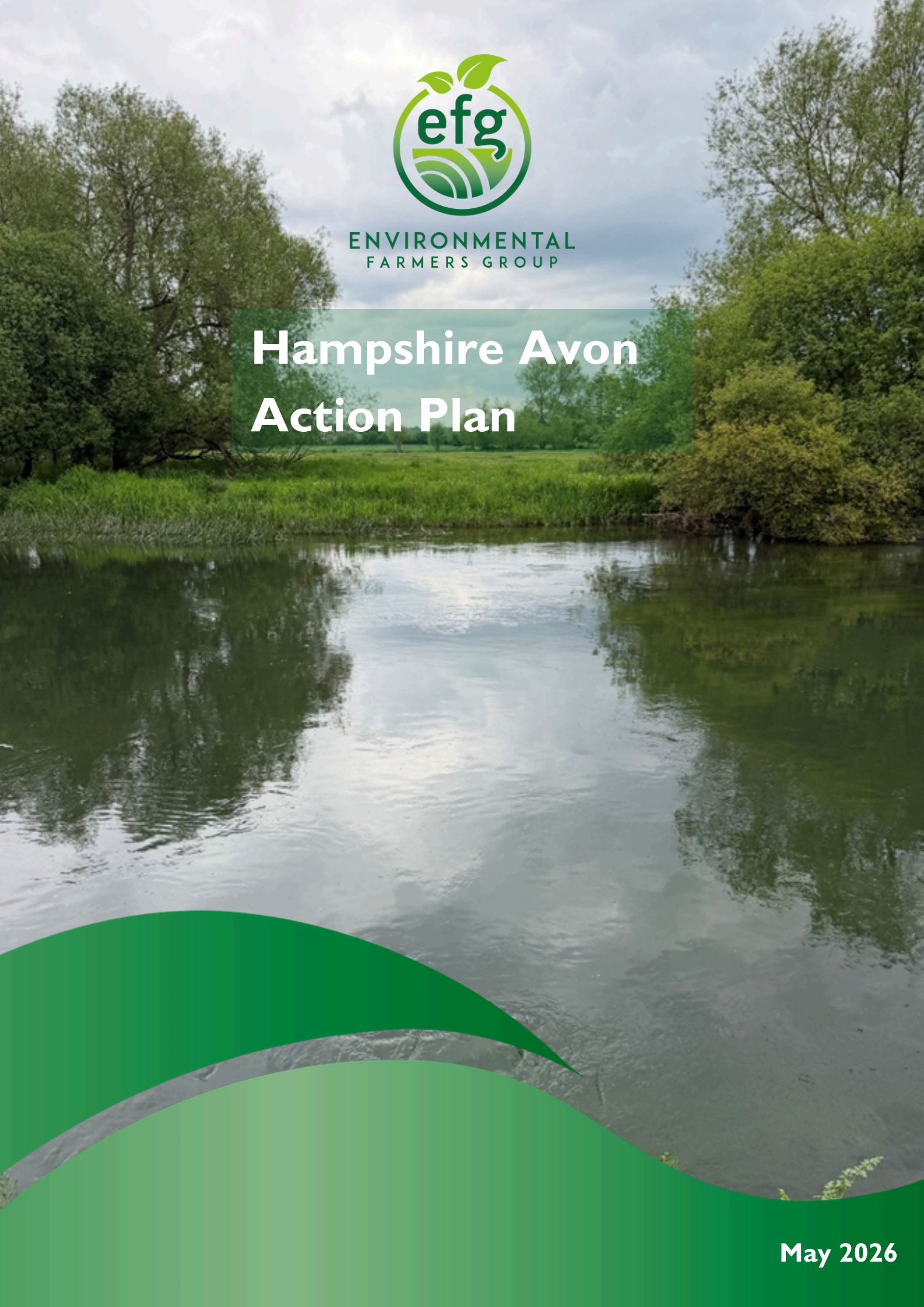


ENVIRONMENTAL FARMERS GROUP

Hampshire Avon Action Plan

May 2026

Introduction

To all farmers in the Hampshire Avon Catchment, the Environment Agency's Diffuse Water Pollution Plan (DWPP) has landed on your desks.

Whether you farm in the valleys of the Avon, Wylye, Bourne, Till, Nadder, Ebble or anywhere in the catchment, the implications for your farming businesses are profound, possibly positive in some ways, more likely negative and certainly challenging.

Once you have had a chance to digest the DWPP document and begun to understand how this 8-year regulatory process will be run, you need to ask yourself a question –

Do I want to go with the flow, let the regulatory process run its course and do my best to manage the consequences?

or

Do I also want to be proactive, to work with my neighbours, to take control of the central issue? "How is my farming really affecting the river and what can I do about it to ensure clean water and vibrant wildlife?"

If the answer to that latter question is **"Yes!"** then come with us. Instead of being seen as the problem, be part of the solution and…

READ ON!...

How should Avon catchment farmers react and what can they do to get the best outcome for their business?

HAMPSHIRE AVON DWPP – THE REGULATORY PROCESS

All farmers in the Hampshire Avon catchment should have already received a letter from the EA. This letter will inform them that they are subject to a new regulatory requirement to reduce the amount of phosphate, calculated by EA models, that they as farmers contribute to the river catchment by 47% from a 2009 base (also calculated by EA models). Farmers are invited to apply a new 'modelling tool' which is spreadsheet-based called the Phosphate Loss Tool (PLT) on a field-by-field basis. This will estimate their phosphate losses into water, help them make management decisions to reduce these on a gradual basis – called a glide path – with the aim of bringing their businesses into line with the overall target for the catchment by 2033. Enforcement can be part of this process if the EA deems it necessary.

Farmers will also be invited to join a group which will offer them some advantages and support through this regulatory process. The NFU, EFG and all the local Farmer Clusters are involved in setting this up. Delivering the PLT via the group will protect individual businesses from EA inspection to a degree because they will be deemed to be low risk. Those who do not join the group will be treated as higher risk by the EA. Those who choose not to make an annual return with the PLT will have the highest risk rating and be treated accordingly.

WHY IS THE DWPP THOUGHT NECESSARY?

Phosphate levels in the Avon catchment are high in comparison to the standard set by the Water Framework Directive 2003 (WFD). The Avon catchment rivers have a highly protected environmental status, both SAC (Special Area for Conservation) and SSSI (Site of Special Scientific Interest). Legal action taken by a group of environmental charities (often called eNGOs) and the judgement obtained by them has forced the government, through its statutory regulators EA and NE, to ensure that the correct standards are imposed. The WFD standard for phosphate is 0.05mg/litre, to be multiplied by the total annual flow of the river system as measured at Knapp Mill, Christchurch, giving a maximum total permissible phosphate load in the river per annum (kg or tonnes). The DWPP shares the meeting of this target out between sources, of which agriculture is one. The others are industry (mainly fish farms), sewage treatment works, rural septic tanks, roads and urban.

It is important to recognise that the objective of the regulatory system that stems from the WFD is to achieve a high river ecological status, the best possible biodiversity for a chalkstream which, of course, we all want. Phosphate levels are treated as a proxy in achieving this by the WFD. The weakness of this approach is that it is not a very good proxy and other factors such as sediment, flow rate, river profile (naturally shallow and fast-running or deep, slow and canalised), shading and a multitude of other chemical and physical 'stressors' are also important to a greater or lesser extent.

Nitrate is relatively unimportant to ecological status. The DWPP's focus on nitrate is limited to drinking water standards and only for those businesses within the control zones around the two public boreholes used for drinking water (near Fonthill Bishop and Little Durnford). These farming businesses will have to complete a Nitrate Leaching Tool (NLT) in addition to the PLT, but phosphate remains the prime focus of the DWPP.

WHAT ARE THE POTENTIAL IMPACTS ON FARMING BUSINESSES?

Phosphate is a key plant nutrient in arable systems and a key potential pollutant from arable fields (carried mainly in soil run-off) and livestock units (mainly from slurry and manure). The DWPP is model based, both in the way it apportions the share of the pollution load to different sources (agriculture, urban, sewage treatment plants, septic tanks etc.) and through the use of the PLT. Although these models are thoroughly tested and are based on the best available scientific understanding, they may struggle to take into account the precise circumstances of individual fields and farms or indeed the contribution of agriculture overall. Importantly, it is suggested that fields with a P index greater than 1 are high risk. Successful arable operations that have, through good husbandry, built up indices of 2, 3 or 4 may find themselves under a pressure that threatens profitability. Similarly, livestock operations may find their otherwise efficient systems challenged, slurry handling impacted and stocking rates and feed inputs under review.

HOW CAN FARMERS MAKE SURE THAT THE TRUE SITUATION ON THEIR OWN FARMS, FIELDS AND UNITS, AS OPPOSED TO THE SITUATION ESTIMATED BY THE PLT, IS PROPERLY UNDERSTOOD SO THAT THEY CAN TAKE THE CORRECT ACTION IN THE INTERESTS OF THEIR BUSINESS?

Environmental Farmers Group (EFG) is a farmer co-operative in the Hampshire Avon catchment and is on your side. Its twin aims are to improve the natural environment in the catchment and to provide opportunities for farmers to trade the natural capital thereby generated. Set up just over four years ago in the Hampshire Avon, it has now spread into 18 other catchments across England. It has over 100 members in the Avon catchment at the present time, works with and through the Farmer Clusters in the catchment and it is playing an active role in the farming industry response to the recently published HADWPP.

To improve the freshwater natural environment, over the past two years, we have been setting up farmer-controlled laboratories to measure N, P and conduct soil sediment 'fingerprinting' both in tributaries and the main river. Scientific support has come from GWCT and particularly from Rothamsted Research who have provided capital funding for water-testing equipment. The data generated will be a vital support for the delivery of our recently published Environmental Transition Plan, a whole catchment conservation plan for the Hampshire Avon based on the 40 separate Water Bodies in the Avon catchment which are the foundation of the Environment Agency's regulatory approach.



SO...

Farmers have a choice. They can go along with the DWPP, apply the PLT and manage their businesses within the constraints set out by it and the regulator OR they can ignore the whole thing and take the legal consequences when the regulator comes to call OR while applying the PLT they can take power into their own hands, take ownership of the fundamental problem - the health of their chalk streams - and join with their fellow farmers in delivering the EFG's Environmental Transition Plan.

What does 'taking ownership' mean? On their local stretch (their water body) this means monitoring N, P and sediment ('fingerprinting' to identify its source), measuring the biodiversity (is it good or could it be better?) taking control through their Farmer Cluster from the bottom up. It is open to doubt whether the regulator's drive to reduce phosphate in the river will result in a significant net benefit to biodiversity or ecological status but a farmer-led action plan, based on real data gathered in real time, could do just that. The diagram below shows how.

And that's not just data from the river itself. Farmers can use their laboratories to measure other things like "What's flowing down that ditch outside the farmyard?", "What's running out of that field gate when it rains?", "What's in the spring water that rises further up the valley?", and "What might be coming out of that pair of septic tanks below the farm cottages?". All of this is vital information that can build up a picture of who and what is really responsible for the state of the river and what we as farmers are going to do about it.

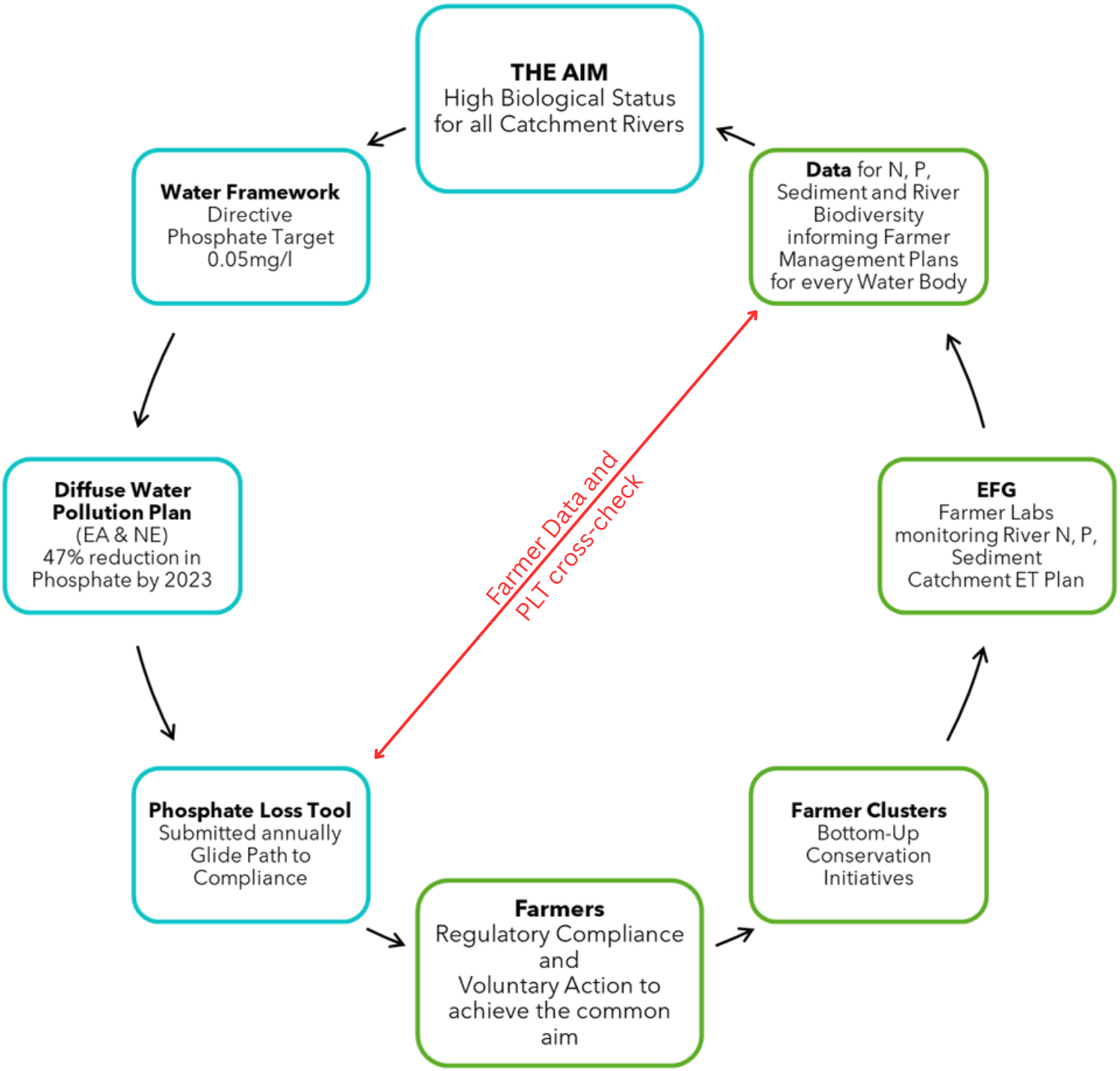
So, are you happy to rest on the receiving end of an inevitable regulatory process or would you rather take an active role, generating data that may challenge the models' conclusions or point the way to a better solution, one that actually improves the state of our chalk streams, builds up biodiversity, delivers cleaner water and goes hand in hand with profitable, productive agriculture? If you would, then please join EFG's Environmental Transition Plan and the Farmer Cluster covering your water body and be a part of it.

ACTIONS:

If you want to join your fellow farmers in taking the initiative…

- If you're not already an EFG member, go to the EFG website and send in an Expression of Interest (EOI). This will be enough to connect you to the Plan. No immediate commitment about membership is required. You can suck it and see.
- If you are in a Farmer Cluster, that is all you need to do; the rest will come via your facilitator.
- If you are not already a Farmer Cluster member, then please also make contact with the facilitator of your nearest or most appropriate. You don't have to join if you don't want to, but the Clusters will play a key role in both the delivery of the PLT and of EFG's ETP.
- See next page for Farmer Cluster map and contact details (Page 8)
- Find out where your nearest farmer water testing lab is. Consider joining the volunteer effort so your farm can be included in the places being studied.
- Talk to your neighbours. Identify key river issues that you might like to tackle together.
- Start to identify your key vulnerabilities to phosphate run-off. Think about what you know, what you don't know and what you need to know.
- Remember, DATA IS KING. With it you can change the course of events. Without it, you just have to take what you get.

Diagram


THE AIM
High Biological Status for all Catchment Rivers
Water Framework
Directive
Phosphate Target
0.05mg/l
Data for N, P, Sediment and River Biodiversity informing Farmer Management Plans for every Water Body
Diffuse Water Pollution Plan
(EA & NE)
47% reduction in Phosphate by 2023
EFG
Farmer Labs monitoring River N, P, Sediment
Catchment ET Plan
Farmer Data and PLT cross-check
Phosphate Loss Tool
Submitted annually
Glide Path to Compliance
Farmer Clusters
Bottom-Up Conservation Initiatives
Farmers
Regulatory Compliance and
Voluntary Action to achieve the common aim

Farmer Cluster Information

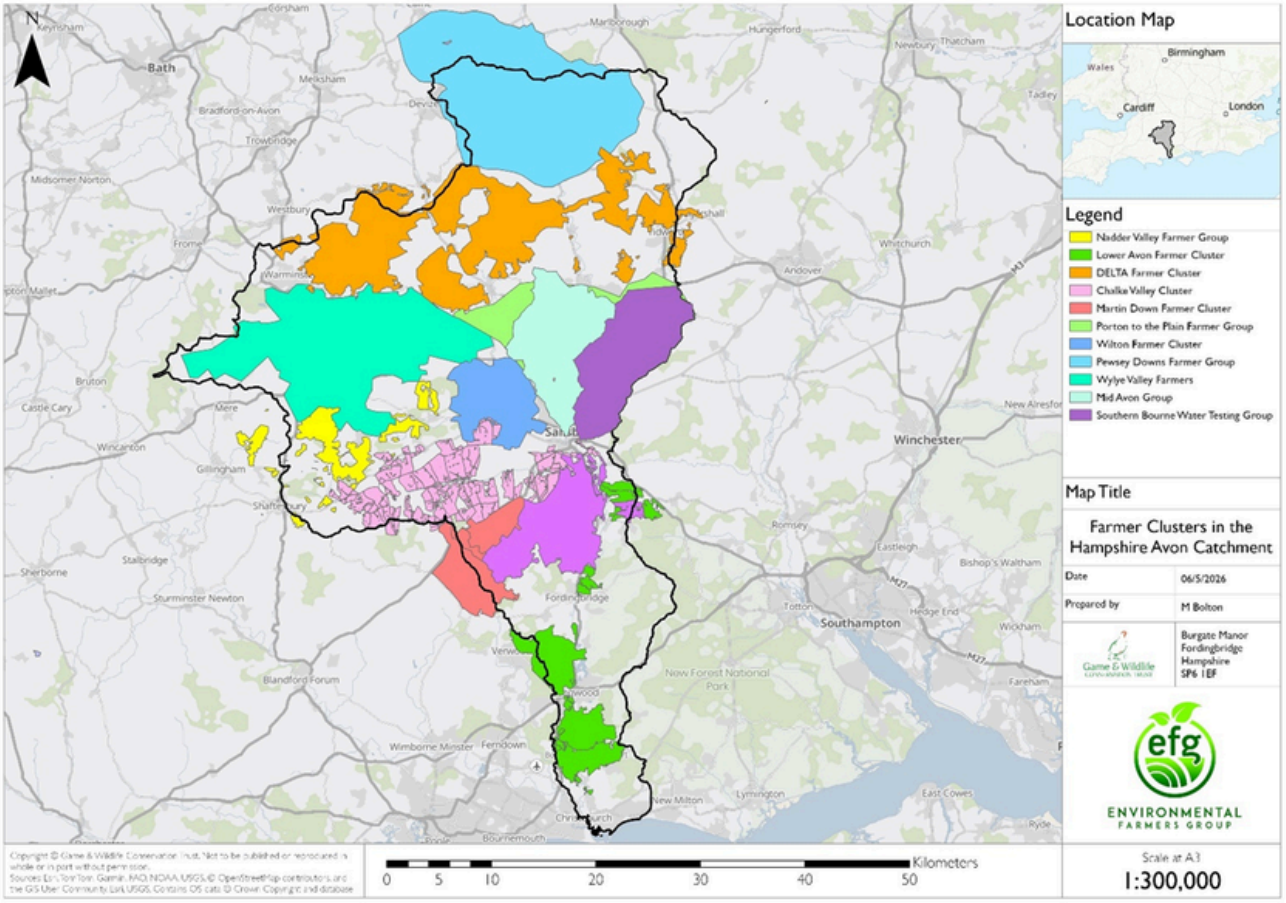


Figure 1: Farmer Cluster Map - Hampshire Avon

Table 1: Farmer Cluster Facilitator Information

Cluster Name	Facilitator	Contact Details
Nadder Valley Farmer Group	Tracy Adams	tracy9adams@outlook.com
Lower Avon Farmer Cluster	Lizzie Grayshon	lgrayshon@gwct.org.uk
DELTA Farmer Cluster	Jemma Batten	jemma.bat@btinternet.com
Chalke Valley Cluster	Simon Smart	simon@slme.co.uk
Martin Down	Megan Lock	mlock@gwct.org.uk
Porton to the Plain Farmer Group	Simon Smart	simon@slme.co.uk
Wilton Farmer Group	Simon Smart	simon@slme.co.uk
Pewsey Downs Farmer Group	Simon Smart	simon@slme.co.uk
Wylye Valley Farmers	Robin Leech	robin@jmstratton.co.uk
Mid Avon Group	Simon Smart	simon@slme.co.uk
Southern Bourne Water Testing Group	Simon Smart	simon@slme.co.uk