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Your Ref:  
Our Ref: Walcot Abstraction

18<sup>th</sup> January 2011

Dear Mr Fuller,

### **Walcot Abstraction NPS/WR/005706**

Further to the surface water abstraction application submitted by Greenvale AP Ltd. On behalf of the Shropshire Hills AONB Partnership I would like to take this opportunity to forward comments with regard to the proposed scheme.

I understand that the flow management report produced by Envireau Water details proposals to maintain existing flow conditions in the River Kemp and subsequently at the River Clun SAC and River Teme SSSI. With the proviso that there is adequate monitoring of flow levels if the application is approved I am satisfied that water levels at the Clun SAC can be maintained.

However, I have concerns that if the application is successful this provides de facto approval for cropping practices that are incompatible with safeguarding a freshwater pearl mussel river. From the information submitted there seems to be little indication that the applicants have given due regard to the consequential impacts of spray irrigation.

My concerns in relation to the above issues are as follows:-

- I understand the applicants are proposing to crop potatoes. The application does not provide any information on past land use and potentially supports increased intensification of land a relatively short distance upstream of the SAC. Potatoes are a nitrogen dependent crop that promotes mobile soils. Given the close proximity to the river, I believe this method of cropping is not compatible with conserving an extremely vulnerable and rapidly declining freshwater pearl mussel population.
- The Envireau Water report provides comprehensive flow data, but very little information relating to spray irrigation and its potential to increase diffuse pollution. The Executive Summary states "implementation of buffer strips around cropping areas [...] are believed to appropriately mitigate the potential impact to the SAC". This is not sufficiently reassuring. Buffer strip effectiveness is determined by width, vegetation structure/complexity, soil type and angle of slope. As there is no buffer strip specification, I have concerns regarding their effectiveness.
- Appendix 11 only stipulates buffer strips on land sloping towards the river and lake. However, this part of the Kemp has many ditches associated with field boundaries. Do the applicants intend to include functioning buffers alongside ditches also?
- Buffer strip effectiveness may be further comprised by land drainage - has this been taken into account?

- There is the likely use of molluscides to safeguard potato crops; Metaldehyde has a very slow rate of breakdown in water and has recently been detected in waters of the Teme. Extremely sensitive to pollution of any kind, there has not been any recruitment of juvenile pearl mussels in the River Clun for decades. The potential use of chemicals specifically targeting molluscs is extremely concerning.

I would be grateful if you could take into consideration the above points when considering the application for abstraction at Walcot Pool.

Yours sincerely

Mike Kelly  
**River Valleys Officer**