

Jackie Giles  
Environmental Impact Assessment (EIA) Unit  
First Floor  
Temple Quay House  
2 The Square  
BRISTOL  
BS1 6EB

Direct Line: 01588 674091  
Email: [mike.kelly@shropshire.gov.uk](mailto:mike.kelly@shropshire.gov.uk)  
Your Ref: EIA 1983  
Our Ref: EIA 1983 Mount (Amblecote)

4<sup>th</sup> February 2015

Dear Jackie,

### **EIA Agriculture Regulations Screening Consultation, EIA 1983 Mount Bank (Amblecote)**

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 improve land near Mount Bank.

Studies of aerial photographs for the fields 6176 and 6047 identify areas of unimproved pasture, flush, and mire habitats. This is likely to be BAP habitat which will have high botanical interest and will also be important nesting habitat for waders, such as curlew and snipe.

Furthermore, any agricultural improvement will constitute a threat to the freshwater environment and any decision to improve the pastures (including fields 2502 and 5195) should be made in the context of the River Clun SAC Nutrient Management Plan (NMP) <https://www.gov.uk/government/publications/nutrient-management-plan-river-clun> and the River Clun SSSI/SAC Restoration Strategies <http://www.shropshirehillsaonb.co.uk/wp-content/uploads/2012/03/River-Clun-Restoration-Strategy-v3b.pdf> and <http://www.shropshirehillsaonb.co.uk/wp-content/uploads/2012/03/Jacobs-River-Clun-Restoration-Strategy.pdf>.

These recent studies consider the main reason for decline of the River Clun SAC to be intensification of land management practices upstream of the SAC, particularly those that lead to elevated levels of nutrients, sediment and pesticides. The River Clun NMP sets clearly defined targets; this proposal increases the potential for increased N and P load to the River Clun.

The application of fertiliser and lime represents an obvious threat to these increasingly rare habitats, any loss will impact on local biodiversity priorities and also on national targets, including the objectives set out in Biodiversity 2020. These 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 of the Shropshire Hills. .

We would suggest these fields are accurately assessed by a suitably qualified botanist/ecologist prior to any screening decision.

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

Yours sincerely

Mike Kelly

Natural Environment Officer