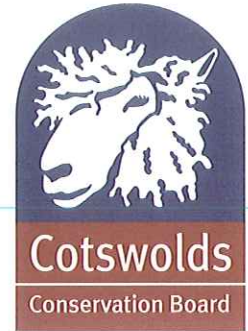


Gary Kennison  
Principal Ecologist  
Planning & Development  
Gloucestershire County Council  
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By email

4<sup>th</sup> June 2009.

Dear Gary,

**Highways and Biodiversity 2009 - 2014**  
**Highways Biodiversity Plan for Gloucestershire**

Thank you for the opportunity to comment on the second Highways Biodiversity Plan for Gloucestershire. The Cotswolds Conservation Board welcomes and supports the GHBP. Since the first GHBP in 2003, the Board has further developed its understanding of the Cotswolds, adopted a new management plan and a set of position statements and landscape strategies and guidelines. Consequently, some of the comments below focus on areas that the Board feels should be included in the new GHBP.

Gloucestershire County Council is part of the Board's Transport Working Group and consequently involved in the creation of the Board's position statement on the Management of Roadside Verges. The Board's position statement should be referred to in the GHBP and included in the references along with the Cotswolds AONB Landscape Strategy and Guidelines

The biggest threat to biodiversity associated with highways is the lack of appropriate management, however, the GHBP focuses on new works such as road improvements. Management of the existing network needs to be much more prominent. Section 5.2 covers verge management with the emphasis on minimal cutting. Point 7 clearly recommends the remainder of the verge is to be left uncut or mown no more than once a year. The Board recommends the last cut of year to be full width to which principle the Highways Authority has agreed.

The Board's comments are on the full Highways Biodiversity Plan for Gloucestershire and not on the abridged or summary versions.

**Detailed comments**

Section 1.3, first paragraph – the habitats may be small, narrow etc, but collectively the county network adds up to a significant biodiversity resource and in some locations is key for habitat connectivity. The GHBP needs to make this clear.

Section 1.4, What is excluded – the District Councils should be encouraged to adopt the GHBP to ensure continuity of approach.

Section 2.1 - Section 85 of the Countryside and Rights of Way Act 2000, places a duty on public bodies to have regard to the purpose of conserving and enhancing AONBs when carrying out their operations. This ensures the purpose for which the AONB is designated is an essential consideration in reaching decisions or undertaking activities impacting on highways. Therefore the GHBP needs to take account of the management

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

plans of the 3 AONBs and subsequent guidance such as the Cotswolds Conservation Board's position statements on road verge management and Landscape Strategies and Guidelines.

Nature Map should also be highlighted as highways can contribute to de-fragmentation and habitat connectivity.

Section 3 – any works on highways can have an effect on biodiversity but so does lack of work. The following paragraphs cover areas such as habitat loss, fragmentation and barriers. These are all created by lack of management. A good example is scrub encroachment. The GHBP needs to consider the impact of this too (see general comment above).

Section 3 – the Board recommends the inclusion of a paragraph covering geoconservation. Highways management and maintenance needs to consider its impact on the geological heritage and the opportunities works on roads and road creation can provide. It would also contribute to National Indicator 197 Local Sites as it is understood the local sites include RIGS and be consistent with table 4 – walls and rock faces.

Section 4.2.1, last paragraph. Delete 'such as', the three AONBs are listed.

Section 4.2.2 – for consistency, the list of bullet points of habitats found next to highways needs to include heathland and bare ground/rock faces and walls.

Section 5.3 – some hedgerows bordering the highway may be eligible for or already in an agri-environment agreement. This opportunity and the financial support available needs to be highlighted.

Section 5.5 – the benefits of the removal of young trees and shrubs should have habitat connectivity added to the bullet point list.

Section 5.6 – in some instances no planting or sowing is appropriate leaving areas of bare ground for natural colonisation, some invertebrates and geoconservation. The bare rock cuttings on the Cirencester by-pass are an excellent example.

Section 5.8 – open excavations, pipelaying etc. Topsoil and subsoil should be stored separately and reinstated in the right order. Also, an additional bullet point covering the avoidance soil compaction would be useful.

Section 5.17 – is overgrazing a problem on highways?

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

Yours sincerely



Mark Connelly  
Land Management Officer

Attachment: Cotswolds Conservation Board Position Statement on the Management of Roadside Verges

# COTSWOLDS CONSERVATION BOARD POSITION STATEMENT



## THE MANAGEMENT OF ROADSIDE VERGES

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Areas of Outstanding Natural Beauty (AONBs) have been designated to ensure that the special qualities of the finest landscapes in England and Wales are conserved and enhanced.

The Cotswolds Conservation Board is the body set by Parliament to conserve and enhance the natural beauty of the Cotswolds AONB and increase the awareness and understanding of the special qualities of the AONB.

This statement on the management of roadside verges has been produced because of the importance of roadside verges to the special character of the Cotswolds AONB.

Responsibility for managing roadside verges primarily lies with the county highway authorities and the Highways Agency, and with District Councils in relation to litter. All these statutory bodies have a duty, under Section 85 of the Countryside and Rights of Way Act 2004, to have regard to the purpose of AONB designation in carrying out their own activities.

### The Issues

The relationship between management regimes for roadside verges and the retention of nature conservation values is complex. If verges are left uncut, wild flowers will disappear as larger, more aggressive, vegetation takes over; but over-enthusiastic cutting, especially when done too early in the year, will also reduce the diversity of plants and the insects that depend upon them.

The development of scrub and trees on uncut verges can also impact negatively on the landscape, blocking views and changing landscape character.

The need is for a sympathetic regime of verge management that meets road safety requirements, is cost efficient but favours biodiversity and landscape. It can be achieved, but it will require significant changes in current practice.

This position statement:

- explains the value of roadside verges;
- describes some of the current problems with management;
- sets out recommended management practices for highways in the AONB.

The recommended management practices have been agreed after wide consultation with highway authorities and others.

Adopted October 2008

## Value of roadside verges

### **Biodiversity**

Mown or unmown road verges are a form of grassland. They provide an important habitat for plants (700 species nationally), birds, small mammals and invertebrates.

Flanked by drystone walls or hedges, such verges are a characteristic element of the Cotswolds landscape. Cotswold verges are generally characterised by false oat grass grassland (MG1 in the National Vegetation Classification) with the richest examples containing some tall herbs such as field scabious and greater knapweed. Where soils are very thin more species rich grassland types occur including the nationally important Unimproved Jurassic Limestone Grassland, CG5. Thus roadside verges contain some important and now rare habitat types.

Roadside verges are especially important for wildflowers. These range from the widespread meadow cranesbill, which is a characteristic of the Cotswolds, and gives the verges a blue tinge when in flower, to the nationally rare downy woundwort which occurs only on road verges and hedge banks in parts of the Cotswolds. Other notable more common species include cowslip, primrose and red campion.

Road verges are important wildlife corridors, particularly in areas of intensive agriculture such as the High Wold and Dipslope, providing [good] linkage between habitats so helping wildlife to maintain viable and sustainable populations and to adapt in response to climate change.

Through the process of natural succession, scrub and trees will grow on road verges, particularly where regular cutting has ceased. Although trees and scrub have biodiversity value, this is usually less than the grasslands that they have replaced and so there is often equal or greater value to be gained by their removal.

### **Landscape**

In parts of the AONB, scrub and trees have developed to such an extent that the character of the landscape has changed, giving a wooded feel in otherwise open landscapes. Tree "tunnels" and mature trees are now strong and characteristic features alongside some roads, but views have been and are being lost to scrub and tree development on road verges.

The Cotswolds contain a network of minor roads, often associated with an abundance of attractive wildflowers. Even very common plants like cow parsley can produce a beautiful effect when they flower en masse.

Dry stone walls, ditches and hedgerows are best conserved by regular road verge management with the verge maintained as a grassland habitat.

### **Historic environment**

Historic features are often located on road verges. These include milestones, wellheads and troughs. Archaeological features and monuments also occasionally extend onto verges or are located on them. These include Roman remains and barrows. Some roads themselves are historic, such as the Roman roads, the salt ways and drove roads. All these features benefit from regular cutting and clearance of surrounding vegetation.

### **Access and general amenity**

Road verges can be attractive to walk alongside where there is little traffic as well as providing a safe route for pedestrians on busier roads and links between public rights of way. Minor roads also provide an attractive network of routes for riders and cyclists to visit and enjoy the area.

Verges are particularly attractive in the spring and summer, providing a colourful view from the car, horseback or bicycle, or from nearby properties, and can offer an attractive entrance to villages and towns. Well managed verges are also important for road safety, providing good visibility for drivers and safe refuges for breakdowns.

### **Management issues**

In recent years there has been a trend towards mechanical cutting of roadside verges before the spring and early summer flowers have had a chance to flower and set seed, even on minor roads and lanes.

Unless removed off site, cut vegetation enriches the soil and encourages rank species (docks, thistles, nettles etc). As a result, more desirable wildflower species are reduced in abundance or eliminated altogether.

Road verges can become a refuge for invasive and injurious plant species such as ragwort and Japanese knotweed and can enable their spread along road corridors. There is a duty on landowners to control such plants and a lack of control on road verges can make it difficult for neighbouring landowners to comply with the duty.

An unintended consequence of cutting is that roadside litter will be exposed unless cleared in advance. Cutting will reveal unsightly litter and debris where previously there were attractive wildflowers.

Much cutting is done on the grounds of road safety, but the benefits of early cutting are often marginal – indeed cutting may be counter-productive by encouraging traffic to speed up.

Overall, except where visibility is clearly restricted and there is a safety issue, the regular and early cutting of roadside vegetation on minor roads in the Cotswolds is unnecessary, expensive, damaging to the character and wildlife of the area and serves only to extend a suburban appearance into the countryside.

## **Objectives**

Taking into account the range of issues identified above, the need is for a management regime which:

- satisfies the requirement to maintain road safety (sight lines, visibility splays etc),
- secures the conservation of, and where possible the enhancement of, the characteristic landscape of the Cotswolds and roadside flora, and
- is practical to deliver by the responsible authorities.

## **Recommended management practices for highways in the AONB**

The county highway authorities, Highways Agency and district councils will use their best endeavours to manage highway verges to meet the objectives set out in this statement and in accordance with the practices set out below, subject to the availability of resources.

The following practices are recommended.

- For all routes vegetation should be cut regularly in front of signs and where necessary to maintain visibility splays for drivers.
- For all main routes, and for those minor routes where pedestrian safety is an issue, a one metre swathe adjoining the carriageway should be cut regularly: this should be extended to two metres where cycle or horse riding safety is also an issue.
- Elsewhere on minor roads the cutting of roadside vegetation should not commence before the end of July, subject to prevailing weather and local conditions.
- Verges on minor roads will usually need to be cut only once and at most twice a year. More frequent cutting should be avoided as this can be detrimental to biodiversity and give an urbanized appearance to the landscape.
- The last cut of the year should be full width to the base of the hedge or wall.
- Ideally cut vegetation should be removed and composted off site particularly on SSSIs and other species rich verges.
- Consideration should be given to identifying road verges of exceptional wildlife interest for special management as Protected Road Verges, following the practice already followed by a number of highway authorities in the AONB.
- Litter should be removed prior to cutting.
- Care should be taken to avoid damage to historic features such as milestones which may be difficult to see in tall herbage.
- Scrub and young trees should be removed from locations where they are encroaching on species-rich grass verges or where key views are being lost or have been lost. Removal is also desirable where there is the opportunity to connect open habitats. Stumps should be treated.

Scrub cutting should take place between September and mid February to avoid the bird breeding season.

- Large trees and tree 'tunnels' should be retained where they are characteristic features unless clear signs of danger are visible such as die back, split limbs, excessive lean and incursion of roots under the road surface. In some situations tree surgery to reduce and lift the crown may be appropriate.
- Invasive and injurious plant species, such as ragwort and Japanese knotweed, should be identified and eradicated before they have a chance to spread.
- Where ditches and culverts occur, these should be regularly maintained and any excavated material removed off site to prevent enrichment of the verge.
- Verges should be restored following the laying of utilities or after road improvements, with reinstatement reflecting locally occurring species. Appropriate grass seed mixes are available to which wild flower seeds can be added if required.

Recognising resource constraints the Cotswolds Conservation Board, in consultation with Natural England and county wildlife trusts, will advise county highway authorities and the Highways Agency on priority areas for application of the recommended management practices.

#### **Position Statement adopted October 2008.**

#### **References:**

English Nature – Cotswolds Natural Area Profile, 1997

Cotswolds Conservation Board – Cotswolds AONB Landscape Character Assessment, 2004

Cotswolds Conservation Board – Landscape Strategy and Guidelines, 2004-2007

Cotswolds Conservation Board – Cotswolds AONB Management Plan, 2008

Gloucestershire County Council – Rationale for Road Verge Restoration and Maintenance of Open Grassland, 2006

#### **NOTES**

The Cotswolds Conservation Board has the statutory duty to pursue the following two purposes:

- a) to conserve and enhance the natural beauty of the AONB; and
- b) to increase the understanding and enjoyment of the special qualities of the AONB.

In fulfilling these roles, the Board shall seek to foster the economic and social well-being of people living in the AONB.

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The Board is comprised of members appointed by the local authorities, parish councils and the Secretary of State. The Board, formed in December 2004, is the only organisation that looks after the AONB as a whole.

The Cotswolds AONB was designated in 1966 and extended in area in 1990. It is one of 40 Areas of Outstanding Natural Beauty across England and Wales. It is the largest AONB, covering 790 sq.miles (2038 sq.km). It is a landscape of equal importance to National Parks such as Snowdonia and the Lake District.

**For further information contact:**

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