**Shropshire Hills**
Area of Outstanding Natural Beauty

www.shropshirehillsaonb.co.uk

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| Direct Line: | 01588 674091 |
| Email: | mike.kelly@shropshire.gov.uk |
| Your Ref: | FC Ref 015900532 |
| Our Ref: | Bryn Shop EIA |

6<sup>th</sup> January 2014

Dear Nick,

### EIA consultation, FC Ref 015900532

Thank you for this consultation.  We have studied the application and for the reasons detailed below, the Shropshire Hills AONB Partnership has concerns regarding the recent and proposed planting of Christmas Trees on land at Bryn Shop.

The Bryn Shop area has been identified as having significant wildlife interest. Shropshire Wildlife Trust and the Upper Clun Community Wildlife group have carried out extensive monitoring of the area and have recorded important bird, butterfly and botanical interest, including BAP species, both on-site and nearby.

The applicants should recognise that "Area 1" is located within a County Wildlife Site and "Area 2" is located between the wildlife site and Kent's Bank, a "Site Alert" recognised as being of equal merit to that of a County Wildlife Site by Shropshire Wildlife Trust and Natural England. The Shropshire Biodiversity Plan also identifies this site as lying within the "Clun Priority Area for Action"

A key reason for the high wildlife interest is due in great part to the benefits delivered by the recent ESA agreement associated with this land. The plant and animal community that has developed over the past years is as a result of significant public investment under this agreement. We believe Christmas tree planting in this area runs counter to the spirit of this agreement and has/will undo years of publicly funded gains at this site.

Furthermore, Bryn Shop is located on the headwaters of the River Teme, and is of particular importance in the context of the River Teme SSSI as this river is considered to be in Unfavourable Condition due to elevated sedimentation, nutrients and an unnatural flow regime.

We are concerned that the short rotation period associated with Christmas tree crops, the loss of stabilising grassland and gripping, planting and harvesting has potential off-site impacts which will increase soil mobility to add to the already unsustainable load affecting the River Teme.

Located on land above 400m, Bryn Shop is part of an area of naturally poorly drained upland characteristic of the Clun Forest. Many such areas have been substantially altered by agricultural improvement in the past, making the areas such as Bryn Shop which retain(ed) greater ecological value and integrity especially important in the context of the wider landscape.

Since Bryn Shop is located within an area of high wildlife and landscape significance, afforestation contributes to further fragment this area, devaluing the wider habitat and landscape value of the Clun Forest. Future management of Bryn Shop should ideally support and

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enhance the ecological value of the site and the surrounding land, working with the natural characteristics of the land rather than working against them

Recent national strategies including the Lawton Report (Making Space for Nature) and Biodiversity 2020: A strategy for England's wildlife and ecosystem services are seeking to conserve, extend and join up such areas we believe this application and runs counter to the spirit of these important initiatives.

The British Christmas Tree Growers Association Code of Practice states:

*"The area of land used for the cultivation of Christmas Trees will have been subjected to a survey on environmental; ecological or archaeological impact. The grower will have taken action to alleviate or minimise any damage as a result of his actions".* It would appear that this proposal fails to adequately address the impact of Christmas tree growing in the area.

On biodiversity, landscape, hydrology and water quality grounds, the Shropshire Hills AONB Partnership therefore objects to the planting of Christmas trees at Bryn Shop.

Should you wish to discuss any aspects please do not hesitate to contact me on the above.


Yours sincerely



Mike Kelly

River Valleys Officer