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Your Ref: EIA 1717  
Our Ref: Hoarstone Cottage EIA

8<sup>th</sup> January 2014

Dear Jackie,

### **EIA Agriculture Regulations Screening consultation, EIA 1717**

Thank you for this consultation. We have studied the application and for the reasons detailed below, the Shropshire Hills AONB Partnership has concerns regarding this proposal to plough land near Hoarstone Cottage.

The two field parcels, ID 9799 and 5512 are located in an area considered to be of significant wildlife interest. They adjoin the 40ha "site alert" at SO198824 (recognised by Shropshire Wildlife Trust and Natural England, as being of equal merit to that of a County Wildlife Site).

The two parcels are located in a wider area of landscape and wildlife significance. To the west, are Black Mountain Common and Bryn Shop County Wildlife Site and site alerts. These sites are unimproved upland moorland sites comprising rush pasture, heathland and mire habitats, supporting many uncommon plant species, butterflies and birds.

Located on plateau land at 400m these fields are within 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. The field parcels should not be seen as separate, but as part of a mosaic of unimproved pastures vital to integrity of the upland wildlife community, ploughing will fragment this landscape. Future management should ideally support and enhance the ecological value of both the fields themselves and the surrounding land, working with the natural characteristics of the land rather than fighting against them.

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.

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 near Hoarstone Cottage.

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

Yours sincerely

Mike Kelly

River Valleys Officer