From Duncan Fulton (Chair SWT Clun & BC Branch)

Dear Hayley Deighton (Strategic Clun Liaison Group)

The Committee of the Clun and Bishop's Castle Branch of the Shropshire Wildlife Trust has now had the opportunity to discuss the Strategic Clun Liaison Group's response of 13 May to the Branch's Resolution passed unanimously at its meeting on 16 April. We have assessed the Group's response and offer our comments below. And we have referred our assessment to the Clun Climate and Environment Group, Lightfoot (its Bishop's Castle equivalent) and the River Clun Monitoring Group. All three organisations join us in making the following comments:

'Nature Recovery Blueprint'

We note that the Group is finalising the project specification for a 'Nature Recovery Blueprint'. It will join a long list. We are aware of the following:

- Jacobs Babtie/Environment Agency (2006). River Clun Restoration Strategy. Unpublished report.
- Killeen, I.J. (2009). An assessment of the potential for the restoration of the freshwater pearl mussel *Margaritifera margaritifera* (L., 1758) population in the River Clun, Shropshire. Unpublished report to the Shropshire Hills AONB Partnership.
- Grieve, N. (2011). Development of an ecologically based vision for the River Teme SSSI. Unpublished Report.
- Atkins (2012). River Clun SSSI/SAC Restoration Strategy, Version 3b, March 2012. Unpublished Report for Natural England.
- Jacobs (2013). River Clun Restoration Strategy Supplementary Technical Report, April 2013.
- Environment Agency and Natural England (2014). River Clun SAC Nutrient Management Plan.
- Natural England (2014). Site Improvement Plan River Clun.
- Royal HaskoningDHV (2022). River Clun SAC Phosphate Mitigation Solutions for Residential Development.
- Natural England 2022 (revised 2024). River Clun Evidence Pack (Third edition). Technical Information Note 194.

But none of these has been followed by effective action at the scale and pace needed to reverse the river's decline. Indeed, it appears that compiling reports, strategies and blueprints is a displacement activity - an alternative to taking the action that is urgently needed.

'A number of activities are underway or completed'

Over the years a number of projects have sought to deliver benefits for the Clun, but none has been of a scale to make the step changes that are required. We acknowledge the valiant efforts that staff on the ground have made in the past and continue to make through activities such as those listed by the Group – Peatland Soil and Hydrological Mapping, Project FINCH, Wireless Water Quality Monitoring and Catchment Sensitive Farming. All are worthwhile, but the Group will be well aware that even taken together they will not make a material difference to the condition of the River Clun. As in the past, the combination of measures will not be effective quickly enough and at sufficient scale to effect the change that is required.

As the Group knows, source apportionment modelling indicates that rural land use is the principal contributor to the pollution of the Clun. Catchment Sensitive Farming seeks to address this issue and we acknowledge the very positive and ongoing endeavours of agency staff who work with many supportive landowners in striving to effect change. But CSF has been operating in the Clun Valley

since 2005. Very many millions of pounds have been invested through CSF, along with stewardship and special projects without any overall improvement in water quality. Are we really to expect that CSF is going to lead to a different outcome in the future?

We are pleased to note the positive work on phosphate removal undertaken by Severn Trent Water but are bound to point out that according to the Rivers Trust, in 2024, STW's sewer storm overflow at Bucknell spilled 29 times into the River Redlake for a total of 453.27 hours. What is being done to address this issue?

Community Engagement

The Liaison Group's response fails to address that part of our resolution that urges the Group to 'engage with the community'. The need to do so was acknowledged in 'The Way Forward', a section in the 'River Clun Nutrient Management Plan' of 2014, in which the Environment Agency and Natural England acknowledged that 'restoring the River Clun SAC will require collaborative efforts involving all catchment stakeholders'. The two agencies went on to state that 'a steering group will be established to oversee the implementation and review of the Nutrient Management Plan'.

It seems that no such 'steering group' was established, and it was not until 2021 that the Strategic Clun Liaison Group was formed. In its 'Position Statement' the Group identified 'the vital need for everyone to play their part' and committed to 'work alongside community members, Town and Parish Councils, landowners and others across the catchment'.

Four years on, this commitment remains to be met.

'River Clun Special Area of Conservation. Nutrient Management Plan', 2014

It is now more than 10 years since Natural England and the Environment Agency published this detailed, 269-page 'Nutrient Management Plan'. The Group will be well aware that it identified Phosphate, Nitrogen and Sediment (expressed as Suspended Solids) as the key parameters for which Favourable Condition targets needed to be set, and went on to define a short-term target for Phosphate to be met by 2019, and long-term Favourable Condition targets for Phosphate, Nitrogen and Sediment, which were to be met by 2027. These were in respect to the Special Area of Conservation, the 4.7km of the River Clun above its confluence with the Teme.

The Group will know that ten years on, the target levels are far from being met. However, for the benefit of others who may read this document, graphs are reproduced here showing the extent of the shortfall. On these graphs, blue circles are the levels found in monthly samples; short horizontal lines define the annual means.

The horizontal green line shown below the Environment Agency's graph for Nitrogen is the Favourable Condition target of 1.5 mg/l, a figure which is so far below current levels that it does not even appear on EA's graph. In the case of Phosphate, the short-term target of 0.02 mg/l is shown in amber, and the Favourable Condition target of 0.01 in green. From a high level in 2016, some progress seemed to have been made up to 2021 but since then average annual levels have been recorded which are well above the 2019 target, let alone the Favourable Condition target, which is due to be met just two years from now.

As to Sediment, it appears that the Environment Agency has no data available since a target of 10 mg/l (expressed as Suspended Solids) was set, and then exceeded, in 2014.

In case it should be thought that the situation upstream of the Special Area of Conservation is better, we reproduce here the Environment Agency's assessments of the Ecological Status of the eight reaches of the Clun and its tributaries which it surveys; these assessments have been made every three years since 2010. No reach has ever attained the top ranking of 'High' and the number assessed as 'Good' has declined over this time period from six down to one.

We can only conclude that over the 20-year period since its designation in 2005, our statutory agencies have failed in their duty to safeguard the River Clun Special Area of Conservation. The situation for the River Clun and its population of pearl mussels is now critical. Their numbers are so precariously low that they are at risk of extinction. This demands the most urgent action by the agencies responsible for their protection.

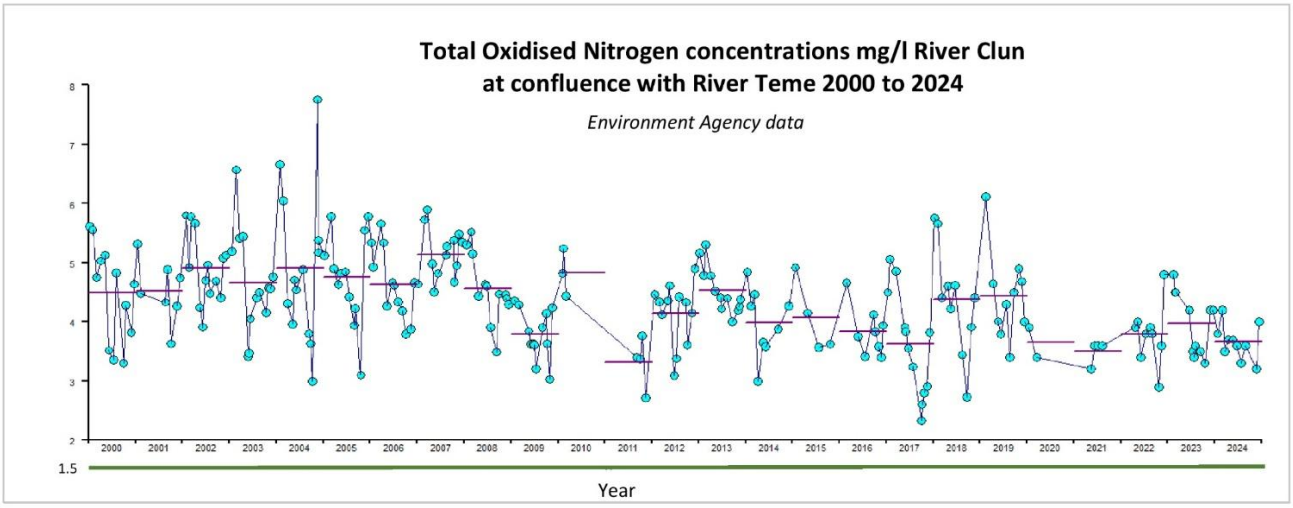
Where do we go from here?

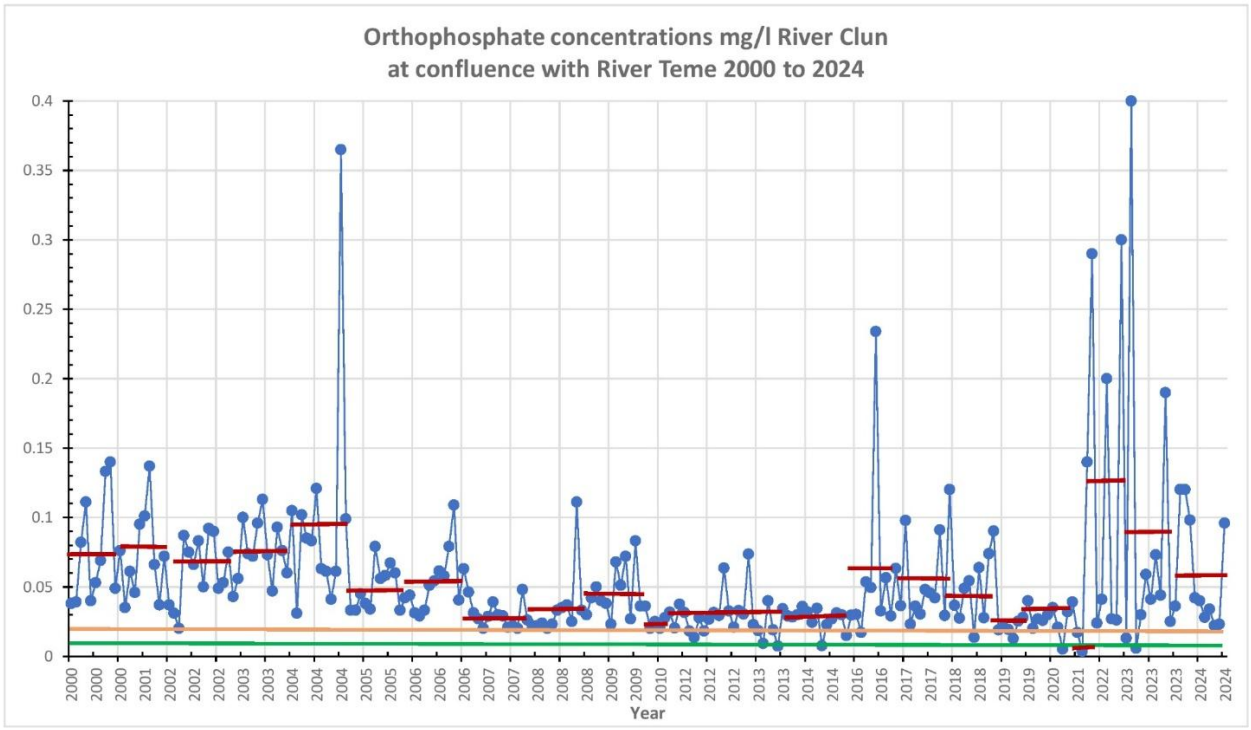
We will be copying this document to the MPs for the area, Ellie Chowns and Stuart Anderson, and will ask them to urge the CEOs of Natural England and the Environment Agency to make available the funding and staff necessary to restore the River Clun to Favourable Condition. We will also copy the Clun Town Council and Shropshire County Councillors Ruth Houghton and Sam Walmsley.

As to funding, we note below a series of Pearl Mussel projects running elsewhere. Why is there no such project on the Clun?

- Cumbria - £3.6 million for the River Kent catchment LIFE R4ever Kent https://r4everkent.co.uk/
- South Wales - £9million for the Four Rivers for LIFE Project https://naturalresources.wales/4Riversforlife?lang=en
- North Wales – Afon Eden Pearl Mussel Project https://northwalesriverstrust.org/freshwaterpearlmusselproject
- UK wide - €4,617,398 Pearls in Peril - securing the future of the freshwater pearl mussel in Great Britain (Completed 2017) https://www.nature.scot/professional-advice/protected-areas-and-species/protected-species/life-nature-and-biodiversity-projects/pearls-peril
- Ireland – €10 million The Pearl Mussel Project (completed 2023) https://www.pearlmusselproject.ie/

We, and our partner organisations, would welcome a face-to-face meeting with the Liaison Group to discuss these observations and we hope that this can be arranged in the near future please. But we recognise that we are just one element of the community of farmers, land managers, conservationists and citizens which you need to bring together and inspire in a common endeavour to restore the River Clun.





The variability in the statement of years on the X axis is due to the differences in the number of samples taken annually

Year	River Clun Source to confluence Folly Brook	Folly Brook	River Clun Confluence Folly Brook to confluence River Unk	River Unk	River Clun Confluence River Unk to confluence River Teme	Snakescroft Brook	River Kemp	River Redlake
2010	Good	Good	Good	Good	Good	No data	Good	Moderate
2013	Good	Good	Good	Moderate	Moderate	Good	Poor	Good
2016	Moderate	Good	Good	Moderate	Moderate	Poor	Poor	Moderate
2019	Moderate	Good	Good	Good	Moderate	Moderate	Moderate	Moderate
2022	Moderate	Moderate	Good	Moderate	Moderate	Moderate	Moderate	Moderate