a new ecological niche. Some populations will become too small to remain viable and species will be unable to adapt by adjusting to new climatic conditions without large and varied sites.

Chalara ash die back will have a considerable effect upon the area's habitats, landscape character and landscape integrity. Individual hedge-row trees are important in the Cotswolds dip slope landscape, many of which are ash and vulnerable to ash dieback. Their loss could have a significant impact on this landscape setting.

Invasive non-native species currently include Himalayan balsam and New Zealand Pygmy Weed in rivers and ponds, and Holm oak and cotoneaster on species rich grassland. Biodiversity will reduce if their spread is not checked.

Degraded ecosystems will not deliver benefits to people (ecosystem services). These services are critically important to the wellbeing and economy of people living in and around the Cotswolds. For example, they deliver good quality water and food, spiritual refreshment and a sense of history and cultural heritage.

### Health and well-being

Connections within the National Landscape and with its setting are important. The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The COVID-19 pandemic has had a significant impact on human behaviour. For example, people have travelled less and many have worked from home. People are more aware of the importance of green and blue spaces.

People will not feel welcome and currently underrepresented groups will be unable to enjoy the benefits of accessing natural beauty.

People who cease visiting heritage sites will experience a decline in physical health, mental health and life satisfaction.

The bond between people and place will break down due to a reduced functional relationship. Communities will lose their links to the land and will not benefit from a natural environment that brings economic benefits and supports livelihoods. Some connections are understood but others will need strengthening.

- The link between personal consumption patterns and land-use.
- Between choices relating to private property, nature and other public goods (hard surfacing, boundaries, outdoor lighting)

# Appendix 4: SEA Objectives and baseline data

N°	Environmental	Will the plan help to?	Headline indicators (27)
	Objectives		
E1	Climate change	<ul> <li>reduce greenhouse gas emissions</li> <li>.</li> </ul>	Level of greenhouse gas     emissions within Protected     Landscapes (PLTOE TLA)
	Address the causes and consequences of climate change	<ul> <li>increase greenhouse gas capture and storage through land management</li> <li>increase cycling and walking</li> <li>maximise the role of soil as a carbon store</li> <li>increase recycling</li> <li>increase the renewable energy capacity</li> <li>ensure tourism is compatible with the climate change agenda</li> <li>improve energy efficiency whilst maintaining local character</li> <li>improve public transport</li> <li>deliver a more sustainable pattern of transport</li> <li>ensure that land management practices adapt to climate</li> </ul>	Landscapes (PLTOF TI 6)  2. Carbon stored by habitats  3. Extent of tree canopy and woodland cover in Protected Landscapes (PLTOF TI 8)  4. Climate change adaptation plan in place
		<ul><li>change</li><li>reuse the existing building stock</li></ul>	
E2	Soils, Air and Water	<ul> <li>reduce soil compaction</li> <li>reduce leaching of nutrients and organic matter</li> <li>prevent soil erosion</li> <li>increase soil organic matter and carbon storage</li> <li>avoid soil sealing, prevent soil contamination, improve water quality</li> <li>maintain and enhance air quality</li> <li>meet national air quality standards</li> <li>promote sustainable water resource management</li> <li>encourage a catchment-based approach to addressing water issues</li> <li>maintain natural river geomorphologies</li> </ul>	<ul> <li>5. WFD quality of the water environment data (PLTOF AS 5)</li> <li>6. Area at risk from flooding (Environment Agency)</li> </ul>

E3	Protect and enhance biodiversity habitats	<ul> <li>reduce nutrient-rich run-off</li> <li>protect drinking water</li> <li>manage flood risk</li> <li>increase use of sustainable drainage systems</li> <li>improve efficiency in use of water</li> <li>prevent loss of key species</li> <li>prevent loss of habitat</li> </ul>	7.	Extent of wildlife rich habitat created or restored outside of
	and species	<ul> <li>Increase area and connectivity of habitat</li> <li>improve management, linkage and condition of designated and undesignated habitats</li> <li>maintain integrity of current ecological networks</li> <li>create opportunities to enhance biodiversity</li> <li>safeguard options for future habitat connectivity</li> <li>prevent pollution</li> <li>maintain and enhance access to sites whilst avoiding and reducing adverse impacts</li> <li>support agricultural activities whilst avoiding and reducing adverse impacts</li> </ul>	8. 9.	protected sites (PLTOF TI 1)  Percentage of SSSIs in favourable condition (PLTOF TI 2)  Percentage of SSSIs assessed as having 'actions on track' to achieve favourable condition (PLTOF TI 3)  Extent of priority habitat, outside of protected sites, in favourable management through agri-environment schemes (PLTOF TI 4)  Percentage of land managers adopting nature friendly farming on a percentage of their land (PLTOF TI 5)
E4	Protect and enhance the landscape	<ul> <li>conserve and enhance visual amenity</li> <li>conserve and enhance landscape character</li> <li>conserve and enhance townscape character</li> <li>conserve geodiversity</li> <li>avoid the loss of the best and most versatile agricultural land</li> <li>ensure the sustainable use of mineral resources including the use of recycled and secondary aggregates</li> </ul>	12.	National Character Areas which contain Protected Landscape(s), where changes to landscape and waterscape character is assessed as improving / no change / declining (PLTOF SA 10)  Number of geological and geomorphological SSSI unit features and % in favourable or recovering condition (PLTOF SA 1%)
E5	Sustain and enhance cultural heritage, including heritage assets and their settings	<ul> <li>conserve and enhance heritage assets including unknown archaeology; cultural and intangible heritage</li> <li>reduce the risk to heritage</li> <li>improve access to, and enjoyment of historic places</li> </ul>	14.	Number and percentage of nationally designated heritage assets in Protected Landscapes to be deemed at risk (PLTOF TI 10)

	T		
E6	Local Distinctiveness	<ul> <li>ensure any new developments or redevelopments are in keeping with local character</li> <li>take account of the natural and cultural environment in design and construction</li> </ul>	<ul> <li>15. Number of the area's defined special qualities monitored</li> <li>16. Number of planning authorities with vernacular design guidance mentioning the Cotswolds</li> <li>17. % of development decisions against Board advice</li> </ul>
E7	Safeguard and enhance human health	<ul> <li>reduce and avoid noise pollution</li> <li>reduce and avoid light pollution</li> <li>avoid impacts on the quality and extent of existing green infrastructure as a recreational asset</li> <li>support the provision of affordable housing</li> <li>improve access to services</li> <li>improve access to employment</li> <li>improve access for outdoor recreation</li> <li>retain and enhance sustainable transport to and from market towns</li> <li>promote art, craft and cultural interests</li> <li>improve safety</li> </ul>	<ol> <li>Light pollution maps</li> <li>Road noise maps and traffic data from DfT monitoring points</li> <li>Metres of accessible path as a % of total path (PLTOF TI 9a)</li> <li>Number of disability accessible parking spaces (PLTOF TI 9c)</li> <li>Number of accessible gates and gaps (PLTOF TI 9d)</li> <li>Number of accessible or easy access routes for which wayfinding has been created or improved PLTOF TI 9h)</li> <li>Deprivation statistics (PLTOF AS 23)</li> <li>Housing affordability (PLTOF AS 21)</li> </ol>
E8	To support a locally embedded economy	<ul> <li>avoid the loss of local jobs and local services</li> <li>promote economic activity that adds value to local products and helps support the conservation of the area's special qualities</li> <li>increase availability of locally sourced food</li> <li>support the long-term viability of commercial activities, including agriculture and sustainable tourism</li> <li>promote a career in land-based and traditional building skills</li> <li>encourage apprenticeships and training, especially where this supports traditional craft skills</li> </ul>	<ol> <li>Number of visitors</li> <li>Number of local units of registered businesses by industry type (PLTOF AS 22)</li> </ol>

E9	Cumulative Impacts	<ul> <li>promote the importance of environmental services</li> </ul>	No indicator but monitored through annual reporting
	Avoid significant adverse effects between the above interrelationships	<ul> <li>moderate the interaction between natural, social and economic actions</li> <li>in combination with another policy, does it prejudice the achievement of any of the SEA Objectives</li> </ul>	

# Appendix 5: Commentary on interactions between the Management Plan and SEA objectives

Mana	agement Plan Policies	Interaction with the SEA Objectives (in Appendix 4)
CROS	S CUTTING AIM: Tacklii	ng 21st century issues through progressive partnerships.
CC1	Climate Change – Mitigation	A comprehensive policy setting out a clear approach to the issues. There are strong relationships with climate change (E1) by reducing greenhouse gas emissions and soil management (E2) though carbon sequestration. As climate change is the subject of a nationally reported target, cumulative impacts (E9) is given strong support. and monitoring cumulative effects (E9). It has good relationships with all the other SEA Objectives.
CC2	Climate Change - Adaptation	This policy calls for adaptation measures but does not specify what they are. It has strong relationships with climate change (E1) and it signposts the sources of effective actions in other policy documents (in line with Natural England's advice). This includes the management plan policies CE8 (Nature Recovery & Biodiversity), CE10 (Farming & Land Management), and CE13 (Development & Transport – Principles). These link to soils, air and water (E2), biodiversity (E3) and the local economy (E4). Following a precautionary principle, all other relationships are presumed positive but uncertain, as the strategies are still in preparation. There are likely to be strong relationships with the SEA Objectives once published.
CC3	Compliance with section 85 of the CRoW Act	A policy that has good links to those SEA Objectives associated closely with the purposes of NL designation – biodiversity (E3), landscape (E4), heritage (E5) and local distinctiveness (E6). Section 85 compliance implies a mitigation of cumulative impacts (E9).
CC4	Working in partnership	A policy that has good links to those SEA Objectives associated closely with the purposes of NL designation – biodiversity (E3), landscape (E4), heritage (E5) and local distinctiveness (E6). It also references human health (E7) and the local economy (E8). Partnership working implies a strong relationship with cumulative impacts (E9) as it will moderate the interaction between natural, social and economic actions and any unintended consequences will be known.
CONS	ERVE & ENHANCE AIM	: Influencing and delivering for landscape, nature and climate
CE1	Landscape	A policy that has links to those SEA Objectives associated closely with the purposes of NL designation; they are strong for landscape (E4) and local distinctiveness (E6) and good for biodiversity (E3) and heritage (E5). The policy will conserve and enhance visual amenity, landscape character and townscape character. It also references the local economy (E8) by promoting a career in land-based and traditional building skills, and encouraging apprenticeships and training, especially where this supports traditional craft skills. Landscape change will be monitored, which implies a positive relationship with cumulative impacts (E9) as unintended consequences of actions will be reported.
CE2	Geology & Geomorphology	This policy has a strong relationship with landscape (E4) by conserving geodiversity and, as framed, slightly weaker relations hips with biodiversity (E3) and local distinctiveness (E6). There may be links with cultural heritage (E5) but this is uncertain. The support for further research will help reduce cumulative impacts.

CE3	Natural & Cultural Capital – Principles	A policy that has good links to all the SEA Objectives; these links are particularly strong for biodiversity (E3), cultural heritage (E5), and local distinctiveness (E6). The call for natural and cultural accounting ties tightly with minimising cumulative impacts (E9) by promoting the importance of environmental services.
CE4	Local Distinctiveness	This policy has a strong relationship with landscape (E4) through the conservation and enhancement of visual amenity and townscape character, cultural heritage (E5), and local distinctiveness (E6) by enhancing heritage assets. It also supports good design in buildings that will benefit human health (E7) and the local economy (E8). The development of design guidance should minimise cumulative impacts (E9).
CE5	Tranquillity	The policy has a strong relationship with human health (E7) by minimising noise and other aural and visual disturbance. This will also support biodiversity (E3) by reducing disturbance and landscape (E4) will be better appreciated. It is not clear what monitoring is to take place but compatibility with the tranquillity position statement will offer some support to managing any cumulative impacts (E9).
CE6	Dark Skies	The policy has a strong relationship with human health (E7) by reducing light pollution and landscape (E4) by enhancing visual amenity at night. This will also support biodiversity (E3) by reducing disturbance to roosting and feed flights, and will support the local economy (E8) through star-gazing tourism. There could be benefits for climate change (E1) if less power is used and steps to secure a formal dark sky status will necessitate the monitoring of cumulative impacts (E9).
CE7	Historic Environment & Cultural Heritage	The policy has a strong relationship cultural heritage (E5) through the conservation and enhancement of visual amenity and townscape character, cultural heritage (E5), and local distinctiveness (E6) by enhancing heritage assets and reducing the risk to heritage. As heritage is the subject of a nationally reported target, the cumulative impacts (E9) objective is given strong support. There is support for landscape (E4) and the promotion of cultural interests offers good support to human health (E7). The local economy (E8) will benefit from cultural tourism and craft skill training.
CE8	Nature Recovery & Biodiversity	Strong support is given to soils (E2), biodiversity (E3), landscape (E4) and local distinctiveness (E6). As nature recovery is the subject of a nationally reported target, the cumulative impacts (E9) objective is given strong support. The policy promotes the importance of environmental services and will moderate the interaction between natural, social and economic actions. The policy will also impact on carbon storage and greenhouse gas release so there are good links to climate change (E1).
CE9	Water	There are strong links to soil and water (E2), biodiversity (E3), and improving human health (E7) through the restoration of river and wetland habitats, intercepting runoff from roads and the filtering of polluted wate. Minimising soil erosion and run off will be achieved by implementing soil conservation measures. Minimising pesticide and artificial fertiliser use and implementing measures to reduce pollution from agriculture will make for healthier lives. The creation of new habitats and better soil management will help manage climate change (E1) and re-naturalising water courses will have landscape

		benefits (E4). Citizen science projects monitoring water quality will help to minimise cumulative impacts (E9).
CE10	Farming & Land Management	The policy will support the local economy (E8) by promoting economic activity that adds value to local products and helps support the conservation of the area's special qualities, and increasing the availability of locally sourced food. The policy will offer some support to most of the SEA Objectives (except for human health). That support is not clear for cultural heritage (E5) and local distinctiveness (E6). The policy will promote the importance of environmental services. Though support and guidance are proposed, it is not clear what monitoring of the impacts (E9) will be delivered.
CE11	Problem Species, Pests & Diseases	The policy will help maintain integrity of current ecological networks so giving strong support to biodiversity (E3). Water quality (E2) and landscape character (E4) will gain some support. The policy will moderate the interaction between natural, social and economic actions and so offer some support to cumulative impacts (E9). It is possible that local distinctiveness (E6) and human health (E7) will gain benefits but this is uncertain.
CE12	Soils	By increasing organic content, water retention and carbon sequestration, and by minimising erosion, water pollution and compaction, the policy supports climate change (E1) and soils (E2). Biodiversity (E3) gains support through opportunities to enhance biodiversity and the prevention of pollution. Good soil management will support the long-term viability of agriculture, so supporting the local economy (E8).
CE13	Development & Transport - Principles	The call to reflect and enhance the character of the local area gives strong support to landscape (E4) and local distinctiveness (E6). Improving the provision of services and employment supports human health (E7) and the local economy (E8). There are links to climate change (E1), biodiversity (E3) and cultural heritage (E5). Assessing cumulative impacts of development proposals and adopting a landscape-led approach that seeks to avoid adverse effects will moderate the interaction between natural, social and economic actions. This supports the cumulative impacts (E9) objective.
CE14	Major Development	Taking account of the natural and cultural environment will offer strong support local distinctiveness (E6). The policy will conserve and enhance visual amenity, landscape character and townscape character in support of landscape (E4). Rigorously applying and documenting mandatory major development 'tests' for all major allocations and development proposals will moderate the interaction between natural, social and economic actions and achieve the cumulative impacts (E9) objective.
CE15	Development Priorities & Evidence of Need	Focusing on meeting affordable housing requirements and prioritising the maintenance of, and access to, local community amenities and services, offers strong support to SEA Objective (E7) human health. And the prioritisation of delivering local employment opportunities supports the local economy (E8).
CE16	Waste Management & the Circular Economy	The policy supports climate change (E1) and landscape (E4) by advocating the prevention of waste and encouraging recycling. The management or use of waste will only be in very limited circumstances within environmental limits and where it can be demonstrated that there is a significant net-benefit for the

		conservation and enhancement of the natural beauty. This lends some support to the cumulative impacts (E9) objective that seeks to avoid adverse effects between each of the SEA Objectives.
	EASING UNDERSTAND tunities are for everyon	ING & ENJOYMENT AIM: Ensuring access, learning and wellbeing e.
UE1	Health &Well-being	Strong support is given to human health (E7) by avoiding impacts on the quality and extent of existing green infrastructure as a recreational asset while improving access for outdoor recreation. Climate change (E1) is supported through increasing cycling and walking whilst improving public transport. Improving access to, and enjoyment of historic places will support cultural heritage (E5). Biodiversity (E3) gains by supporting young people with the opportunity to experience the area through direct contact with the natural environment.
UE2	Access & Recreation	Climate change (E1) is supported through increasing cycling and walking whilst human health (E7) gains through improving access for outdoor recreation. The policy calls for arts and cultural experiences to be provided to encourage people to deepen their emotional connection to the landscape and support the engagement of new and existing audiences, supporting both human health (E7) and cultural heritage (E6). Giving opportunities for people to increase their understanding and enjoyment of the special qualities of the area will also support biodiversity (E3) and landscape (E4). As access and recreation is the subject of a nationally reported target, the cumulative impacts (E9) objective is given strong support. This is strengthened by the promotion of the Countryside Code that seeks to avoid significant adverse effects.
UE3	Sustainable Tourism	The policy seeks to deliver tourism in a way that is compatible with and seeks to further the conservation and enhancement of the natural beauty of the area and minimises the emission of greenhouse gases. It advocates sustainable and integrated transport initiatives to help facilitate the car free visitor experience. It encourages people to support projects that conserve habitats and species, look after heritage and landscape, improve access, and help provide education resources encouraging people to understand the landscape and nature better. This gives strong support to climate change (E1), biodiversity (E3) and landscape (E4). The policy supports economic activity that adds value to local products and helps support the conservation of the area's special qualities, in lone with local economy (E8).

# Appendix 6: Review of alternative policies

## Table 1: The Climate Emergency

Climate change is happening and its impacts are unavoidable. There is already experience of the impacts of a rapidly heating climate and this threatens many of the defining characteristics and special qualities of the Cotswolds National Landscape.

The habitats most susceptible to harm are the rivers and streams, heathland and wet woods. Examples of the impacts include pest and diseases (ash dieback being a new and highly visible example); changing timings of seasons; low summer river flows; and damage to vegetation from high winds.

Cultural heritage assets may be at risk to extreme weather fluctuations including increasing temperatures (heatwaves or fires), precipitation and flooding, and from unintended consequences of climate mitigation and adaptation measures. Commercial renewable energy development has the potential to result in direct and indirect physical impacts on the historic environment that can impact on its significance. Direct physical impacts include impacts on surface features or buried archaeological remains; indirect physical impacts include those which occur offsite, such as impacts to aroundwater levels.

	10 groundwarer levels.				
	Management Plan outcomes	agement Plan outcomes  Benefits of the proposed outcome policies			
1.	Climate action: We are on target to achieve net zero (or better) within the Cotswolds National Landscape by 2050 (or sooner), as a result of stakeholders implementing a clearly defined pathway to net zero, whilst also adapting to the consequences of climate change.	Most of the policy statements are aspirations intended to encourage others to act. It sets out a comprehensive list of principles, topic areas and actions that, if followed through, would have a significant impact on the local factors affecting the climate. There is signposting to detailed studies that would inform decision making. It may provide material to support policy decisions.	Other agencies will develop mitigation strategies but may not also seek to conserve and enhance the national landscape. The local authorities will each develop Climate Adaptation plans.  This may lead to a less coherent approach across the Cotswolds with a lack of coordination across the area.  The management plan offers a more certain approach.		
2.	Working together: Through collaborative partnerships and a shared understanding, the purposes of the Cotswolds National Landscape and its Board are applied consistently across the whole area.	A general statement about collaboration and duties. The policy focuses on securing the purposes of designation and their review. There may be a benefit as the management plan identifies climate change as a key issue; this is likely to be a subject for networking.	Minimal, as local authorities and third sector bodies create and support a series of networks, some of which consider climate change.		

3.	Landscape: The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.	The policies focus on landscape character, geological and geomorphological features, and natural and cultural capital. Application of the natural and cultural capital principles will consider the implications of climate change within investment, development and management decisions that affect the Cotswold.	Bodies at a national level may take a similar approach but this is not certain. And it is not certain that stakeholders will adopt this management plan policy.  There may be a marginally more proactive approach with the plan in place.
4.	Local distinctiveness: In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.	Neutral	Neutral
5.	Tranquillity: Noise pollution and visual disturbance are minimised to maintain tranquillity across the Cotswolds National Landscape.	Neutral	Neutral
6.	Dark skies: Fewer areas of the Cotswolds National Landscape are affected by light at night.	Neutral	Neutral
7.	Historic environment and cultural heritage: The historic environment and cultural heritage of the Cotswolds National Landscape is better understood, conserved and enhanced.	Several impacts of climate change on cultural heritage are identified in the management plan. The policy calls for proposals that are likely to impact on the historic environment and cultural heritage of the Cotswolds should be delivered in a way that is compatible with and seek to further the conservation and enhancement of these heritage assets and their setting. It advocated the use of Heritage and Cultural Heritage Impact Assessments.	The policy is describing 'good practice' advice to third parties. Historic England and the local authorities will already be aware of these approaches. They will each develop climate change management strategies for their heritage assets.  This may lead to a lack of coordination across the area.  There may be a marginally more proactive approach with the plan in place.

8. Nature recovery and biodiversity: There is concerted unified action for a widespread recovery of nature – conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.

The policy seeks conserve and enhance biodiversity by establishing a coherent and resilient nature recovery network across the national landscape and in its setting. One affect of this will be to mitigate some effects of climate change.

Each local authority is required to develop and implement a statutory nature recovery strategy. Though this may lead to a lack of coordination across the area, this will not reduce the effects on climate change mitigation. There may be a marginally more proactive approach with the plan in place.

The water environment:
 Watercourses and bodies of
 water within the Cotswolds
 National Landscape have
 good ecological and
 chemical status.

The management plan identifies rivers and streams, heathland and wet woods as the habitats most susceptible to harm from climate change.

Among other things, the policy calls for water resources to be managed and conserved to:

- improve water quality;
- ensure adequate aquifer recharge; ensure adequate river flows; and
- contribute to natural flood management systems.

It presents a comprehensive range of management strategies that third parties can apply. Water management is the responsibility of the Environment Agency, the local authorities and the water companies. The management plan can only offer advice and it is not presenting any innovative approaches; stakeholders will be aware of the options set out in the plan but may not be willing t adopt them. There may be a

There may be a marginally more proactive approach with the plan in place.

10.	Farming and land management: Farming and land management conserves and enhances the natural beauty of the Cotswolds National Landscape in ways which balance the needs of recovering nature, climate action, food production, supporting livelihoods and public access.	Farming and land management produces greenhouse gas emissions. The policy calls for farmers and land managers to have access to clear and consistent advice, guidance and support on a range of topics, including the pathway to net-zero and climate change strategies. The Board connects well with land managers and their businesses and its advice is trusted.	Government agencies, local authorities and NGOs are well able to advise local farmers and land managers on strategies for reducing the effects of climate change. And they may have access to resources that will influence the actions of land managers. But they may not have the staff and networks to meet as many of the local stakeholders as the Board can.  There may be a marginally more proactive approach
11.	Development and transport: Development and transport	The management plan does not create planning and transport policy but it is a	with the plan in place.  The local authorities are the planning,
	schemes positively contribute to the purpose of national landscape designation and also play a key role in facilitating the economic and social wellbeing of local and rural communities.	material consideration. The plan sets out a comprehensive approach to good practice and it advocates a landscapeled approach. Such an approach could have a significant impact on managing climate change effects.	mineral, waste and highway authorities. Their plans are the statutory documents and they are required to develop climate policies. However, many of these plans have not been reviewed for some time and effective climate policies may not yet be in place.  As a material consideration, these authorities can use the management plan to support their decision making. There may be a more proactive approach with the plan in place.
12.	Health and wellbeing: The Cotswolds National Landscape plays a full part in improving the nation's health, benefitting the mental	The plan encourages walking, cycling and riding and may reduce the use of motor vehicles; such an outcome would reduce impacts on climate.	Natural England, local authorities and third sector bodies may undertake such initiatives.
	and physical wellbeing of those who experience it.		However, there may not be the area-wide

13. Access and recreation: The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.		focus and opportunities may be lost. The management plan offers a more certain approach.
14. Sustainable tourism: Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape	The management plan offers a limited impact by including the aspiration to reduce air travel. This will be by promoting messages aimed at minimising air travel by Cotswolds residents.	DCMS, its agencies, and the local authorities have policies that could minimise the impact of tourism on the climate.  There is unlikely to be any materially different effects.

There are many organisations that have the opportunity, authority and resources to take meaningful actions. However, the proposed polices offer advantages over the do-nothing option as they support an area-wide approach. Others will also take this initiative but without coordination, opportunities may be lost. The management plan offers a more certain approach.

### Table 2: Nature's decline and the Ecological Crisis

Wildlife loss is well documented and understood. Climate change is threatening the loss of already diminished wildlife at an even greater scale and pace. There is a need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. The need for action is urgent to avoid a mass extinction event.

	Management Plan outcomes	Benefits of the proposed outcome policies	Do nothing situation	
1.	Climate action: We are on target to achieve net zero (or better) within the Cotswolds National Landscape by 2050 (or sooner), as a result of stakeholders implementing a clearly defined pathway to net zero, whilst also adapting to the consequences of climate change.	Initiatives to save energy and reduce carbon emissions will slow the decline of nature. However, most of the policy statements are aspirations intended to encourage others to act.	Minimal, as HM Government and the local authorities have policies that achieve the same outcome. Third sector bodies advocate similar approaches. There is unlikely to be any materially different effects.	

			1
2.	Working together: Through collaborative partnerships and a shared understanding, the purposes of the Cotswolds National Landscape and its Board are applied consistently across the whole area.	As framed, the policy focuses on securing the purposes of designation and their review. There may be a benefit as the management plan identifies the ecological crisis as a key issue; this is likely to be a subject for networking.	Natural England is developing strategies to lead on nature recovery but will need active local partners.  The local authorities and third sector bodies create and support a series of networks, some of which consider nature recovery. It is not certain if these will cross county boundaries.  There may be a more proactive approach with the plan in place.
3.	Landscape: The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.	Maintaining landscape character will have the effect of supporting natural habitats, as, to a lesser extent, will the support for traditional rural skills.  Initiatives to assess and evaluate natural capital will help justify the development of nature recovery initiatives.	Natural England, local authorities and third sector bodies may undertake such initiatives.  However, there may not be the area-wide focus and opportunities may be lost.  There may be a more proactive approach with the plan in place.
4.	Local distinctiveness: In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.	Neutral	Neutral
5.	Tranquillity: Noise pollution and visual disturbance are minimised to maintain tranquillity across the Cotswolds National Landscape.	Cutting sources of noise pollution and other aural and visual disturbance will offer some help to fauna.	Securing tranquillity will be less of a priority for other bodies. The management plan offers a more certain approach.
6.	Dark skies: Fewer areas of the Cotswolds National Landscape are affected by light at night.	Increasing the area of dark skies and cutting existing sources of light pollution will benefit fauna, especially bats.	Securing Dark Sky status will be less of a priority for other bodies. The management plan offers a more certain approach.

7.	Historic environment and cultural heritage: The historic environment and cultural heritage of the Cotswolds National Landscape is better understood, conserved and enhanced.	Neutral	Neutral
8.	Nature recovery and biodiversity: There is concerted unified action for a widespread recovery of nature – conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.	Most of the policy statements are aspirations intended to encourage others to act. However, it offers strong support for nature recovery.	Natural England or other bodies may develop similar initiatives but opportunities may be missed.  There is unlikely to be any materially different effects.
9.	The water environment: Watercourses and bodies of water within the Cotswolds National Landscape have good ecological and chemical status.	Supporting natural flood management systems and reducing pollution from storm overflows will support nature recovery.	Defra, its agencies, and the local authorities have policies that achieve the same outcome.  There is unlikely to be any materially different effects.
10.	Farming and land management: Farming and land management conserves and enhances the natural beauty of the Cotswolds National Landscape in ways which balance the needs of recovering nature, climate action, food production, supporting livelihoods and public access.	Though the policy is not focused on nature recovery, the policy does highlight the Cotswolds Nature Recovery Plan and seeks to deliver public goods and service, which will include biodiversity; and it will help to control invasive non-native species and so help maintain the resilience of ecosystems.  The policy seeks to halt soil degradation. Soil is an important component of the natural environment. Degraded soil is detrimental to commercial use but may be beneficial for wildlife. Nutrient rich soils favour vigorous species. But the retention of carbon helps reduce greenhouse gas emissions and this will benefit nature.  The impacts are mixed.	Defra, its agencies, and the local authorities have policies that achieve the same outcome. Third sector bodies advocate similar approaches. There may be a marginally more proactive approach with the plan in place.

11.	Development and transport: Development and transport schemes positively contribute to the purpose of national landscape designation and also play a key role in facilitating the economic and social wellbeing of local and rural communities.	Most of the policy statements are aspirations intended to encourage others to act. However, it offers strong support for a landscape-led approach. Landscape scale initiatives are essential for the development of nature recovery networks.	The local authorities are the planning, mineral, waste and highway authorities. Their plans are the statutory documents and they are required to develop biodiversity policies. However, many of these plans have not been reviewed for some time and effective biodiversity policies may not yet be in place. The local authorities have only just started to prepare nature recovery strategies.  As a material consideration, these authorities can use the management plan to support their decision making. There may be a more proactive approach with the plan in place.
12.	Health and wellbeing: The Cotswolds National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.	The policy seeks to provide environmental education opportunities to experience the Cotswolds National Landscape through direct contact with the natural environment. This could generate support for nature recovery actions in the future.	The local authorities and third sector bodies will have similar initiatives.  There may be a marginally more proactive approach with the plan in place.
13.	Access and recreation: The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.	The policy expects improvements to access and recreation provision to be undertaken in a way that furthers the conservation and enhancement of the natural beauty of the area. It also sets out the 'Sandford Principle' whereby if there is a conflict between the conservation and enhancement of natural beauty and public enjoyment of this natural beauty, the conservation and enhancement of natural beauty should be given greater weight. Promotion of the countryside code may deliver benefits for nature.	The local authorities and third sector bodies will have similar initiatives. The local authorities may be less willing to apply the Sandford Principle.  There may be a marginally more proactive approach with the plan in place.

14. Sustainable tourism:

Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape

The policy offers significant benefits to nature through the reduction in greenhouse gases and the promotion of the 'Caring for the Cotswolds' scheme. A specific target is the conservation of habitats and species.

Natural England or other bodies may promote similar initiatives. However, they may not coordinate the 'Caring for the Cotswolds' initiative.

The management plan offers a more certain approach.

There are many organisations that have the opportunity, authority and resources to take meaningful actions. Some of the proposed polices offer limited advantages over the do-nothing option, generally as they support an area-wide approach. Others will also act but without coordination, opportunities may be lost. Several management plan policies support the actions of others rather than adding extra initiatives. Actions, like volunteering and green prescribing, will only happen with active support from the management plan. The management plan offers a more certain approach.

### Table 3: Health and well-being

Connections within the National Landscape and with its setting are important. The mental and physical health benefits of accessing natural beauty are becoming increasingly understood and appreciated. The COVID-19 pandemic has had a significant impact on human behaviour. For example, people have travelled less and many have worked from home. People are more aware of the importance of green and blue spaces.

	Management Plan outcomes	Benefits of the proposed outcome policies	Do nothing situation	
1.	Climate action: We are on target to achieve net zero (or better) within the Cotswolds National Landscape by 2050 (or sooner), as a result of stakeholders implementing a clearly defined pathway to net zero, whilst also adapting to the consequences of climate change.	The policy does encourage building practices that make homes warmer and encourages households to grow vegetables. These will have health benefits.	The local authorities will have policies on energy use but they may not encourage horticulture.  There may be a marginally more proactive approach with the plan in place.	
2	Working together: Through collaborative partnerships and a shared understanding, the purposes of the Cotswolds National Landscape and its Board are applied consistently across the whole area.	Encouraging people to value and celebrate being part of a nationally recognised landscape and increasing the understanding and enjoyment of its special qualities will make people feel better in themselves. The policy also reminds stakeholders to foster the economic and social well-being of communities.	Health bodies, local authorities and third sector bodies create and support a series of networks, some of which consider green proscribing but the application is ad-hoc.  There may be a more proactive approach with the plan in place.	

3.	Landscape: The evolving landscape and much-loved character of the Cotswolds is better understood and at the heart of all we do and the decisions we make.	Neutral	Neutral
4.	Local distinctiveness: In a world of constant and rapid change, the local distinctiveness of the National Landscape is valued, conserved and enhanced.	Neutral	Neutral
5.	Tranquillity: Noise pollution and visual disturbance are minimised to maintain tranquillity across the Cotswolds National Landscape.	Cutting sources of noise pollution and other aural and visual disturbance may increase the health benefits from a visit in the area.	Securing tranquillity will be less of a priority for other bodies.  The management plan offers a more certain approach.
6.	Dark skies: Fewer areas of the Cotswolds National Landscape are affected by light at night.	Increasing the area of dark skies and cutting existing sources of light pollution may help people enjoy the wonders of the night sky; though the lack of lighting may make people feel unsafe at night.  Mixed impacts.	Securing Dark Sky status will be less of a priority for other bodies. The management plan offers a more certain approach.
7.	Historic environment and cultural heritage: The historic environment and cultural heritage of the Cotswolds National Landscape is better understood, conserved and enhanced.	The focus of the policy is to secure the proper management of heritage assets. There is no mention of access to or interpretation of these assets. Health benefits, though significant, will be tangential to the application of the policy.	Historic England and third sector bodies will promote access opportunities, which will have an effect of improving people's health.  There is unlikely to be any materially different effects.
8.	Nature recovery and biodiversity: There is concerted unified action for a widespread recovery of nature – conserving, restoring and enhancing a connected mosaic of distinctly Cotswolds habitats and species.	The policy will help secure nature recovery but there is no mention of access to or interpretation of nature. Health benefits, though significant, will be tangential to the application of the policy.	Natural England and third sector bodies will promote access opportunities, which will have an effect of improving people's health.  There is unlikely to be any materially different effects.

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9.	The water environment: Watercourses and bodies of water within the Cotswolds National Landscape have good ecological and chemical status.	Supporting natural flood management systems and reducing pollution from storm overflows will have some health benefits.	Defra, its agencies, and the local authorities have policies that achieve the same outcome.  There is unlikely to be any materially different effects.
10.	Farming and land management: Farming and land management conserves and enhances the natural beauty of the Cotswolds National Landscape in ways which balance the needs of recovering nature, climate action, food production, supporting livelihoods and public access.	Though not focused on nature recovery, the policy does seek to deliver public goods and service, which will include health and well-being.	Defra and its agencies have policies that achieve the same outcome.  There is unlikely to be any materially different effects.
11.	Development and transport: Development and transport schemes positively contribute to the purpose of national landscape designation and also play a key role in facilitating the economic and social wellbeing of local and rural communities.	The policy points to significant health and societal benefits. There is a focus on meeting affordable housing requirements, particularly housing that is affordable in perpetuity such as social rented housing.	The Planning Authorities regulate development and will have similar housing policies. However, their priorities may be in communities away from the Cotswolds. As a material consideration, these authorities can use the management plan to support their decision making. There may be a more proactive approach with the plan in place.
12.	Health and wellbeing: The Cotswolds National Landscape plays a full part in improving the nation's health, benefitting the mental and physical wellbeing of those who experience it.	The policy seeks significant health and societal benefits. Not only does the policy advocate greater access to green spaces near to communities, it seeks to encourage children and young people in, and from the surrounding areas, to enjoy environmental education opportunities through direct contact with the natural environment. And there is a call for the health sector to make greater use of the benefits that the National Landscape through green prescribing.	Health bodies, local authorities and third sector bodies will support similar initiatives, some of which consider green proscribing. The difficulty will be a lack of coordination when there is a need for active interventions.  There may be a more proactive approach with the plan in place.

13	Access and recreation: The Cotswolds is recognised as a welcoming place, where barriers to access are being removed and everyone feels connected to the landscape.	The policy seeks significant health and societal benefits. The policy seeks to increase and enhance public access across the landscape. There is a priority to engage with communities from the surrounding urban areas, particularly those from areas of high deprivation and those that are not traditional visitors to the Cotswolds. Individuals from within the area who are not currently enjoying or engaged with the benefits of the landscape should also be a priority.	Health bodies, local authorities and third sector bodies will support similar initiatives. The difficulty will be a lack of coordination when there is a need for active interventions.  There may be a more proactive approach with the plan in place.
14	Sustainable tourism: Businesses and visitors have a shared commitment to contribute to the conservation and enhancement of the natural beauty of the National Landscape	There may be some limited benefits through the development of volunteering opportunities that give access to the area.	Health tourism is a growing market and there may be initiatives by the destination management organisations and the private sector.  There is unlikely to be any materially different effects.

There are many organisations that have the opportunity, authority and resources to take meaningful actions. The management plan does not spell out the health and well-being benefits in each of its sections when others do. However, overall, the proposed polices offer some advantages over the donothing option as they support an area-wide approach. Others will act but without coordination, opportunities may be lost. There may be a more proactive approach with the plan in place.

# Appendix 7: SEA Objectives and links to data monitoring

	Indicator 5-point quality scale						
	Score			Comment			
			Fit for purpose				
	2		Adequate	Some minor impr	ovements desirable		
	3		Indicative only	Not considered a	ccurate		
	4		Inadequate	Little relevance to	o the National Landscape		
	5		Absent	No available data	a a		
N°	Environmental Objectives	SEA	indicators	Quality	Commentary		
E1	Climate change Address the causes and consequences of climate change	1.	Level of greenhouse gas emissions within Protected Landscapes (PLTOF TI 6)	3	Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050 relative to 1990 levels. Local Authority level data easily available and can map results for the NL. Cannot get the specific levels. Awaiting publication by Department for Energy Security and Net Zero – was due June 2024		
		2.	Carbon stored by habitats	1	Comprehensive data from Zawadzka, J.E., Keay, C., Hannam, J., Burgess, P.J, Corstanje, R. (2022). AONB Carbon Audit & Metric (land management), Bedfordshire: Cranfield University		
		3.	Extent of tree canopy and woodland cover in Protected Landscapes (PLTOF TI 8)	2	Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline).  Awaiting apportionment by Defra.  Data incomplete because does not include hedgerows and isolated trees.  There are 13,100 km of hedgerows in the NL (PLTOF Stat 11)		
		4.	Climate change adaptation plan in place	5	Awaiting publication. In November 2021 the CNL Board adopted a Climate Crisis Commitment. The CNL Climate		

					Change Strategy (adopted by the Board in February 2022) summarises the current understanding of the climate change impacts on the Cotswolds and what stakeholders can do to both adapt to and mitigate these impacts.
E2	Soils, Air and Water	5.	WFD quality of the water environment data (PLTOF AS 5)	1	Detailed data presented
		6.	Area at risk from flooding (Environment Agency)	1	Up-to-date maps readily available
E3	Protect and enhance biodiversity habitats and species	7.	Extent of wildlife rich habitat created or restored outside of protected sites (PLTOF TI 1)	5	Restore or create more than 250,000 hectares of a range of wildlife-rich habitats within Protected Landscapes, outside protected sites by 2042 Awaiting apportionment by Defra in 2025
		8.	Percentage of SSSI features in favourable condition (PLTOF TI 2)	1	Bring 80% of SSSIs within Protected Landscapes into favourable condition by 2042
		9.	Percentage of SSSIs assessed as having 'actions on track' to achieve favourable condition (PLTOF TI 3)	1	For 60% of SSSIs within Protected Landscapes assessed as having 'actions on track' to achieve favourable condition by 31 January 2028.
		10.	Extent of priority habitat, outside of protected sites, in favourable management through agri- environment schemes (PLTOF TI 4)	5	Continuing favourable management of all existing priority habitat already in favourable condition outside of SSSIs (from a 2022 baseline) and increasing to include all newly restored or created habitat through agri- environment schemes by 2042. Awaiting publication in 2025
		11.	Percentage of land managers adopting nature friendly farming	5	Ensuring at least 65% to 80% of land managers adopt nature friendly farming on at least 10% to 15% of their land by 2030.

			on a percentage of their land (PLTOF TI 5)		Awaiting publication in 2025
E4	Protect and enhance the landscape	12.	National Character Areas which contain Protected Landscape(s), where changes to landscape and waterscape character is assessed as improving / no change / declining (PLTOF SA 10)	5	Data not available until 2025
		13.	Number of geological and geomorphological SSSI unit features and % in favourable or recovering condition (PLTOF SA 15)	1	
E5	Sustain and enhance cultural heritage, including heritage assets and their settings	14.	Number and percentage of nationally designated heritage assets in Protected Landscapes to be deemed at risk (TI 10)	1	Decrease the number of nationally designated heritage assets at risk in Protected Landscapes.
E6	Local Distinctiveness	15.	Number of the area's defined special qualities monitored	5	
		16.	Number of planning authorities with vernacular design guidance mentioning the Cotswolds	2	
		17.	% of development decisions against Board advice	5	
E7		18.	Light pollution maps	1	

	Safeguard and enhance human health	19. Road noise maps and traffic data from 5 monitoring points	1	
		20. Metres of accessible path as a % of total path (PLTOF TI 9a)	5	Defra will request this information from Protected Landscapes bodies in spring 2024, as part of the annual Farming in Protected Landscapes and 'Access for All' monitoring survey/ commission.  Awaiting publication by Defra
		21. Number of disability accessible parking spaces (PLTOF TI 9c)	5	Awaiting publication by Defra (see indicator 21)
		22. Number of accessible gates and gaps (PLTOF TI 9d)	5	
		23. Number of accessible or easy access routes for which wayfinding has been created or improved PLTOF TI 9h)	5	
		24. Deprivation statistics (PLTOF AS 23)	1	
		25. Housing affordability (PLTOF AS 21)	1	
E8	Support a locally embedded	26. Number of visitors	4	Data at local authority level available
	economy	27. Number of local units of registered businesses by industry type (PLTOF AS 22)	1	
E9	Cumulative Impacts – to avoid significant adverse effects between the above interrelationships	No indicator		monitored through annual reporting

# Appendix 8: Précis of consultation responses

Historic England

6<sup>th</sup> December 2024

A clear and well-presented report and assessment of the potential implications.

Thank you for sharing.

Rohan Torkildsen, Partnerships Team Leader South West.