

**POLICY STATEMENT FOR THE USE OF THE RIVERS WYE AND LUGG -
SUMMARY OF RESPONSES AND COMMENTS**

Question 1

Does the Policy Statement provide sufficient background information to enable you to understand the issues it seeks to cover?

If No, what aspects or matters would you like to see explained further?

1. Would like to see development of more specific policies and proposals in the future. (Hereford Civic Society)
2. Need more information about how policies will be applied. (Ross Rowing Club)
3. Generally happy with content of statement. (Herefordshire Sports Council)
4. Explain legal requirements, byelaws and planning requirements particularly in relation to flood risk. (Environment Agency)
5. Supports the aims and objectives set out in the draft. (Ross-on-Wye Chamber of Commerce)
6. Supports the background information and statement of principle. (Philip Williams)
7. Language is pompous. Says everything yet nothing. (Leominster Town Council)
8. There should be more supporting background data, especially upon noise impact, pollution, and potential economic benefits of leisure and tourism uses of the river. (Christopher Lovell)
9. Accept the draft proposals in the document and no further comments to make. (Dwr Cymru/Welsh Water)
10. Trust is neutral on issue relating to the rivers except where it might affect proposals to restore the canal – no comments to make. (Herefordshire and Gloucestershire Canal Trust)

Question 2

Does the 'Statement of Principle' provide a suitable balance between the various interests to be accommodated?

If No, how might the priorities be changed?

1. Needs more detail of how different interests will be accommodated. (Ross Rowing Club)
2. Important to afford access for all sorts of uses where damage to the environment will not be incurred. (Dr and Mrs M Bucknell)
3. Statement of principle – bullet point 3 should include wildlife, as for example wildfowl help the water condition while providing leisure for naturalists. Public can unintentionally destroy habitats they come to see. (Dr David Boddington)
4. Policy is incomplete and unbalanced (reference to what is omitted is given in Q8). (J A Nicholas Wallis)
5. The statement of principle does little more than list the possible uses. It does not establish a balance between them. This needs more background information. (Christopher Lovell)
6. Support statement of principle and emphasis given to various types of boating. (Diocese of Hereford)
7. Supports key statement of principle, PS2 and PS3. (Sport England)
8. Supports the statement of principle in relation to access and opening access up. Nevertheless, careful consideration needs to be given to balance wider interests, e.g. wildlife and habitats. (Herefordshire Local Access Group)

Question 3

Do you agree with the emphasis given in the to both non-motorised boating and motorised craft?

If not, how might this be changed?

1. Have managed their stretch of river for over 100 years and are applying for permission to dredge the river to permit racing. It is conscious that river levels have fallen over past decade. More details on limitations needed (e.g. speed). The river profile does not support heavy traffic. (Ross Rowing Club)
2. No attempt should be made to increase motorised craft use. (Herefordshire Local Access Group)
3. Motorised craft and other leisure uses should be restricted to zones and possibly times of year. Use of motorised craft is a contentious issue and would be happier to see a more detailed policy specific to this. (Aymestrey Parish Council – primarily in relation to River Lugg)
4. Motorised and non- motorised boating would benefit tourism in the City. (Dr and Mrs M Bucknell)
5. Would like to see a code of conduct for river use that takes into consideration trees and woodlands along river course. (West Midlands Conservatory, Forestry Commission)
6. Ban motor craft - noisy, pollute water and air, and destroys plants fish and riverbanks. Non – motorised craft should be main target. (Dr David Boddington)
7. Worried that motorised craft may cause environmental damage if not supervised and inspected regularly. (David Price)
8. Support limited motorised traffic - no speed boats – provided no conflict with peace of the river. (Fownhope Local History Group); (Fownhope Residents Association)
9. Yes to boating and motorised craft but only model powerboats on the Lugg. (Leominster Town Council)
10. Motorised craft should be severely limited by allowing limited licensed passenger carrying motorised craft; limiting the power of personal craft; not allowing towing by motorised craft except in emergencies. (Christopher Lovell)

11. Do not support motorised craft for recreational use. Non- motorised craft should be registered. Banksides should be made available for walking. Herefordshire is at last benefiting from some good areas of still water for boating etc. and should be used by both young and elderly alike. (Mr J R Preece)

12. Interested in more access points, including for disabled, and in further facilities being planned at Wellington. Would like more information about these, including about changing facilities, boat storage, etc. The use of weirs for energy generation is laudable but may affect the use of the rivers by kayaks and canoes. Chutes may be needed as a consequence. The weirs on the Lugg are well suited to advanced water skills laid down by the BCU. (Hereford Kayak Club)

13. Happy with the emphasis given to boating but would wish to see adequate protection against bank erosion and loss of habitat. (Philip Williams)

Question 4

Do you consider there is potential and capacity for more active use and promotion of the rivers and their surroundings for sporting use, informal recreation, leisure and tourism?

It would help if you could explain your viewpoint.

1. Sporting and similar uses should only be on suitable open water bodies, not all. Need to have specific uses in specific zones. Should be a general principle that any activity should not destroy, degrade habitat or disturb wildlife. (Herefordshire Nature Trust)
2. Consider there is more potential for active use and if promoted will attract further groups. (Ross Rowing Club)
3. Rivers have potential for greater use by schools/colleges for outdoor pursuits and adventure tourism. (Herefordshire Sports Council)
4. Leisure use of the river could be increased by a limited amount of dredging. Visitors to the town could be attracted if boats were available to hire. (A R Crathorn)
5. Only a small proportion of the riverbanks are available to the public, and flooding has caused the loss of sections of paths. The Council should be concerned to develop increased access along riverbanks. (The Ramblers Association)
6. Point to the attractiveness of the river within the City to visitors and residents, while its use seems limited only to a regatta and fishing competitions. (Hereford Regeneration Group)
7. Happy to see development of the riverside for leisure and recreation in certain areas (undefined). (Philip Williams)
8. There is potential for more capacity and promotion of the rivers but strict controls are needed to preserve the environment. Encouraging to see due regard will be given to ensure river access is integrated into the Rights of Way network. (Herefordshire Local Access Group)
9. Open access to the whole length of the Lugg would be detrimental. (Aymestrey Parish Council – primarily in relation to River Lugg)
10. The rivers are underused as an asset. (NB reference to HC selling the canoe centre?). (Dr and Mrs M Bucknell)

11. Promoting use for recreation etc must not conflict with the management of riverside woodlands or trees to open up the navigation route or riverbank for more capacity or moorings adjacent to these habitats, which could be of ancient origin. (West Midlands Conservatory, Forestry Commission)

12. Seasonal ban to restrict land and water travel in certain sensitive areas. Policy statement 3 is good but must be educationally complete as just letting ideas loose could be catastrophic to environmental importance. Influence should be two-way (page 10) – protection from passers by and encourage users. (Dr David Boddington)

13. Canoeing should be encouraged with more access points on the river, especially between Hereford and Hoarwithy. (Fownhope Local History Group); (Fownhope Residents Association)

14. There is potential for more recreational use etc, but only if you wish to destroy its present assets and quality. (Leominster Town Council)

15. There is more potential for non-motorised craft, as the river was historically busy with commercial craft. Today it is only fit to serve anglers. River based activity holidays should be promoted. (Christopher Lovell)

16. More active use of the river is a good thing but must be in the areas with capacity and the necessary infrastructure. Strongly object to proposed plans to develop the Rapids at Symonds Yat. This area is too congested with much noise and litter; poor access, potential impact on the flood plain, impact on wildlife. This area is in danger of being spoilt by too much development and overcrowding. Other parts of the Wye could be used without causing problems. (Mr and Mrs P Adams)

17. The rivers are already being used close to capacity. Encourage young people to learn about and take part in water-based activities. (Mr J R Preece)

18. Fully agree with the expansion of leisure activities but have strong reservations about all types of boating due to nature and construction of the river. Have witnessed many accidents over the years due to people's inexperience of the river. (Eaton Fishing Club)

19. There is only limited safe physical access to the rivers. Access points on both sides of the river are needed to reduce shortcomings and should be signposted. (Diocese of Hereford)

20. Agree that more use should be made of the rivers for informal recreation, but swimming should be discouraged. It is felt there are adequate access

points to rivers via existing highways and footpaths. (Sutton St Nicholas Parish Council)

Question 5

How might we ensure all relevant stakeholders are involved in managing the range of uses associated with the rivers?

1. There are already a range of groups and organisations formed to involve stakeholders in matters related to the rivers. Representatives should not simply be from users. Email communication should assist stakeholder consultation. (Herefordshire Nature Trust)
2. A controlling body should be created that is open and with a clear brief. (Ross Rowing Club)
3. Hold an annual meeting of all stakeholders to discuss events planned and general matters of interest, particularly to balance competing interests. (Herefordshire Sports Council)
4. Would like to see encouragement to consult prior to any planning applications including sport activity. (Sport England)
5. All stakeholders should be notified of proposals arising from the policy and reviews of implementation published. (Philip Williams)
6. There is the need to create a sense of ownership by the community and partnership working amongst relevant bodies and organisations. (Herefordshire Local Access Group)
7. Trust would wish to contribute to discussions. (Herefordshire and Worcestershire Earth Heritage Trust)
8. All organisations involved need to share views and ideas. (Dr and Mrs M Bucknell)
9. Database of all interested parties should be kept. Engage communities at parish hall level when information needs to be disseminated. Hold annual stakeholder meetings. (West Midlands Conservatory, Forestry Commission)
10. Identify central and peripheral individuals and bodies who would be stakeholders. (Dr David Boddington)
11. Frequent consultation and updates on events needed- may be a quarterly newsletter and website. Suggest a local body to advise and consult on issues. (David Price)

12. Should involve local farmers and horticultural interests; those in generating power and in water treatment. (J A Nicholas Wallis)
13. Let councillors be the managers. (Leominster Town Council)
14. Set up a consultative group of stakeholders, publicly inviting people to offer themselves as members. (Christopher Lovell)
15. Stakeholders should be governed by agreement of rules and guidelines for good behaviour, safety and regard to other users. Bailiffs should be appointed to monitor activities. (Mr J R Preece)
16. Meetings should be held with the clubs and bodies to discuss points of view and feelings. Whatever extra activities are promoted it will have to be with co-operation of existing users. (Eaton Fishing Club)
17. Consult as you are doing now. (Diocese of Hereford)

Question 6

Are environmental concerns, such as landscape, biodiversity and historic heritage adequately protected, with appropriate opportunities provided for their enhancement?

If No, what further provisions would you like to see?

1. Need more proactive statement to enhance biodiversity; further surveys needed to enforce and monitor policy area. Should be aware of protected species issues and need to survey these before works. Need a statement for no net loss in biodiversity and support BAP targets. (Herefordshire Nature Trust)

2. Environment Agency should make use of knowledge held by many user groups. (Ross Rowing Club)

3. Biodiversity – reference should be made to the river supporting UK and local BAP species; incorporate reference to wildlife/nature conservation in para 3.2; acknowledgement should be made that the Agency will promote navigation to ensure sustainable management of the river and conserve its ecology in para 4.2; conflicts occur between users and nature conservation as well as between different users; PS 3 gives wrong impression - that presumption is in favour of leisure developments in view of the many constraints that exist; PS 5 should present nature conservation in a more positive light; HC should make a stronger statement to ensure the protection and enhancement of wildlife. (Environment Agency)

4. Pleased to see support for addressing BAP targets in PS5 but would like to see this specifically support protection and enhancement of ancient woodlands and there are significant blocks of such in both river valleys. There should be an audit of ancient (veteran) trees, which are a valuable biodiversity resource, to help protect and manage them. (Woodland Trust)

5. Need to protect banks from erosion, for habitats and against invasive species. Does not think environmental matters are adequately protected, especially the banks, habitats and from invasive species. (Philip Williams)

6. Appropriate Assessments are required for any plans or projects affecting the rivers where they are special areas of Conservation and Gloucestershire County Council would wish to be consulted. (Gloucestershire County Council)

7. Heritage aspects of the river should be increased. (Herefordshire Local Access Group)

8. Although recreational and sporting use are commendable, the policy on biodiversity and the key statement of principle should be the overriding force of the document. Environmental improvements have led to flourishing tourism at a level the area can sustain. Despite detail being lacking about this, it is recognised that the document is a broad policy statement that adequately covers the issue. Protecting river habitat should be overriding principle. More weight should be given to conservation of the natural asset so it can be enjoyed by future generations. Policies on landscape, biodiversity and heritage lack substance but should be of paramount importance where conflicts may arise between policies. Efforts seem to be made to please all parties, which is impossible. (Aymestrey Parish Council – primarily in relation to River Lugg)

9. Geological, glacial and Geomorphological features are not adequately protected. (Herefordshire and Worcestershire Earth Heritage Trust)

10. Should be a plan to remove invasive species and promote natural vegetation. (Dr and Mrs M Bucknell)

11. The FC would prefer a statement that the policy of 'keepers in time' would be adopted as policy intent by HC (advise on 'keepers on time' provided). (West Midlands Conservatory, Forestry Commission)

12. Should open and close loop paths according to season to protect habitats from unintentional disturbance. Be aware of S40 of Natural Environment and Rural Communities Act. (Dr David Boddington)

13. Environmental issues should take priority over sporting issues. (David Price)

14. Control spread of polytunnels within the AONB. Suggest low key interpretation boards at historic sites such as Lea brink, Shipley Boat, Mansells Ferry and Capler Quarry. (Fownhope Local History Group and Fownhope Residents Association)

15. Statutory nature protection and historic heritage legislation are adequate. (Christopher Lovell)

16. Insufficient importance is given to the value of water quality, including for wildlife. (Mr J R Preece)

17. Environmental concerns are adequately provided for given the rivers are SSSIs. (Eaton Fishing Club)

18. Environmental policy seems to be aspirational rather than specific to protect the environment and historic heritage. (Diocese of Hereford)

19. There is concern about the continuing and increasing abstraction of water for agriculture, particularly strawberry growing, which is not currently controlled by the licensing system. Licensing control should apply to trickle irrigation. (Sutton St Nicholas Parish Council)

Question 7

How might these features be utilised to promote measures for rural regeneration, tourism and local awareness?

1. Natural environment is a good driver for rural regeneration. (Herefordshire Nature Trust)
2. Need greater communication within user groups. Greater control of water abstraction needed to regulate water level. (Ross Rowing Club)
3. Relevant authorities seem to pass buck on regulatory matters and clearing the river of rubbish such as supermarket trolleys. This detracts from the potentially attractive nature of the river and its potential as a tourism resource. (Tim Kidson)
4. The river is a major tourist attraction and working with parish councils and other groups should seek to promote this further. (Herefordshire Sports Council)
5. Walking is the most popular outdoor activity and walkers spend money in local pubs, cafes, shops, hotels, B&Bs, and events such as the Walking Festival should be used to develop the economy of the County, developing a network of paths around settlements, which will also improve health. (The Ramblers Association)
6. Suggest rebuilding weirs to a level to provide an all-year round facility and suggest the benefits this might bring. (Hereford Regeneration Group)
7. Distribute publicity more widely, about facilities and events. (Philip Williams)
8. Sustainable recreation such as cycling and walking should be given emphasis in project work. (Herefordshire Local Access Group)
9. Support policy on renewable energy although keeping intrusion to a minimum. HC and E Agency must balance all interests. Zoned approach again referred to. Present management of Lugg seems to be working well with noticeable improvements to banks and water quality. Pushing regeneration and recreation policies too much may lose the uniqueness and unspoilt character of the County. (Aymestrey Parish Council – primarily in relation to River Lugg)

10. Geotourism can contribute to regeneration of rural areas. There is great potential for active geotourism, with guided trails etc. (Herefordshire and Worcestershire Earth Heritage Trust)

11. Encourage cycle paths. Tourism policy acceptable but sometimes the attraction is more important to community life than the tourist. (Dr David Boddington)

12. Advertise to attract tourists to create more jobs and boost local economy. (David Price)

13. More use should be made of riverside footpaths, and associated facilities. Resist proposals for river crossing at Hampton Park (i.e. eastern City bypass.) Support footbridges for recreational access linked to PROWs. Protect riverside paths, e.g. at Lea Brink. Create new paths from Lucksall to Mill Farm, and Capler wood to Hoarwithy. A new footbridge is needed between Fownhope and Holme Lacy. Support AONB Picturesque project, including low key interpretation boards and leaflets. Support restoration of hydro-power schemes, using tributaries. Examples of sites include Mordiford Mill at Pentalo, Nupend, Totnor, etc. Seek new footbridges to make better use of footpath network, especially where there are long gaps between bridges. The Fownhope Millennium Bridge should be a priority. (Fownhope Local History Group and Fownhope Residents Association)

14. The balance is very delicate – best to conserve what we have and have strict access controls. (Leominster Town Council)

15. Use history of river to create tourist trails and local displays. These might include lost trades, historic management of water meadows, etc. as basis for eco-tourism. Activity holidays should be promoted together with associated riverside development, under careful planning controls. Do not allow noisy intrusive and potentially damaging activities. (Christopher Lovell)

16. The rivers have limited potential for rural regeneration, tourism and local awareness. Land based facilities are likely to be more effective and already exist. (Diocese of Hereford)

Question 8

Have all other matters of importance to the use of the rivers been covered adequately?

If not, what else do you feel needs to be covered?

1. Would like to see extension to Wye Valley AONB. Suggest the need for a statement on need for high quality development within environs of Rivers Wye and Lugg. (Hereford Civic Society)

2. Issues not covered include climate change, invasive species, conflict between policies, and provision of natural soft flood defences. Climate change will affect flows in the rivers (dry spells and flooding) and hence this is an issue that will have a greater impact on therefore needing more coverage in the document. (Herefordshire Nature Trust)

3. Environment Agency should create a Wye/Lugg control department. (Ross Rowing Club)

4. Should consider development of mineral extraction sites and how planning discussions can make greater use of this particular neglected/potential water recreation resource. Why was the Rivers and Flat Water Study shelved or ignored? (Herefordshire Sports Council)

5. Water Resources – No accurate indication can be given of how much water is available for further abstraction or details about restrictions until March 2008. (Environment Agency)

6. The River Arrow should be included. (The Ramblers Association)

7. There are problems of silting up and rubbish being thrown into the River Wye, such that it is almost impossible to use for boating. (Hereford Regeneration Group)

8. There is no statement about water abstraction. (Philip Williams)

9. A map showing the County areas should accompany the document, with contact details for the relevant Councils. Supports section 5 "Other Issues", in particular the need to integrate transport plans. However concerned that promotion as a tourism and leisure destination may affect Gloucestershire when visitors arrive predominantly by car, which can cause problems for local residents in the Forest of Dean, where inappropriate roads and parking are issues. Greater emphasis should be given to the prime and ancient use of the

rivers for fishing, especially the importance of salmon fishing on the Wye. (Gloucestershire County Council)

10. Consideration should be given to extending the AONB. (Herefordshire Local Access Group)

11. No reference to the rock structure and Geomorphological processes to which the valleys have been subjected. Various detailed amendments to statements recommended relating to geological and geomorphological matters. (Herefordshire and Worcestershire Earth Heritage Trust)

12. Does not take into account changes of access rights for the public that are likely to occur due to litigation involving HC, Church Commissioners and HDAA. Opposes limiting the banks within the City for use by private fishing club. (Dr and Mrs M Bucknell)

13. Recommend including a policy statement on tree/woodland management. (West Midlands Conservatory, Forestry Commission)

14. Extend Wye Valley AONB to include all the Wye valley and the River Lugg Valley. This will assist the resolution of conflict and help attract funding for access projects. (Ben Nash)

15. Should make greater reference to floodrisk, renewable energy and training. (Dr David Boddington)

16. Put profit generated back into the rivers for future generations. (David Price)

17. Need to consider productive use of water for irrigation, power and potable use (people and livestock). (J A Nicholas Wallis)

18. Concerns include agricultural pollution and water abstraction. Action on these should be taken now. (example given). (Mr J R Preece)

19. Health and safety issues will have to be discussed in depth with all parties. (Eaton Fishing Club)

20. Any development of banks should not restrict public access. (Diocese of Hereford)