The internationally important habitats and species found across the Cotswolds have been declining significantly for decades. This greatly diminished wildlife now faces additional challenges resulting from climate change. We are now at a potential turning point where new funding mechanisms may help to achieve the recovery of nature, just before it is too late.

## 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 LNRSs are:
  - i. Gloucestershire
  - ii. Oxfordshire
  - iii. Warwickshire
  - iv. West of England
  - v. Wiltshire
  - vi. Worcestershire
- 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 have the potential 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
  - iii. 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 targets for the Cotswolds 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)
  - 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. Continue favourable management of all existing priority habitat already

in favourable condition outside of SSSIs (from a 2022 baseline) and increase to include all newly restored or created habitat through agrienvironment 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 by 2050 across the CNL by 4.59% of the CNL (9,367 Ha). The target for 2030 is 0.92% of the CNL (1,873 Ha)

- 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 habitats listed in Appendix 8. Development should also deliver a net benefit to species using bespoke measures as appropriate, particularly with regard to the species listed in Appendix 8.
- CE8.6. Damage or loss of irreplaceable habitat should be avoided. Irreplaceable habitat includes but is not limited to:
  - I. Ancient and veteran trees
  - II. Ancient woodland (continually wooded since 1600)<sup>40</sup>
  - III. Ancient unimproved grassland (surviving since 1945)
  - IV. Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840)
- 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.

The story of our loss of wildlife is well documented and understood. Habitat destruction and fragmentation is a well-recognised driver now combining with climate change to threaten the loss of our already diminished wildlife at an even greater scale and pace. The need for action is urgent if we are to avoid a mass extinction event.

We know what we have to do to allow our wildlife to flourish and adapt to climate change. We need to create a robust and resilient nature recovery network – a landscape rich in joined up and well managed habitats. The Cotswolds Nature Recovery Plan<sup>41</sup> was adopted as CNL Board guidance in October 2021. It represents a detailed look at the species and habitats of the Cotswolds and what should be done to enable their recovery and adaptation to climate change.

The current extent of wildlife rich habitats within the Cotswolds is 48,000 Ha which is 23% of the area of the National Landscape. The extent of these habitats needed to form a robust nature recovery network that will enable wildlife to flourish and adapt to climate change is 82,000 Ha,

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<sup>&</sup>lt;sup>40</sup> Note this includes ancient semi-natural woodland, ancient wood pasture and parkland, and plantations on ancient woodland sites (PAWS) Natural England and the Forestry Commission have published joint <u>Standing Advice for Ancient Woodland and Ancient and Veteran Trees</u>, (updated in January 2022). This Standing Advice can be a material consideration for planning decisions.

<sup>&</sup>lt;sup>41</sup> Adopted by the Cotswolds National Landscape Board.

40% of the area. The rationale for these figures is outlined in the Cotswolds Nature Recovery Plan. More detail on the targets in CE8.4 can be found in Appendix 6.

We may be-entering a new era of collective and resourced action on delivering nature recovery. The next five years represent an opportunity set a course that can achieve the recovery of nature at the scale required to allow our wildlife to flourish and adapt to climate change. Now is the time to raise our ambition for what can be achieved. The international obligation that the government has signed up to of 30% of land and sea managed for nature by 2030 (30by30) is an indication of this ambition.

New statutory Local Nature Recovery Strategies (LNRSs) have been developed which identify and map nature recovery priorities and measures. They are a key tool for driving and directing resources towards the recovery of nature. Biodiversity Net Gain already uses them for targeting and other funders have indicated a willingness to do the same. There are six of these strategies coincident with the Cotswolds and the Cotswolds Nature Recovery Plan has been used to influence their content. They should be followed as a means of delivering the Cotswolds Management Plan and Nature Recovery Plan.

Supporting LNRS delivery is one of the ways that public authorities, including the CNL Board, can demonstrate their compliance with the biodiversity duty<sup>42</sup> that the Environment Act 2021 introduced. Under this duty they "must consider what they can do to conserve and enhance biodiversity in England."

LNRSs should be compatible with the CNL Management Plan and guidance (including the Cotswolds Nature Recovery Plan). This is one of the ways that the accountable bodies responsible for them can demonstrate compliance with their duty to seek to further the statutory purposes of protected landscapes<sup>43</sup>.

The national statutory Protected Landscapes Targets and Outcomes Framework (PLTOF) (Appendix 6) includes six (out of 10) targets directly relevant to the recovery of nature in the Cotswolds. These are targets for the place and are owned by all stakeholders. When combined with the duties on public bodies to consider what they can do to conserve and enhance biodiversity and to further the purposes of designation of protected landscapes they will help drive resources to the recovery of nature across the National Landscape. This will make a significant contribution to national ambitions for the recovery of nature. The criteria for 30by30 on land in England, published by Defra in October 2024 states;

"Our Protected Landscapes will provide the backbone to 30by30 in England, contributing towards the target where they are effectively managed and delivering in-situ conservation. We recognise that we can, and must, go further within Protected Landscapes than other areas to meet our national environmental targets, including 30by30. This will be driven by the Protected Landscapes Targets and Outcomes Framework, as well as further action to ensure that these special places are wilder and greener. Through their management plans, existing structures and strong partnerships, Protected Landscapes organisations can also play a convening role to champion, identify and support areas that meet, or have potential to meet, the 30by30 criteria."

"It is important that Protected Landscapes deliver a significant contribution towards 30by30 in England. This is key to delivering landscape-scale nature conservation and realising our vision of a well-connected and ecologically representative 30by30 network."

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<sup>&</sup>lt;sup>42</sup> https://www.gov.uk/guidance/complying-with-the-biodiversity-duty. The requirement to comply with this duty also applies to <u>Parish Councils</u>.

<sup>&</sup>lt;sup>43</sup> Levelling-up and Regeneration Act 2023 (legislation.gov.uk)

The guidance on apportioning national PLTOF targets<sup>44</sup> goes on to say; "Successful delivery of the ten targets in the PLTOF will support Protected Landscapes' contribution to the 30by30 commitment."

In the wider countryside agri-environmental programmes are expected to be the most important single mechanism for developing a nature recovery network and Environmental Land Management schemes will play a critically important role. It is essential that they include the measures recommended in the Cotswolds Nature Recovery Plan and Local Nature Recovery Strategies.

Additional funding mechanisms are starting to play an increasingly significant role in supporting the recovery of nature particularly Biodiversity Net Gain as mitigation from development and Payments for Ecosystem Services. Water and carbon collection and storage are becoming increasingly valued as ecosystem services and their importance will continue to grow.

Although the national statutory requirement for net gain in biodiversity arising from development proposals is 10%, It should be 20% within the Cotswolds National Landscape. The justification for this enhanced net gain in biodiversity is outlined in Appendix 9. Local planning authorities may need to gather additional evidence when reviewing their Local Plans. For example, they may need to provide evidence that there are sufficient opportunities to deliver this additional BNG and assess impacts on viability for development. Where there are exemptions to the legal requirement for 10% BNG, the delivery of BNG should still be encouraged.

The inclusion of species within the biodiversity net gain policy is aspirational and would take place outside of the formal development plan related biodiversity net gain process.

New development can have an impact on habitats by increasing access and the erosion, disturbance and litter that comes with it. This impact can be mitigated by providing good quality accessible green space, for example Stroud District Council have the Rodborough Common Recreation Mitigation strategy (2022) and the Cotswold Beechwoods Recreation Mitigation Strategy (2022), both of which seek to conserve these valuable sites from visitor pressures through careful management – using a range of measures including offsetting the impacts of increasing use.'

The priority habitats and species list in Appendix 8 is adapted from Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006, which lists the habitats and species that are of principal importance for the conservation of biodiversity in England. The habitats and species in appendix 8 are considered to be:

- (i) characteristic of the Cotswolds; and/or
- (ii) those for which the Cotswolds National Landscape is considered to a stronghold. There are other priority habitats and species within the National Landscape, which merit an appropriate level of protection, but which do not meet the two criteria outlined above. Habitats and species not on the NERC Act list but which have been identified, by the National Landscape Board and relevant stakeholders, as priorities for the Cotswolds National Landscape are also included.

<sup>&</sup>lt;sup>44</sup> Land Use Consultants (2024) *Protected Landscapes Targets and Outcomes Framework Guidance on apportioning national targets* 

<sup>&</sup>lt;sup>45</sup> https://www.gov.uk/guidance/biodiversity-net-gain. Paragraph 006.

The Cotswolds Nature Recovery Plan defines ancient and veteran trees (based on a list of characteristics), ancient woodland (continually wooded since 1600) and ancient grasslands ("unimproved" and predating modern agricultural practices) as irreplaceable habitat. A wildflower grassland (calcareous, floodplain meadow or other neutral) present in 1945 at the end of the Second World War is likely to be ancient. This should be taken into account when considering proposals that are likely to impact on them.

Ancient hedgerows (present since before the Enclosure Acts, passed mainly between 1720 and 1840) are included as irreplaceable habitat and this should be taken into account when considering proposals that are likely to impact on them because:

- Hedgerows are a priority habitat
- Hedgerows are a key characteristic/feature of many of the landscape character types within the National Landscape's Landscape Character Assessment
- Ancient hedgerows are an important component of the historic environment and the cultural heritage of the area

Although Policy CE8 focuses on the National Landscape and its setting, consideration will also need to be given to ecological networks in the wider environment, for example, river corridor ecological networks where the rivers start in the National Landscape but extend well beyond its boundaries.

One of the ways wildlife adapts to climate change is to move northwards to a new 'climate space'. This means that we need to think about the National Landscape's future wildlife in addition to that currently present, particularly that currently found to the south of the Cotswolds. Big Chalk is a partnership programme aiming to improve ecological connectivity across and between the calcareous landscapes of southern England from the south coast to the midlands.

## Water

## Outcome 9 The water environment

Watercourses and bodies of water within the Cotswolds National Landscape have good ecological and chemical status supported by sufficient quantities of water.

None of the rivers in the Cotswold's achieve good chemical status and only 11.7% of their length achieve good ecological status $^{46}$ . Most of the Water Framework Directive (WFD) failures are linked to fish, macrophytes and phosphate. The water quality of the CNL's rivers is affected by pollution from:

- Wastewater and sewage
- Diffuse rural pollution from agriculture
- Diffuse pollution from towns, villages and roads

Water management needs to address a range of issues including quality, supply and flow in an integrated manner.

<sup>&</sup>lt;sup>46</sup> Protected Landscapes Targets and Outcomes Framework 2024 data release.