

Jackie Giles  
Protected Sites: Regulation & Enforcement  
Natural England  
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Telford  
TF3 4LR

Direct Line: 01588 674091  
Email: [mike.kelly@shropshire.gov.uk](mailto:mike.kelly@shropshire.gov.uk)  
Your Ref: EIA 1639  
Our Ref: Felindre EIA

18<sup>th</sup> September 2013

Dear Jackie,

### **EIA Agriculture Regulations Screening consultation, Corkins, Holding 35/036/0042**

Thank you for this consultation. We have studied the application and for the reasons are detailed below, the Shropshire Hills AONB Partnership has concerns regarding the proposal to plough the land known as Corkins.

Corkins has been identified as having significant wildlife interest and is recognised as a 'site alert' by Shropshire Wildlife Trust and Natural England, being of equal merit to that of a County Wildlife Site.

The two parcels, SO1882 4497 and SO1882 5988 adjoin the Black Mountain Common County Wildlife Site to the northwest, southeast and southwest, these sites are unimproved upland moorland sites comprising rush pasture, heathland and mire habitats. To the northwest and south there are also 'site alerts' making this a large area of wildlife significance (see map).

Botanically the Corkins area is significant, supporting many uncommon plant species, including Marsh Violet (see species list) the larval food plant for Small Pearl-Bordered Fritillary, which has been recorded here.

Both these fields are important Curlew sites, used regularly for foraging and at least one pair holds territory at Black Mountain each year. When the grown for silage, Curlew may nest here; Curlew has been confirmed as nesting on adjacent fields in previous years. The fields are also used by Kestrel, Skylark, Meadow Pipit, Linnet, and possibly Stonechat and Reed Bunting which are known to nest in nearby fields.

Located on plateau land above 430m these fields are part of an area of naturally poorly drained upland characteristic of the Clun Forest. Many such areas have been substantially altered by agricultural improvement, making the remaining areas which retain greater ecological value and integrity especially important in the context of the wider landscape.

This land is on the watershed of the Rivers Clun and Teme, it is particularly important in the context of the River Teme SSSI, the River Clun SAC and its population of freshwater pearl mussels downstream. Both rivers are considered to be in Unfavourable Condition due to elevated sedimentation, nutrients and an unnatural flow regime. There is potential for off-site impacts, as any ploughing will remove the wetland flora, damaging the capacity to retain soil water and increase soil mobility to add to this already unsustainable load.

We would also add that the application lacks detail, in that, the description of the proposed work only indicates ploughing. The application does not stipulate for what reason land is to be

ploughed, what type of ploughing is to be undertaken and what management regime will follow.

Since the fields are located in the centre of an area of high wildlife significance (see map and photograph), ploughing will fragment this valuable area of landscape, devaluing the wider habitat value of Black Mountain Common and Corkins Bank. Future management of Corkins should ideally support and enhance the ecological value of both the fields themselves and the surrounding important land, working with the natural characteristics of the land rather than fighting against them.

We understand the holding is currently in ESA. The plant and animal community that has developed over the past years is as a result of significant investment under this agreement. We believe ploughing of permanent pasture runs counter to the spirit of this agreement and will undo years of publicly funded gains at this property.

On biodiversity, landscape, hydrology and water quality grounds, the Shropshire Hills AONB Partnership therefore objects to any proposals to plough land at Corkins.

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

Yours sincerely

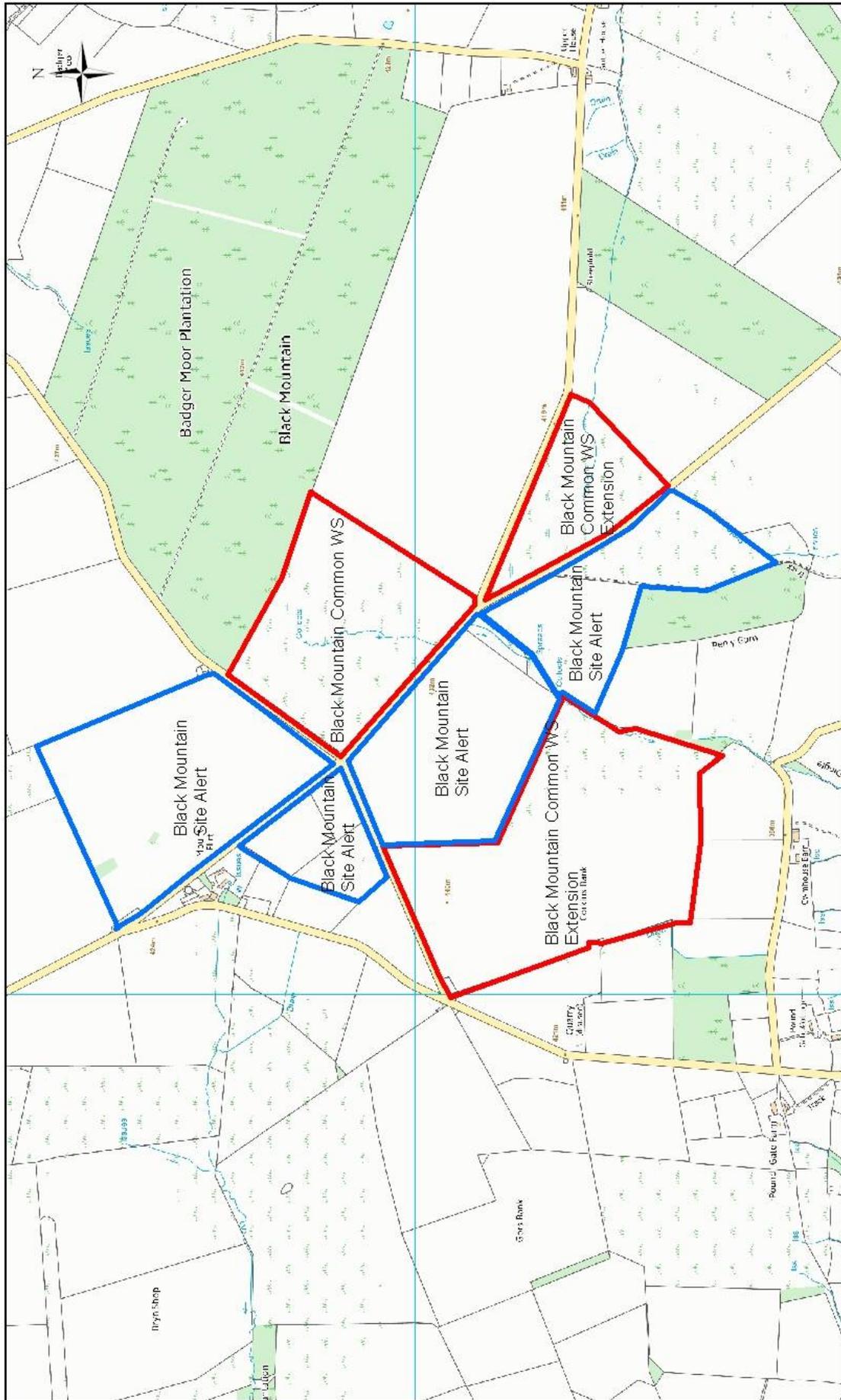
Mike Kelly  
River Valleys Officer



Adjoining Black Mountain County Wildlife Site



Corkins in context of the surrounding landscape



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## Black Mountain Common Wildlife Sites (Red) And Black Mountain Site Alerts (Blue)

**Shropshire Hills AONB Partnership**  
 The Old Post Office  
 Shrewsbury road  
 Craven Arms  
 SYZ 9NZ

*Corkins Wildlife Site Species List  
2009-2012*

**Species in Bold - Uncommon**

**Formal Name**

*Agrostis canina*  
*Agrostis capillaris*  
*Alauda arvensis*  
*Anthoxanthum odoratum*  
*Aphantopus hyperantus*  
*Athyrium filix-femina*  
*Aulacomnium palustre*  
*Bellis perennis*  
***Blechnum spicant***  
*Callitriche stagnalis*  
***Caltha palustris***  
*Cardamine pratensis*  
***Carex echinata***  
***Carex leparina***  
*Carex nigra*  
*Carex panicea*  
***Carex pilulifera***  
*Cirsium palustre*  
*Coenonympha pamphilus*  
*Crataegus monogyna*  
*Cynosurus cristatus*  
*Digitalis purpurea*  
*Dryopteris dilatata*  
***Epilobium palustre***  
*Epilobium tetragonum*  
*Festuca ovina agg.*  
*Galium palustre*  
*Galium saxatile*  
***Galium uliginosum***  
*Holcus lanatus*  
*Hypochaeris radicata*  
*Juncus articulatus*  
*Juncus effusus*  
***Lathyrus linifolius***  
*Lotus corniculatus*  
*Lotus pedunculatus*  
*Luzula campestris*  
***Luzula multiflora***  
*Mentha aquatica*  
***Molinia caerulea***  
***Montia fontana***  
***Myosotis discolor***  
***Myosotis secunda***  
*Nardus stricta*  
*Oreopteris limbosperma*  
***Pedicularis sylvatica***  
***Pieris napi sabellicae***  
*Poa annua*  
*Polytrichum formosum*  
*Polytrichum juniperinum*

**Common Name**

Velvet Bent  
Common Bent  
Skylark  
Sweet Vernal-grass  
Ringlet  
Lady Fern  
Bog Groove-moss  
Daisy  
**Hard Fern**  
Common Water-starwort  
**Marsh Marigold**  
Cuckooflower  
**Star Sedge**  
**Oval Sedge**  
Common Sedge  
Carnation Sedge  
**Pill Sedge**  
Marsh Thistle  
Small Heath  
Hawthorn  
Crested Dogs-tail  
Foxglove  
Broad Buckler-fern  
**Marsh Willowherb**  
Square-stalked Willowherb  
Sheep's Fescue  
Marsh-bedstraw  
Heath Bedstraw  
**Fen Bedstraw**  
Small Sweet-grass  
Cat's-ear  
Jointed Rush  
Soft-rush  
**Bitter Vetch**  
Common Bird's-foot-trefoil  
Greater Bird's-foot-trefoil  
Field Wood-rush  
**Heath Wood-rush**  
Water Mint  
**Purple Moor-grass**  
**Blinks**  
**Changing Forget-me-not**  
**Creeping Forget-me-not**  
Mat-grass  
Lemon-scented Fern  
**Lousewort**  
**Green-veined White**  
Annual Meadow-grass  
Bank Haircap  
Juniper Haircap

*Potamogeton polygonifolius*  
*Potentilla erecta*  
*Ranunculus flammula*  
***Ranunculus omiophyllus***  
*Rumex acetosella*  
*Saxicola torquata*  
*Sorbus aucuparia*  
*Sphagnum*  
*Stellaria graminea*  
*Stellaria media*  
***Succisa pratensis***  
*Trifolium dubium*  
*Ulex gallii*  
*Urtica dioica*  
***Vaccinium myrtillus***  
*Vanellus vanellus*  
*Veronica becabunga*  
***Veronica officinalis***  
***Viola palustris***  
*Viola riviniana*

**Bog Pondweed**  
Tormentil  
Lesser Spearwort  
**Round-leaved Crowfoot**  
Sheep's Sorrel  
Stonechat  
Rowan  
Sphagnum  
Lesser Stichwort  
Common Chickweed  
**Devil's-bit Scabious**  
Lesser Trefoil  
Western Gorse  
Common Nettle  
**Bilberry**  
Lapwing  
Brooklime  
**Heath Speedwell**  
**Marsh Violet**  
Common Dog Violet