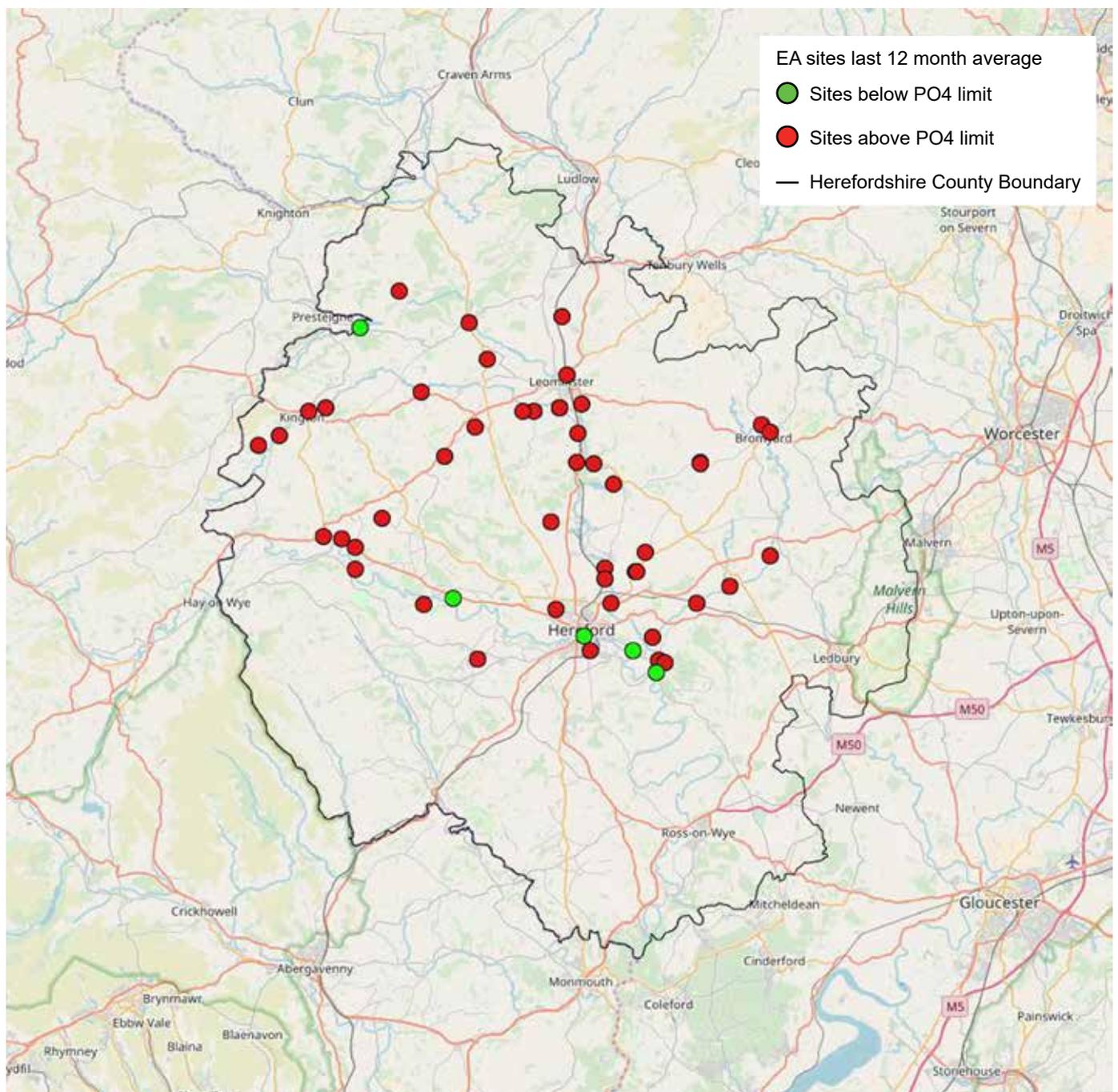


## Herefordshire's water quality and the Nutrient Management Plan



Map showing 12 month average Environment Agency (EA) phosphate (PO<sub>4</sub>) levels at sampling points on the Herefordshire Wye/Lugg catchment - see text overleaf for explanation

# WATER QUALITY

## **Often our rivers are where economic pressures and environmental constraints most obviously come face to face. Herefordshire is no exception.**

Most of Herefordshire is in the catchment of the River Wye and its waters are a measure of the health of the county's environment. A lot of our drinking water comes from the river and its tributaries.

### **Pollutants**

The rivers are also where much of the pollution generated by human activity goes. One of the most important of these pollutants is phosphate. Too much phosphate encourages the growth of too much plankton, which can over-shade or suffocate fish and other plants. In extreme cases it can lead to blooms of toxic algae harmful to humans and animals.

How phosphate accumulates in rivers is complicated and not fully understood by scientists. There seem to be two main sources for the Wye.

*First, "point sources":* These are mainly sewage works (bodily waste is rich in phosphate) and some industrial plants.

*Second, "diffuse sources":* Run-off from land surrounding the river. This too can contain a lot of phosphate from animal waste as well as phosphate bound up in soil particles. The kind of farming carried out and how it is managed has a big effect here.

### **Recording phosphate levels**

The River Wye itself has a high level of protection under European law as a Special Area of Conservation (SAC). This includes the River Lugg tributary as far as Hope-under-Dinmore. The Environment Agency (EA) regularly checks phosphate levels in the SAC, and the tributaries that feed

into it, to ensure that they stay within agreed ceilings. In recent years the Wye has generally stayed within its ceiling –although often too close for comfort –but the Lugg is heavily and continuously over it.

### **Phosphate and new housing**

This presents serious problems for housing growth in the county: with more houses come more people and with more people come more sewage and therefore more phosphate in the rivers. Unless something can be done, Herefordshire Council's plans for new housing risk being unlawful.

### **Herefordshire Local Plan and the NMP**

When the Council was finalising its new Local Plan Core Strategy in 2015, it tackled this problem by creating a Nutrient Management Plan (NMP) to get all phosphate levels within the ceilings by 2027 at the latest, even allowing for the extra phosphate generated by the new housing included in the Core Strategy. And it set up a Board to 'deliver' the NMP.

On this basis the Core Strategy was accepted as legal by a government inspector and came into force in October 2015.

Now, over two years on, what progress is the Board making towards the critical 2027 target?

The short answer is no one knows.

So far the Board has not even monitored the EA phosphate data - and without such monitoring how can the Board know whether the actions it is promoting are working and whether the 2027 target is still viable? For nearly two years the EA has been promising the Board a "dashboard" that will turn the raw data into an easily understood graphic form, but so far nothing has emerged.

### **Phosphate mapping commission by Herefordshire CPRE**

The good news is that Herefordshire CPRE has done the EA's job for it and commissioned an expert to extract the raw data from the EA's website for every current sampling point in the Upper Wye and Lugg catchment inside Herefordshire and turn the data into a set of easily read graphs and a map. You can look at it here (red points are over the ceiling, green are under. Click on each point to bring up the graph for that point). The map can be found at: <http://r5r.eu/eaop4/index.html>

The map is based on autumn 2017 data.

As of that date only five out of 49 sampling points were 'green' i.e. within the ceilings. The graphs show that when the Board started work in autumn 2015 eleven points were green.

### **So, on the face of it, in the two years since the Board started work, the situation has got worse, not better.**

Unless the Board can get a grip on the situation and create a significant and robust trend showing that the 2027 target can be achieved, then the NMP will be defunct and the whole Core Strategy which depends on it risks being unlawful and potentially facing challenge in the courts.



*Confluence of the Rivers Lugg and Wye - the lower Lugg is consistently above phosphate limits*

# PROPOSED HEREFORD BYPASS

Yet again Herefordshire's iconic Wye Valley is threatened by road building. A short-list of seven bypass routes west of Hereford City has been published. The preferred route will be agreed later this year.

Bypasses have been discussed in Hereford since the 1960's when an Inspector rejected all the proposed routes and CPRE campaigned against potential damage to the Lugg Meadows in the east. Fifty years on Herefordshire Council's Core Strategy to 2031 includes a western relief road despite most traffic being short local journeys. Herefordshire argues that a new road is needed before sustainable transport measures are implemented. All other routes around Hereford are ruled out.

All seven western routes cross the Wye Valley in Breinton, a rural parish known as Hereford's green lung since Victorian times. The River Wye here is both a European Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI). Hereford is truly fortunate to have such outstanding landscape on its boundaries. This picturesque landscape was captured by Brian Hatton and other painters before World War 1 and remains unspoilt today. The local flora and fauna are exceptional.

All the routes require a high level bridge across the river gorge threatening ancient woodland bringing noise, light and exhaust pollution to tranquil open countryside. At a cost likely to exceed £200m this road wastes scarce national resources, will not remove congestion but will irretrievably damage a historic environment.

Local residents and CPRE Herefordshire will be opposing this unnecessary road.



*Local campaign to stop the bypass*

*Below: Summer Wye at Breinton*



# POLYTUNNELS AGAIN!



*Polytunnels in Herefordshire - a growing problem*

We have seen an increase in applications for polytunnels over several years and are concerned by a largescale proposal in the south of the county - Biddlestone Farm, Llangarron Hfds. HR9 6NT Planning Application for up to 32 hectares of fixed non-rotating Spanish Poly tunnels + 6 other related applications January 2018

This large holding was once a Pick your Own organic soft fruit farm, with associated orchards and livestock. It is high grade agricultural land. For the past seven years, in different ownership, it has been used for intensive growing including potatoes. The owner applied two years ago to have rotating polytunnels erected to enable soft fruit growing but the application was withdrawn through unresolved drainage issues.

The current application is for up to 32 hectares of non-rotating Spanish (i.e. linked) polytunnels over arable soft fruit crops (on 'table-tops', i.e. off the ground). The associated applications involve ground profiling to form water balancing ponds, change of use of land from agriculture to a site for the accommodation of seasonal agricultural works in demountable portable modular buildings (PODS) with ancillary toilet, recreation, shop facilities etc., a pump-house building, a lorry docking platform and the upgrading of the vehicular access to A4137 road together with a new, internal access road. Up to 240 temporary workers will be accommodated on site.

The land is prominent and the polytunnels will be alongside the A4137. Because of the topography they will be visible from long distances as well as from the road and from nearby footpaths.

HCPRE is concerned primarily about the adverse effect on the landscape, particularly as these polytunnels will be permanent. We are also concerned about potential pollution of the watercourses and contamination of the popular Biddlestone Fishing Lake. The River Garron could also be at risk. Boreholes for water for irrigation have proved unsuccessful in the past so water may have to be imported.

The road (A4137) is notoriously dangerous, and the increased traffic arising from this development, if permitted, will increase the hazards. There are no pavements and the verges are narrow.

At the end of February 2018 there have been a considerable number of representations with objections to the applications, numbering c 546; these include the two neighbouring Parish Councils.

HCPRE has added its voice to these objections and we can only hope that this inappropriate and visually invasive development will not be permitted.

# 'LAND PROMOTION' AND HOUSING DEVELOPMENT

'Land promotion' – sounds like a good thing doesn't it? With overtones of improvement and commitment to the countryside. But recent CPRE research highlights an ugly reality behind the cosy phrase.

Land promoters pursue planning permission for landowners at no cost to the landowner until the land is sold for development when they get between 20 and 25% of the profits. They target councils with a weak planning policy framework, either those without a local plan or those not able to demonstrate a five year supply of housing land (that is, enough land to deliver the target set out in the Council's Core Strategy which is suitable and available for housing development. Herefordshire as at April 2017 had 4.34 year supply).

CPRE's research found that 60% of the applications promoters take to appeal in areas which could not demonstrate a five year housing land supply are successful. This compares with 28% of ordinary appeals for housing applications.

One such outfit, Gladman Developments Ltd, has taken an interest in Herefordshire.

In Bromyard, Pencombe Lane, (120 houses App no: P163001/0) their first application was turned down by Herefordshire Council; the Inspector dismissed the appeal because of problems with safe pedestrian access. Significantly for those who care for the rural landscape the Inspector did not agree with the Council's view that the application would have an adverse affect on the landscape and setting of Bromyard because another recently built development, to the east of the site, has already degraded (in his words 'adversely impacted') this area visually and in landscape terms .

As ever undeterred by this failed appeal, Gladmans have submitted a second application, which, according to objectors, differs very little from the first. The Council has yet to make a decision on this application.

Gladman's were more successful in their first application in Ledbury (P143116). They appealed against the Council's refusal of permission. The Inspector's decision was that, as Herefordshire Council was unable to demonstrate a five year land supply, the appeal should be approved. Crucially this development is outside what local people regarded as the natural edge to urban development, the bypass. The draft neighbourhood plan has consequentially shown an altered and slightly awkward settlement boundary to include this site.

Gladman's second Ledbury application (435 homes app no: P174495/0) is for an adjacent field further from the town, further into the countryside. The development is opposed by the Town Council, Malvern Hills AONB and Ledbury Civic Society as well as 550+ local residents. If other sites with planning permission and those earmarked for development in Herefordshire's Core Strategy are built out, approval for this application would push Ledbury's new homes to more than 1500, nearly double the number Herefordshire's Core Strategy requires to be built (800). Other applications in the pipeline (Bovis P174745) could push this total well over what would be sustainable for the town.

To defeat the predatory attentions of a land promoter, it helps (but is not a guarantee of success) to have a five year land year supply at strategic planning level, and an adopted, robust neighbourhood development plan (NDP) locally. Herefordshire Council is making rapid progress towards the former; and, we urge local councils to progress their NDPs.



*Ledbury building underway...*



*...and adjacent land under threat*

# HEREFORDSHIRE CPRE WEBSITE

## Website & social media assistant

We recognise the importance of social media in running successful campaigns and promoting our aims and values. Having a strong social media presence is essential to Herefordshire CPRE in engaging its existing supporters and extending its influence more widely especially to younger people. In addition to our new website we now have both a Facebook and a Twitter account, where you can follow or contact us.

Our administrator, Barbara Bromhead Wragg, wishes to concentrate more time on her professional commitments and has been unable to increase her time commitment to include these additional tasks. We are therefore in the process of engaging a part-time website & social media assistant.

Barbara will continue with our day-to-day administration needs, as well as being line-manager for our new team member (we're not letting her off that easily!).

### Don't forget:

#### The Barbara Washbourne Memorial Lecture

#### Those Blue Remembered Hills - Valued Landscapes in a Time of Change

**Speakers: Carly Tinkler and Jem Waygood**

**Thursday 26th April at 7.30pm at  
The Courtyard, Edgar Street, Hereford**

Admission by **FREE ticket** available from:  
The Courtyard Box Office  
01432 340555 [boxoffice@courtyard.org.uk](mailto:boxoffice@courtyard.org.uk)

**Places are limited so early application is advised.**

## Bi-monthly Branch Meetings

11.00am on second Tuesday of alternate months  
(April, June etc), at RVS  
**All Welcome**

Yes, another new website! The previous website served us well for a few years, but technical issues made it cumbersome and difficult to update, and we know that this caused some frustration to our members. The new website has undergone a complete overhaul and we hope you will find it easy to use. Developing a new website by committee can take time but iLateral, our new website hosts, have been very patient and understood our needs well.

The biggest change is a revision of the navigation menus. On review, we realised that visitors could be confused by the headings, making it difficult to easily access information. We hope the new headings will allow visitors greater facility in quickly finding the page they are looking for and a better understanding of the activities of the branch.

The new homepage is much simpler, with one main information box which we are using as a quick link to meetings – in 2018 we moved to bi-monthly meetings. Below this are the main areas Herefordshire CPRE is concerned with: Planning, Transport, Farming & Energy, each heading being broken further into separate issues. At the bottom of the page are four boxes for quick news links to branch activities and CPRE reports. We kept the colour palette that is so recognisably Herefordshire, and an overall design that is in keeping with the CPRE brand.

Happily, the new system is very intuitive to use and gives us greater access to design elements of the site. For example, we can change the background picture according to the season, whereas previously this image was part of a template that we could not alter.

We have arranged a training event to allow staff and volunteers to learn how the system works. Hopefully this will be a short session - our Administrator reports that she easily accessed the system, being able to make simple changes, without any training.

We are in the process of employing a dedicated website and social media assistant and feel confident Herefordshire CPRE can offer an improved public face by embracing the most up to date communication technology.



Campaign to Protect  
Rural England  
Standing up for your countryside

CPRE Herefordshire  
[www.cpreherefordshire.org.uk](http://www.cpreherefordshire.org.uk)

Vice Chairman: Mr B Widdowson, Vice Chairman: Dr T Geeson,  
Secretary: Mr D Phelps, Treasurer: Mr P Goode

Registered Charity No. 213951