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Dear Conor

### **Response to Consultation on Draft River Basin Management Plan (Severn District)**

The Shropshire Hills AONB Partnership welcomes many of the measures detailed in the Draft River Basin Management Plans. I have considered these plans carefully and with particular reference to the Upper Teme Catchment, and outline here on behalf of the AONB Partnership, responses to the questions detailed in the consultation document 'Water for Life and Livelihoods':

## **Q1 Do you agree with the assessment of problems with water bodies**

1. Suggest that *Phytophthora* be listed as a *specific pressure (other impact)* in Annex G.

*Phytophthora alni* is a hybrid pathogen spreading throughout Europe, killing many of the alder trees vital to stabilising the banks of small rivers and streams.

In the Shropshire Hills continuous canopy woodland lines our rivers and streams, with alder accounting for approximately 80% of riparian trees. An important component in the local ecology, alder provides shade to regulate water temperature and provide food and cover for sensitive aquatic wildlife.

2. Suggest neglect and under-management of rural water bodies be listed as a *significant management issue* in Annex G.

Allied to point 1 is neglect and under-management; diseased and over-mature trees are difficult and expensive to manage, increasing numbers of fallen trees will cause flow problems, accelerate sedimentation and nutrient input.

3. Invasive Alien Species

Annex G states that "*presence will not obviate achievement of good ecological status*" Suggest this should be reconsidered -presence may be defined as only one plant or it may be widespread, two very different scenarios, we would question how good ecological status be justified for the latter case?

N.B. Despite the requirement to control invasive plants under Cross Compliance, the presence of invasive plants such as Himalayan balsam (previously controlled by livestock) is likely to become increasingly problematic as Environmental Stewardship schemes encourage the fencing of watercourses.

## Q2 Do you agree with the proposed objectives?

### 1. Potential conflict of objectives

The River Clun SAC is cited in, Annex D (p70) and states: *the date for achieving environmental objectives is 2015*. Yet Annex B Objectives (p444) states: *the Proposed Status Objective (overall) is to achieve good status by 2027* (includes the SAC) – is this a conflict of objectives?

### 2. Proposed objectives may be set too low to safeguard protected area status

It is proposed that by 2015 27% of river length (Teme) achieves good status or potential (p29 Water for Life Dec 2008). There is no target to achieve high status by 2015 for any waters in the Teme Catchment.

Whilst we recognise the “one out all out” principle sets the bar high, consideration should be given to achieving high status for the most vulnerable protected areas. We specifically have concerns about the future viability of the Clun SAC, especially as the lower section of the River Clun is not one of the 27% of water bodies achieving good status by 2015. The objective for good status is by 2027, 2015 being cited as technically infeasible (Annex B) – Is this a conflict of objectives?

The Clun SAC is principally designated for the freshwater pearl mussel, a species demanding of the very highest water quality. With no recruitment of young, the Clun pearl mussel is now considered functionally extinct. Current trends would see the pearl mussel extinct and for this reason the SAC lost by 2024.

We would argue that if the Clun SAC is to be safeguarded, all 5 components of overall status will need to be of the highest order, achieving high rather than the good status should be priority at the earliest date possible.

## Q3 For some water bodies we have proposed objectives with deadlines after 2015 or a lower overall target. Do you agree with these changes?

Only if protected areas can be safeguarded within the target timescales (2015?) or if by a later deadline the upper overall target is achieved for that protected area.

## Q4 We have followed a process to assess (appraise) these actions. Do you agree how we have done this?

Yes

## Q5 What comments do you have on these actions? Are there any actions that have been missed or any changes you'd propose?

Under scenarios A and B - HLS and Catchment Sensitive Farming are the principal means to deliver reductions in nutrients, organic pollutants, sediments etc. and bring into favourable condition/maintain Natura 2000 sites. This should be encouraged, however there are number of issues to be considered.

1. Issue – Delivery of HLS/CSFI may not be sufficient to address rapidly declining Natura 2000 sites (see response to Q2 above).
2. Issue – The Teme Catchment Sensitive Farming priority target areas are the Rivers Clun and Corve - The extra weighting given to these areas effectively excludes most of the Catchment with regard to capital grant eligibility.

3. Issue – The Teme Catchment Sensitive Farming scheme is over-subscribed even in priority areas – points based system has the potential to exclude worthy schemes.
4. Issue - Significant number of holdings in the upper Teme are in ESA schemes and many are due to finish between now and 2013. There is no guarantee that these holdings will graduate to Higher Level Stewardship.
5. Issue - Outside of ESA many holdings are in Entry Level Scheme. There is uncertainty about HLS, perceived to be onerous by some farmers.
6. Issue – HLS does not guarantee improvements in water quality (depends on the options) - Water quality specific measures should be a factor in scheme eligibility.
7. Additional Measure - Consider monitoring of alder disease in Teme Catchment and implement programme of control.
8. Additional Measure - Consider monitoring of invasive plants promoted by fencing of watercourses in Teme Catchment.

NB A recent Study by Natural England (2009) *Climate Change Impact Assessment and Response Strategy: Shropshire Hills Character Area* States that: '*Rural payments may need to be tied to the provision of **ecosystem services**.*' This report provides backing for getting more for water quality out of HLS and other schemes. See:

[http://www.naturalengland.org.uk/regions/west\\_midlands/ourwork/climatechangeproject.aspx](http://www.naturalengland.org.uk/regions/west_midlands/ourwork/climatechangeproject.aspx)

## Q6 What comments do you have on Scenario C actions - Do you have, including any additional information you can supply about specific actions

Scenario C - Other delivery mechanisms might be considered eg LIFE + projects for delivering Natura 2000 sites to favourable condition. Potential of Regional Life + bid

## Q7 What support can you offer? Such as undertaking any actions or providing resources

1. There is no reference to Protected Landscapes in the consultation documents or annexes. AONBs and National Parks have statutory Management Plans. These Plans address resource protection issues and complement many of the objectives of RBMP. AONBs account for 18% of the land cover in England and Wales, while National Parks account for 7% of England and 20% of Wales.
2. In Protected Landscapes, special projects or partnership work may be delivering water quality improvements – Consider contacting these organisations to assess current and future projects. For example the Shropshire Hills AONB Partnership is working with NE and Teme CSFI to facilitate riparian habitat improvements to benefit the River Clun Freshwater Pearl Mussel population.
3. The Shropshire Hills AONB Partnership has commissioned a risk assessment for the potential of translocation of Pearl Mussels in the River Clun. Water quality in the Clun is not of sufficient quality to sustain Pearl Mussels; the AONB will be working with partners to target additional resources to improve water quality.

## Q8 Do you agree with our assessment of how climate change will affect pressures on the water environment?

1. Consider including pathogens as a *Biological Pressure* – There is likely to be increased risk from pathogens such as *Phytophthora*. Forest Research has modelled the spread of *Phytophthora* in trees given differing climate change scenarios. The loss stabilising of riverbank alder is likely to increase, promoting erosion and sedimentation.
2. Warmer, wetter winters and drier summers will stress riparian trees and encourage susceptibility to pathogens.
3. The inevitability of climate change should not preclude taking actions to safeguard vulnerable protected areas. e.g. for the River Clun SAC and Teme SSSI significant buffering against climate change can be achieved by reducing sources of harm not linked to climate change (the win-win and no regrets options?). This will increase environmental resilience allowing protected areas to better withstand the impacts climate change may bring about. Actions should be balanced against the financial penalties imposed should protected area status be lost.

If you wish to clarify or discuss further any of the above comments, please do not hesitate to contact me.

Yours sincerely

Mike Kelly  
River Valleys Officer