

Partnership Meeting

Supplement 3 to the agenda for

Wye Catchment Nutrient Management Board

Wednesday 16 April 2025

2.00 pm

Conference Room 1 - Herefordshire Council, Plough Lane
Offices, Hereford, HR4 0LE

4. QUESTIONS

The attached document contains further responses received from statutory agencies up to 3 July 2025.

Pages

3 - 4

Questioner: Nick Day, The Friends of the Lower Wye

The Nutrient Management Plan published by NRW et al in November 2021 included an ambition to "target work by sub catchments based on P evidence report but also taking into account other relevant evidence" (P46). In the River Trothy sub-catchment, Citizen Scientists have recorded persistent high levels of phosphorus and other pollutants over the past several years.

What steps have NRW taken to reduce the nutrient load in the Trothy,

What further actions are planned, and

What and by when are the expected outcomes of current and planned actions?

Response from Natural Resources Wales (NRW)

NRW's Central Monmouthshire Opportunity Catchment project 2022-2025 involved working with farmers in the Central Monmouthshire area to deliver on-the-ground interventions that benefit water quality and WFD status, and improve wider biodiversity and resilience.

During this period the project worked on four farms within the Trothy sub-catchment. Intervention outputs were:

1.65 km riparian fencing (preventing livestock access to watercourses), 1 new bridge (replacing a ford type crossing for cattle); 9 drinking troughs and associated infrastructure; 500+ new trees. Another approximately 2500 trees were planted at two of the project farms by Stump Up for Trees following collaboration with this charity.

A further phase of the project with similar objectives is proposed for 2025 – 2030.

In addition 24 farms were visited between 21 and 24 resulting in two enforcement notices, 2 formal cautions, 7 warning letters and a potential enforcement case.

Questioner: Nicola Cutcher, Friends of the River Wye

Given the problems caused by soil run-off from maize growing in the catchment, will the NMB ask Defra to introduce legislation which would require all maize to be under-sown? Or would this be better addressed through special measures for the Wye?

Response provided at the Nutrient Management Board (NMB)

The Chairperson expressed a view that, given recent and current reviews, mitigating soil losses needed to fit within the existing regulatory framework and not require a separate law to be brought into statute; it was added that the regulations and guidance should take full account of the importance of soil retention and the need for this to be a pillar of good farming practice.

Question for NRW: Are you seeing any increase in fields in Wales growing stubble turnip for sheep over winter? Are you concerned about the soil run-off from these fields? Do you think it's wise for the Welsh Government to be incentivising this practice through subsidies?

Response from Natural Resources Wales (NRW)

'Are you seeing any increase in fields in Wales growing stubble turnip for sheep over winter?' May be local anecdotal evidence but WG would probably have the actual data of hectarages grown.

'Are you concerned about the soil run-off from these fields?' Any person causing or knowingly permitting a polluting substance to enter controlled waters is an offense under the [Water Resources Act 1991](#) Reg 85. NRW welcome WG Control of Agricultural Pollution Regulations review recommendation number 6 [Statutory review of the Control of Agricultural Pollution Regulations: 2025 review](#) to include soils protective measures from Cross Compliance.

'Do you think it's wise for the Welsh Government to be incentivising this practice through subsidies?' NRW continues to advise WG on measures to protect and enhance the environment but suggest you pose this question to WG.

I also have further questions for the EA:

Given the [internal documents we uncovered](#) showing the local EA Land and Water team have "strong concerns about the impact on the River Wye" should the AD at Whitwick Manor be granted permission - will these concerns be relayed by the EA to Herefordshire Council as part of the planning process?

Relatedly, can the EA confirm its mapping is not fit for purpose, given it was unable to identify that the Whitwick Manor AD site is in the Lugg catchment? And what is being done to rectify this?

Response from the Environment Agency (EA)

We have identified that some of the emission limits and monitoring requirements within the permit did not fully reflect those proposed by the applicant. Upon reviewing this information, we decided that whilst the permit conditions were appropriate, the proposals from the operator would represent greater environmental protection. We have therefore undertaken a variation of the permit to amend certain emission limits and monitoring standards. This has not changed our decision to grant the permit, rather further enhance environmental protection and the standards to which the operation must adhere. A copy of the variation has been provided to Herefordshire Council's planning officer.