

## Shropshire Hills AONB Partnership: Comments on the Local Flood Risk Management Strategy

Part 1: Group Strategy	
4.2	<p><i>Typical issues include: Increased runoff from agricultural land due to changes in .....</i> Recommend recognition of a highly modified hydrology as an “issue” and a “source of flood risk” Only a small proportion of agricultural land in Shropshire is naturally well drained. Post-war under-drainage, field ditches, highway drainage etc. has disrupted the natural capacity of land to store and then slowly release water. Hydrological connectivity between land and river is now significant, which combined with current and predicted extreme weather events is likely to overwhelm natural systems and “Structures”</p>
5.3 9.12 9.14	<p>Climate Change – <b>NB</b> Natural England have produced Climate Change Adaptation Manual - Up to date and relevant to Shropshire - many refs to water and land management  <a href="http://nepubprod.appspot.com/publication/5629923804839936">http://nepubprod.appspot.com/publication/5629923804839936</a></p>
8.5	<p><i>Other Sources of Funding:</i> Recommend including the New Environment Land Management Schemes (NELMS) which are proposed to have greater emphasis on resource protection – this is a potential funding source for land managers to address runoff and pathway issues and also to provide capture and storage solutions – Not all farms will be eligible but some joined up work between LA’s and NE may deliver multiple benefits</p>

Part 2: Policies and Action Plan Specific to Shropshire	
3.0	<p><i>The regulation of all other land drainage systems within Shropshire rests with Shropshire Council:</i> Clarification: Does land drainage extend to agricultural underdrainage? If not, should the Policy and Action Plan recognise this as a risk?</p>
3.2	<p>Providing conditions are met regarding flow, a culvert may be preferable to alleviate environmentally damaging activities such as poaching and animal fouling at livestock/vehicle fords (bridges are prohibitively expensive)</p>
Objective 2	<p><i>Work with landowners to reduce the impact of flooding due to changes in agricultural land management practices;</i> - This is quite an open ended objective, how can this be achieved? Currently there are too many barriers which limit collaborative working to deliver at a catchment or landscape scale. Ultimately it comes down to finances for farmers. There will need to be improved incentives for those land managers that deliver societal benefits. Recommend strategy considers an ecosystem services approach to deliver this objective - this has the potential to deliver multiple benefits and is an approach supported by Natural Environment White Paper.</p> <p>Recommend this strategy work to use/restore “Natural Capital” Historically, too much reliance on “end of pipe” or engineered solutions. For example promote capture and storage at source - in the uplands. Most rain falls in the uplands; It is here we have lower value land, and lower farm incomes – perhaps a paid ecosystem services approach should be explored in the Strategy</p>

Objective 3	<i>In developing our Register of Structures and Features, gain an improved understanding of the interactions between the various drainage systems that drain communities located in flood risk areas;</i> Clarification: What defines a “Structure or Feature” is this referring to engineered structures? Highways, Farm tracks, land drains, compacted soils etc. are all pathways (features?) that contribute or encourage accelerated runoff to add to flood risk
Objective 4	<i>Preserve the natural state of land drainage systems and minimise the number of man-made alterations to watercourses;</i> See Part 1: 4.2 Recommend strategy recognise that the “Natural State” no longer exists. Shropshire’s freshwater environment is highly modified. Successive generations have canalised and re-profiled rivers, drained wetlands and uplands; we have disconnected rivers from floodplains, installed ditches and drains, created multiple source/runoff pathways etc. Recognising we are still on this continuum is important and that it has in great part resulted in the problems we now experience. The proposal for “Blue Corridors” is perhaps an opportunity to rehabilitate elements of the freshwater/riparian environment.  Clarification: Is permission required to install land drains? Many agricultural holdings are coming out of agri agreements and land drains which have deteriorated over the period of agreement may be restored to improve farm productivity. This will have consequences, in further reducing the capacity of land to retain/release water.
Objective 5	Is it worth adding a section to include Natural England and Environment Agency? This strategy should aim to influence regional targeting policies and allied funding arrangements (E.g. Agri-Environment targeting)

Part 3: Strategic Environmental Assessment for Shropshire	
5.2	Should this section also refer to sites of international importance? European Designated sites: SAC’s, SPA’s and RAMSAR?
Table 6.1	Recommend specific reference to the Shropshire Hills AONB - a protected landscape
7.2.1	BAP’s? Perhaps this section should mention “ <i>Biodiversity 2020</i> ” Biodiversity Strategy for England as this is most relevant in terms of national strategy
7.2.2	<i>The Strategy could go further to ensure it has a positive impact on designated and undesignated habitats, and urban green space environments within Shropshire.</i> Designated sites may be shared with neighbouring counties and thus affected by activities in Shropshire. Should this strategy recognise this? For example: Clun SAC: Shrops/Herf and the River Teme SSSI: Shrops/Powys/Herfs/Worcs
7.6.1	Recommend including reference to Soil Protection Review (A Cross Compliance requirement) - as a mitigation and enhancement measure.
7.6.2	Recommend not singling out Nitrate. The impact is more than that related to NVZ’s and NSA’s - Diffuse pollution (sediment and P) is also adversely affecting those water bodies failing to achieve Good Ecological Status for WFD and also for those Natura 2000 sites failing to achieve favourable condition.

	Recommend getting support of Rural Payments Agency. Rural SuDS may be difficult to implement as farmers are financially penalised for taking land out of agricultural production (Certain Rural SuDS are likely to be considered a “permanently ineligible feature” PIF by RPA)
7.7.1	The Shropshire Hills AONB is a uniquely sensitive landscape and should be recognised in this section - It is Shropshire’s only protected landscape - As recognised in Shropshire Core Strategy
7.8.1	<i>The Strategy should prevent additional flow entering existing drainage systems and watercourses benefitting the human and natural environment.</i> As Part 2 Objective 4
7.8.1	<i>.....the creation of the Shropshire ‘Climate Change Guide for Communities’</i> Ref Natural England’s Climate Change Adaptation Manual?
Appendix A – National plans	Recommend the inclusion of the Lawton Report – “Making Space For Nature” Underpins the recommendations outlined in HM Gov’s Natural Environment White Paper <a href="http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf">http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf</a>
Appendix A – National plans	Recommend the inclusion of the Natural Environment White Paper: “The Natural Choice: securing the value of nature” - It outlines the Government’s vision for the natural environment over the next 50 years – Flood risk, ecosystem services, climate change etc. <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf</a>
Appendix A – Local and county plans	Recommend inclusion of the Shropshire Hills AONB Management Plan - A statutory document which relates to ¼ of Shropshire. - The CRoW Act requires local authorities to produce AONB management plans. The IUCN categorises AONBs as Category V Protected Areas <a href="http://www.shropshirehillsaonb.co.uk/looking-after/management-plan/">http://www.shropshirehillsaonb.co.uk/looking-after/management-plan/</a>
Appendix B 1.1	<i>Two of these areas are now in major funded projects to deliver landscape-scale conservation, including the Meres and Mosses of the Marches Nature Improvement Area.</i> Recommend inclusion of the Stiperstones and Corndon Hill Country Landscape Partnership Scheme. There are also area based partnerships which are working to deliver at a landscape scale, these include The Clun Catchment Partnership, Wrekin Forest Partnership and Clee Hill Partnership
Appendix B 5.3	Comment as 7.6.1 Soil protection Review Also <i>Likely Future Conditions:</i> Agriculture is subject to the vagaries of the global market place and an increasing UK and global population is bringing about land use change that places greater demands on sensitive soils/landscapes. For example; arable intensification of previously grazed pastures has resulted in greater soil mobility and reductions in water and habitat quality. Its impact is insidious and not sufficiently reflected in the EA’s National Incidents Recording System
Appendix B 7.3	Include the Rivers Clun and Kemp as “Main River”