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Dove Local Environment Agency Plan

STATEMENT OF PUBLIC CONSULTATION

Summary of Public Consultation Responses

June 1999 – August 1999



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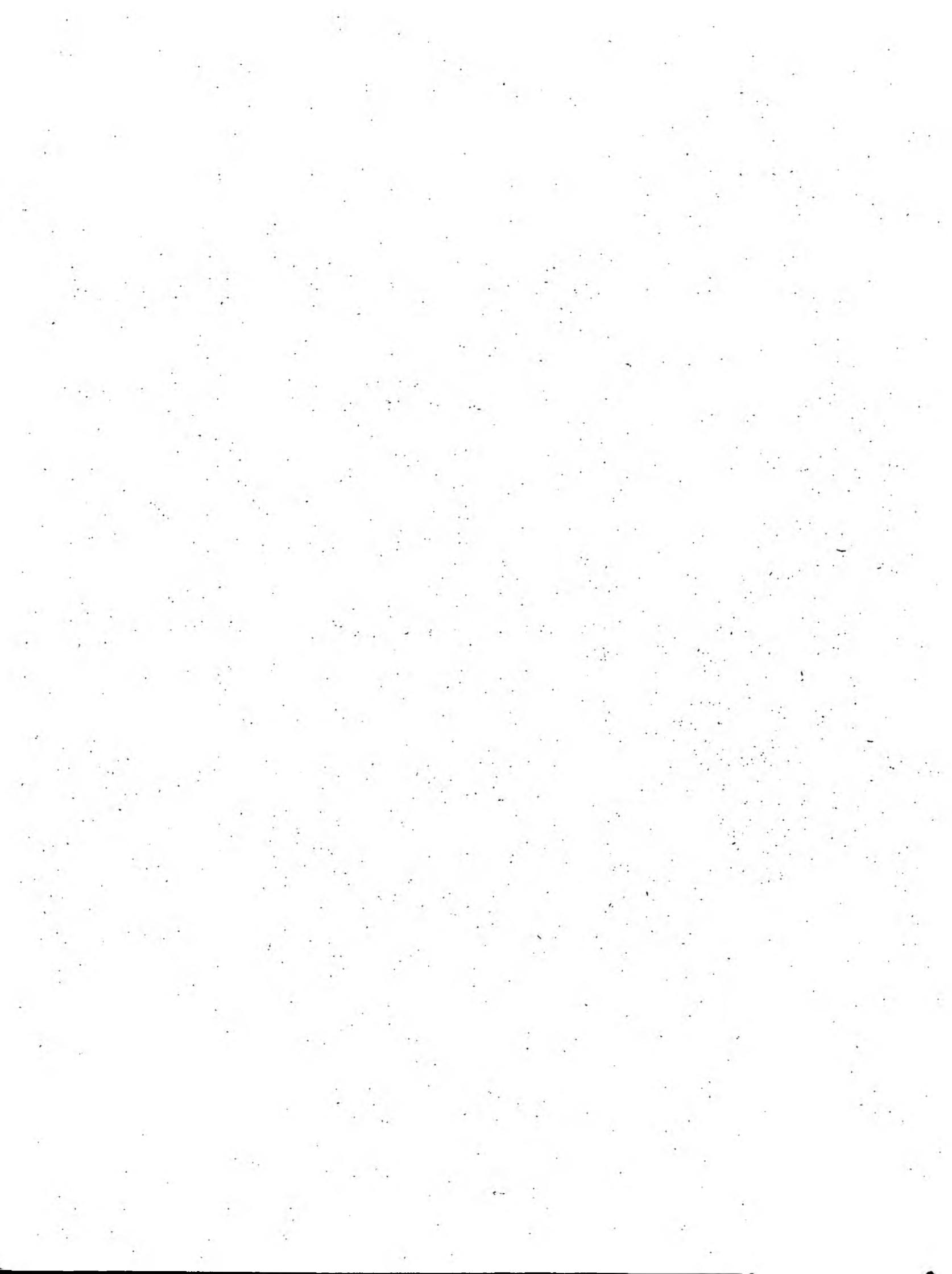
Dove LEAP Documents :~

Dove Consultation Draft Report	May 1999
Dove Statement of Public Consultation	March 2000
Dove Action Plan	March 2000

These documents are available free of charge from the Agency's Upper Trent office. If you wish to obtain any copies please contact:

LEAP Planner
Environment Agency
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Wellington Crescent
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1 Review of the Consultation Process

1.1 Background

The Dove Leap Consultation Report was launched for public consultation by the Environment Agency on 4 May 1999. The consultation report and summary leaflets were given to individuals and organisations with the opportunity to comment on the report and on local environmental problems. Written responses were received in a number of formats, including letters, faxes and questionnaires.

1.2 Informal Consultation

In November 1998 the Agency wrote to 166 key groups, local authorities and other representative bodies asking for comments on the Agency's initial list of issues and problems affecting the environment in the area that they considered warranted further action. This consultation was carried out as an information gathering exercise to highlight the issues that should be included within the LEAP. In total 37 replies were received and all comments were considered and where appropriate incorporated into the consultation report.

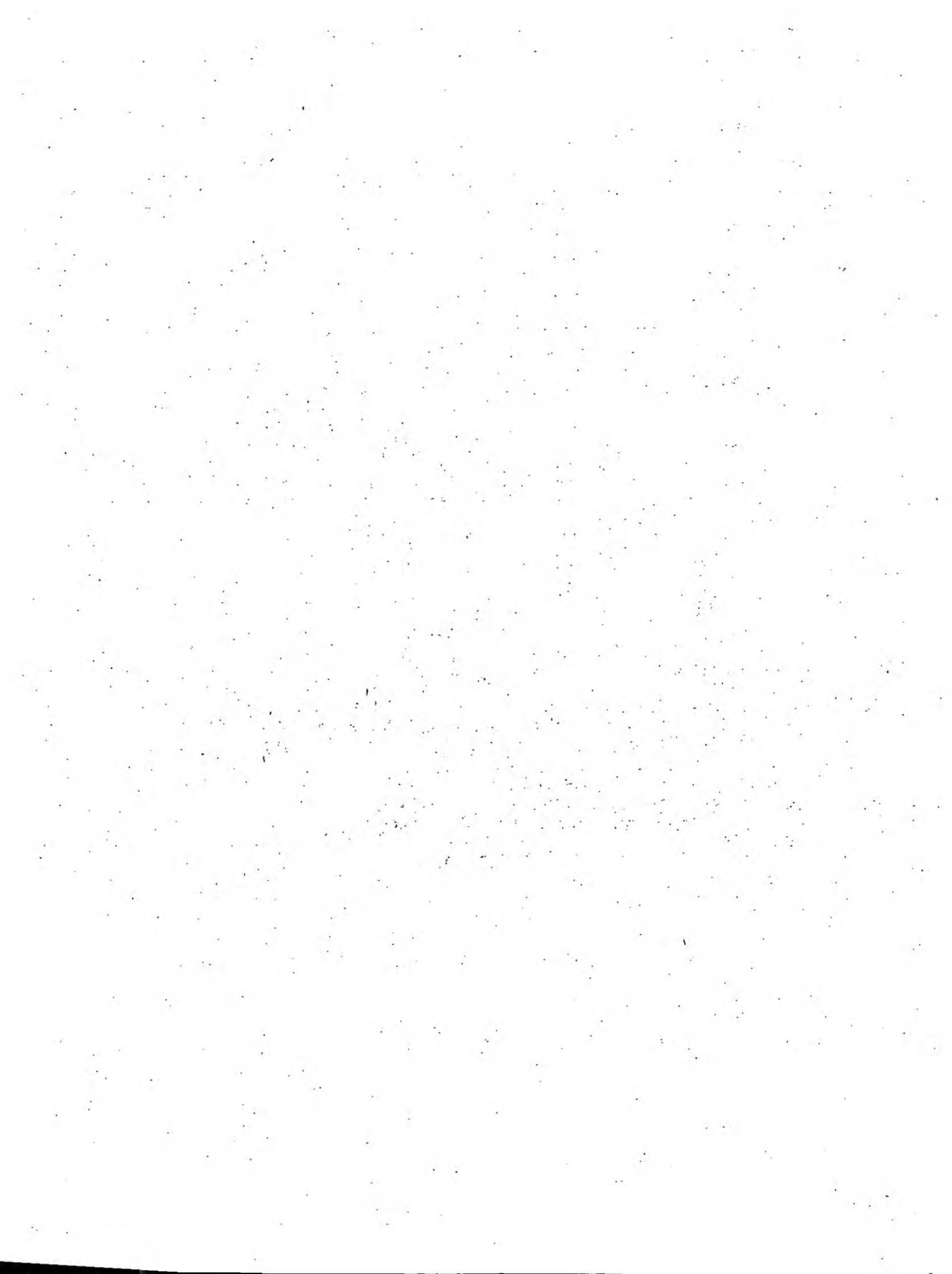
In addition a sub-group of the Area Environmental Group (AEG) made a valuable contribution to the development of the Consultation Report. The AEG is a local advisory committee made up of individuals who live or work in the Upper Trent area and take a particular interest in LEAPs. The AEG sub-group was formed to consider the LEAP issues and contribute to the development of the consultation report and subsequent action plan. The sub-group consisted of :-

Mr Robert Ball	Local Authority
Dr Phillip Bennion	Farming
Dr Peter Bottomley	Fisheries
Mr Frank Gribble	Nature Conservation

1.3 Consultation Launch

The Dove LEAP Consultation Report was launched at Tittesworth Reservoir on the 4 May 1999. The launch marked the start of a three month consultation period which ended on the 13 August 1999. Promotion of the document was by:

- Talks to both public and private organisations.
- Display boards about the LEAP at local library's, and Town Hall's.
- Attending a number of shows, see appendix for further details.
- Press releases.



2 Summary of Responses

2.1 Responses Received

A total of 53 written responses to the consultation exercise were received ~ 26 letters and 27 questionnaires. The response was encouraging, particularly as those responses received represented a wide cross section of interests. All letters and questionnaires were acknowledged and where needed a detailed response was sent.

All comments have now been considered and where appropriate and practicable included in the Action Plan. During the consultation process and via responses, we received many helpful and welcome suggestions, errors and omissions have also been acknowledged and these are summarised at the end of this report. Above all it is encouraging that so many organisations have expressed a desire to work in partnership to achieve our common objectives.

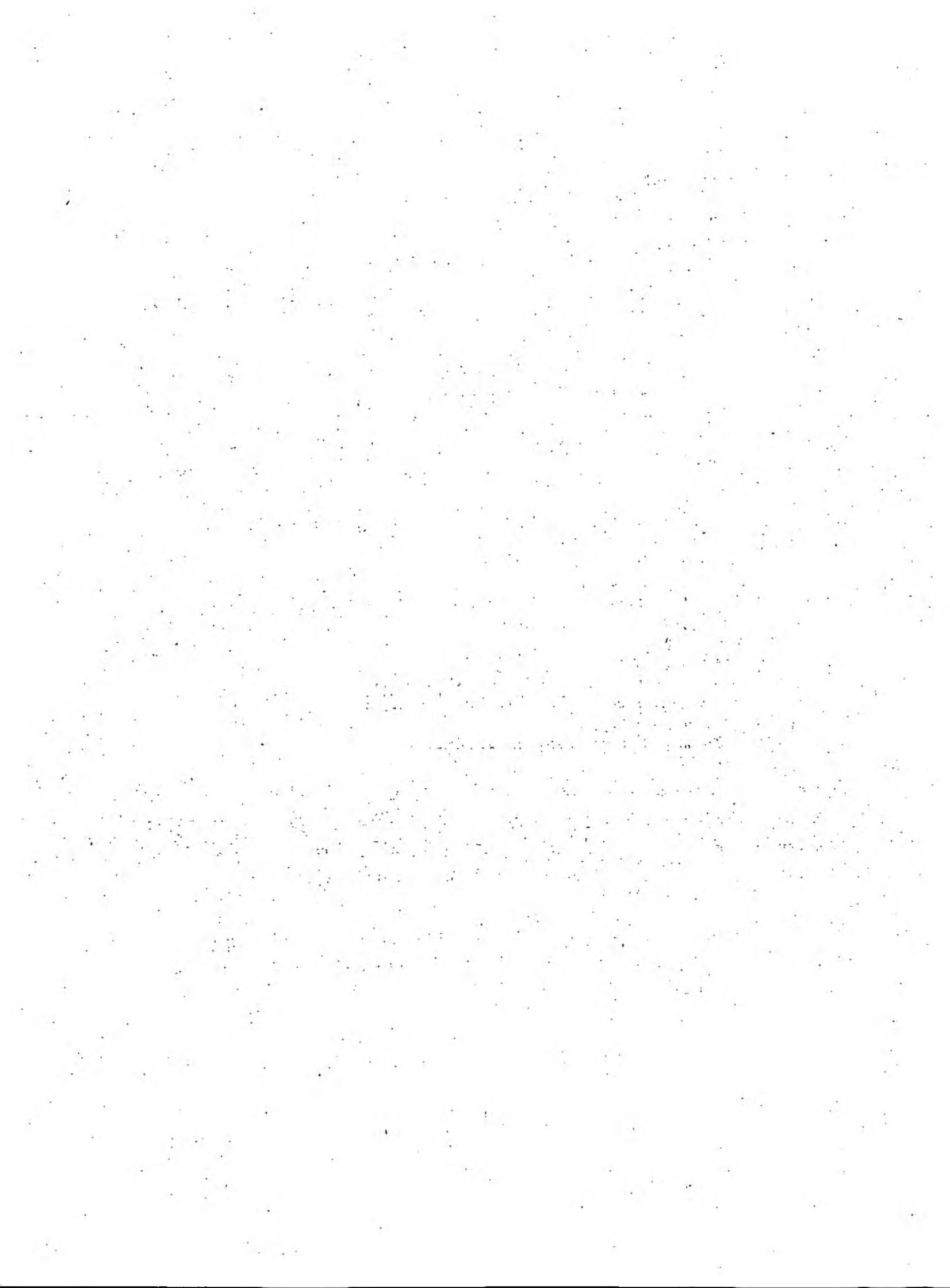
The consultation process has given the Agency a more comprehensive understanding of the issues and options presented in the LEAP and of the public's concern in the area. It was very clear from the responses received that the issues of Landscape and Ecology in the Dove catchment are key to both local residents and visitors to the area, alongside sustainable riverbank management and biodiversity. Whilst this is a reflection of the predominantly rural nature of the LEAP area, such a response reinforces the importance of conservation measures. The issues have not been prioritised as the Agency considers the delivery of each issue to be equally as important.

The letters and questionnaires raised a number of potential new issues which included:

- The potential of hydro, solar and wind power.
- Commercial water extraction.
- Reducing water consumption.
- Green Corridors.
- Increased water levels.
- Publicly owned land.
- Flood risk at Marchington.
- Constant water supply to Caldon Canal from Rudyard Reservoir.
- Waste Management Plans.
- Mineral extraction and its environmental impacts.

The Agency has considered the responses received and the new issues raised. No new issues have been incorporated in to the Dove LEAP Action Plan as they are either already part of the Agency's everyday work or the Agency has limited responsibility or funding available for addressing such issues. Others, such as land ownership issues, are outside the remit of the Agency.

Changes to existing issues are identified in the activity tables in Section 4 of the Action Plan. The plan reflects a balance between the opinions expressed and the need to ensure a feasible and workable plan.



Organisation/ Individual	Section	Comments	Response
Anon	General	<p>What funds are available for emergencies.</p> <p>How are finances allocated to each area within the Dove Catchment.</p> <p>What information is available about projects undertaken by the Agency.</p> <p>Could site visits be arranged for interested parties.</p> <p>Is there a published list of prosecutions brought by the Agency.</p>	<p>There is no specific fund for emergencies as they are dealt with on a case by case basis. Where possible the costs are recouped from the polluter.</p> <p>Area funding is allocated on a project basis.</p> <p>There are numerous Agency documents available, predominantly LEAP plans, corporate and business plans, which outline the wide range of Agency projects.</p> <p>The Agency does not own any land within the Dove catchment, thus site visits require landowners consent.</p> <p>The Agency produces a "Hall of Shame" prosecutions list available on its web site and Area Environment Group Enforcement Reports and Regional Environmental Protection Advisory Committee.</p>
Chairman of Derbyshire Bat Conservation Group	<p>General</p> <p>Issue 15</p> <p>Issue 7</p>	<p>All the issues raised are important.</p> <p>I am concerned about bat conservation.</p> <p>I have concerns about the effect of the use of pesticides and herbicides and the changes in agricultural land use. Concern for the conservation of bat habitats especially flora, hedgerows, tree lines and watercourses for commuting and feeding.</p>	<p>We have a duty to promote conservation, which we carry out through regulation where possible and by seeking to develop best practice and influencing others.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Anon	General	Fascinating document, which should lead to an improved situation.	Your comment is welcomed.
Mr M Hubbard British Canoe Union West Midlands	General Issue 7 Issue 12.2	<p>No mention of Canoeing and Sailing. Canoeing issues and your policy for canoeing are conspicuous by their absence from the whole PLAN. There is no issue "Opportunities for Amenity, Recreation and Navigation", as there is in most other LEAPS. Issue 7 does not really cover it.</p> <p>Issue 7 acknowledges page 41 "the high number of visitors attracted each year" and "increased opportunities for recreation". Your policy INTEGRATED RIVER-BASIN MANAGEMENT clearly states:- Pages 47 & vi "Ensure that all waters are of sustainable quality for all different uses".</p> <p>Without canoeing it is not integrated.</p> <p>Para 2 The terms "Amenity" and "Navigation" are often interpreted in a narrow sense. I wish to bring to your attention that we should be considered as part of the wider sense.</p>	<p>Canoeing does not feature in this LEAP as legally canoeing can only be carried out with the river bank owners permission except where there is a right of navigation for canoes. This is not the case on the Dove.</p> <p>Integrated river bank management does cover all legal uses of the river. The Agency supports the making of access agreements between canoe clubs and river bank owners to achieve shared use of rivers.</p> <p>The terms amenity and navigation in the Dove catchment are quite separate terms. The only right of navigation in the plan area is the Caldon Canal, however there is no right for canoeing.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Mr M Hubbard	Issue 13	It is interesting that as part of River Bank Management you have produced two leaflets "Living on the Edge" and "Sustainable River Bank Management". Do they consider the needs of disabled people to access the river?	These leaflets have been designed for areas well away from access where there are problems with erosion. At these sites there is no requirement for any access by able bodied or disabled people. Where the Agency is promoting access to the river bank it does take account of the needs of disabled people.
	Issue 14	Canoeists need to know river levels to assess the level of difficulty of the water. This is of paramount importance when taking youngsters in locoparentis. Advanced information is always sought when available to prevent unnecessary journeys and disappointment when the river is unsuitable. What gauge information could be made available in this catchment by adding to rivercall line or publishing on a web page? There is a proposed Web project in the West Midlands which could grow into national coverage.	Rivercall already gives information on the river levels of the River Dove. Do you require more information on this; if so what information? Putting the Rivercall information onto the internet and keeping it up to date would require more manpower than we have available.
	Issue 19	Floods and Plans for Evacuation: If a register of boats was drawn up this is one way we could help the community. I know there are quite a lot of large Canadian canoes in this area. I do not know exactly where they are. We could find out from Burton Canoe Club if individuals are prepared to co-operate in this sort of arrangement. Availability of river gauge information to the public, another reason for Issue 14 above.	A starting point for this would be as you suggest to find out from the canoe clubs if they are willing to co-operate in this. This suggestion can then possibly be taken further when support for this action is known. Your suggestions are welcomed.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Carel Quaife Access & Development Manager British Canoe Union</p>	<p>General</p>	<p>The British Canoe Union (BCU) welcomes the opportunity to comment on the Dove LEAP. The basic requirement for canoeing is water space. Success in seeking access to water through agreement with riparian interests is very limited. Canoeists wish to make progress towards achieving a reasonable and equitable share of the limited waterway resources. The BCU urges you to include policies in your plan whereby you will:</p> <ul style="list-style-type: none"> - Actively encourage the making of agreements to enable canoeing to take place on physically canoeable waterways and - Act to bring together parties to potential agreements and will, if required, act as facilitator. <p>The lower stretches of the Dove and parts of the Churnet are physically canoeable and canoeists seek more opportunities to canoe these and other waters. We consider that canoeing should be included in water sports in the catchment.</p> <p>We have indicated that responsible canoeing is an environmentally friendly activity. It is the policy of the BCU to provide information to members about conserving, respecting and enjoying the natural environment within which they canoe.</p>	<p>The difficulty in obtaining access agreements for canoeing lies in 2 factors:</p> <ol style="list-style-type: none"> (1) Fishermen have usually found large sums of money to secure fishing rights while canoeists have a policy of returning to pay for access. In such circumstances landowners and angling clubs are unlikely to see shared use of waterways as reasonable or equitable. (2) Where a right to use canoes is established then the waterway becomes available for <u>all</u> craft including eg jet skiers. This is not popular with the public or landowners. <p>The Agency are always willing to act as facilitators for access agreement and have tried to do so on many waterways. It is however very difficult to reconcile conflicting viewpoints.</p> <p>The lower Dove is the subject of an access agreement between canoeists and the angling club.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Cllr Stephen A Ellis Continued	Issue 16	Please outline the current situation with regard to the impact of sewage and trade effluents upon the middle reaches of the Rivers Churnet and Tean.	On the River Tean, Checkley sewage treatment works discharges approximately 1 kilometre upstream of Fole. The discharge has a consented volume of 18.6 Mld which compares to a low flow in the river upstream of 4.9 Mld. The consent conditions for the sewage works were inherited from Severn Trent Water Authority. A need was identified for a tighter long term consent to improve the River Tean's downstream quality. This in turn identified a need for additional sewage treatment capacity at Checkley sewage treatment works. The necessary expenditure to achieve the required improvements was identified by Severn Trent Water Ltd in co-operation with the Agency and its predecessor, the National Rivers Authority through its Asset Management Planning (AMP). The improvement works are now completed and the river quality downstream has improved considerably. The improvements will have beneficial effects on the River Quality Assessment and on the River Tean fishery overall. The improvement will be maintained by enforcement of the new tighter consent in respect of Checkley sewage treatment works.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Cllr Stephen A Ellis	Issue 16 Continued		The River Churnet was previously affected by coloured effluents from the dyeing industries of Leek and by poor quality effluents from Severn Trent's sewage works at Leek and Cheddleton. The need for investment was once again identified through Severn Trent's Asset Management Planning process. Improvements have been completed at Leek and Cheddleton including colour treatment at Leek. River quality downstream has improved considerably and this improvement is expected to be sustained.
Dr H Wood Clean Rivers Trust	General	A good report.	Your comment is welcomed.
Mr J Connor Chairman Clifton Parish Council	New Issue	The extraction of water on a commercial basis by such as "Nestle" and "Perrier" at Buxton should be monitored and if necessary controlled as there is evidence that extraction is having some effect in the Ashbourne area on stream levels, availability for farming purposes and water shelf in the ground.	The abstractions named are licensed by the Environment Agency under Section 24 of the Water Resources Act 1991, although the abstraction in Buxton is not within the Dove LEAP area. Abstractors are visited by the Agency enforcement staff to ensure that they comply with the terms and conditions of their licences. Before any increases to the volume of water abstracted, or the location that the water is abstracted from its altered, all applicants are required to undertake extensive water features surveys and borehole pumping tests, to ensure that there are no adverse effects on the environment, to the baseflow to surface water features, or other lawful water users. Pumping tests undertaken so far in the Ashbourne area

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Mr J Connor Chairman Clifton Parish Council Continued</p>	<p>New Issue Continued</p>		<p>would appear to indicate that surface water features were not affected by the pumping of the underlying Sherwood Sandstone, by the large scale commercial abstractions named, although tests are still ongoing to ensure this hypothesis is correct. Calculations undertaken by the Agency show that there are sufficient resources available within the immediate Ashbourne area for other potential abstractors such as the farming community, provided that there are no potential adverse effects.</p> <p>During drier summer months, or within period of decreased rainfall, overall flows are reduced. It must be appreciated that reduction in surface flows within drier summer months, area result of the natural reduction in baseflow contributions from both superficial and deep aquifers, and the seasonal reduction in rainfall. The subsequent reduced surface run-off, are a common feature country-wide, and are not necessarily because of increased abstraction from a aquifer system.</p> <p>I do not consider a new issue is required. Nestle and Perrier have "abstraction licences" and will be regularly monitored by Water Resources staff.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Tony Pike Countryside Officer The Countryside Agency (CA)</p>	General	<p>The Countryside Agency (CA) wishes to work alongside the Environment Agency (Agency) on the inclusion of countryside character at all stages of the LEAPs process. Our Countryside Character initiative has identified character areas which provide the starting point for promoting local distinctiveness and encouraging local communities to take pride in their own environment. The sections of particular relevance include improving countryside recreation and the opportunities for enhancing rivers close to towns.</p>	<p>We support the Countryside Agency's move towards "countryside character", but are uncertain how far the Agency can influence this aspect of land use planning except for the promotion and protection of river corridors, protection for flood plains and support for biodiversity.</p>
	Issue 7	<p>We urge that landscape character be considered within all aspects of the Agency's work and issues identified in the report. That opportunities are taken to conserve and enhance natural beauty as defined in the regulatory framework (Environment Act 1995).</p>	<p>We do take these into account. We also commission surveys to assist in our work, where the information is not already available and want to develop partnerships with others where appropriate.</p>
	Issue 7.2	<p>The CA is concerned that pressures for development in the catchment could have significant impacts on the landscape character and access.</p> <p>New development on flood plain areas should be resisted and any redevelopment of river or canal-side areas should be planned sensitively with water and landscape features. Enhanced river or canal corridors whether through appropriate development or corridor rehabilitation could contribute to economic regeneration.</p>	<p>There are flood plain protection policies in the existing adopted Staffordshire Structure Plan (1991) and the recently adopted East Staffordshire Local Plan (1999). The Agency has also stressed the importance of such policies in the Staffordshire and Stoke on Trent Structure Plan and made representations at the recent examination in public.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Tony Pike Countryside Officer The Countryside Agency Continued</p>	<p>Issue 7.2 Continued</p>		<p>The Agency always resists built developments within the flood plain and, where developments are allowed alongside rivers the Agency always seeks enhancement and mitigation measures.</p> <p>We agree that where riverside or canal side development is permitted it should be planned sensitively and enhanced river/canal corridors can aid economic regeneration.</p>
	<p>Issue 7.3</p>	<p>The CA is concerned that there is a loss of integration within the landscape. There is a need to reconnect the river within the landscape, for example the re-establishment of flood plain habitats as a key landscape feature.</p>	<p>The Agency strongly agrees with this.</p> <p>The Agency aims to do this by seeking to influence local planning authorities to include flood plain and river corridor policies in development plans.</p>
	<p>Issue 15</p>	<p>The CA would wish to see a collaboration between the Agency and landowners to provide a range of landscape features, restore wetland habitat and create buffer zones (where appropriate) to protect and enhance biodiversity.</p>	<p>We are attempting to do this via all our activities including our consenting work, our comments on planning applications, our flood defence works and conservation projects.</p>
	<p>New Issue</p>	<p>The CA wishes to stress the importance of green corridors for recreation and access, which provide links between towns and the countryside. Rivers and canals make ideal connections. Consideration of access and recreation opportunities would assist in delivering integrated river-basin management.</p>	<p>We do not consider this requirement to be a new issue. The Agency is seeking to achieve such links through the land use planning system by seeking inclusion of policies in development plans and requesting planning conditions and legal agreements in relation to individual planning applications.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Maria Dempsey Continued	New Issue	What plans does the Agency have to encourage solar and wind power in the country?	No specific policies or statements on solar and wind power other than to give general support to such initiatives if appropriate.
	Issue 17	In respect of green waste clearance and recycling, are there any plans to include incentives in the Cheadle area, which does not involve a cost to residents?	The Agency supports reuse and recycling, however it is the responsibility of the local authority to arrange collection. The Recycling Officer at Staffordshire Moorlands Council is a suggested contact.
P Brassley Conservation Manager Derbyshire Wildlife Trust	General	I support the integration of Local Biodiversity Action Plans (LBAPs) and LEAPs, and the incorporation of general references to LBAPs, national key habitat/species etc, with particular reference to the mid-Derbyshire LBAP, its targets and objectives.	We would like to do this.
	Issue 2	The Trust remains concerned that opportunities for habitat creation are not lost, in the design of flood protection works. For example, otter holts, sand martin banks, artificial water vole burrows. We also suggest that flood balancing lagoons might provide suitable germination sites for native black poplar as part of attaining LBAP targets.	All flood protection works are subject to an EIA and all opportunities for habitat creation are examined. Where appropriate we would be happy to become involved with this.
	Issue 7.1	We agree with the option 7.1.2 presuming it means improving the stepping stones.	All options are being examined.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
P Brassley Conservation Manager Derbyshire Wildlife Trust Continued	Issue 15	This trust has data on all known black poplars in the Dove catchment and elsewhere in the county. The Trust is concerned about the fragmentation of water vole populations and the role of mink.	Possibilities for information transfer are welcomed. Your comments are noted.
T Dyke	New Issue	I would like to see increased water levels in the Fleam at Tutbury Mill site. I would like to see the whole area worked on to increase amenity facilities for the populations of Tutbury and Hatton.	Your comments are noted. Any amenity enhancement measures would need to have due regard to the existing flood defences in the locality at Tutbury which could be compromised by higher water levels.
P G Somerfield Principle Policy Officer East Staffordshire Borough Council	General Issue 7.2	In general my Council supports the philosophy behind the document, particularly sections 3 and 4, and welcomes the spirit of partnerships that underlie most of his work. I cannot accept the thrust of this issue. I cannot think of too many examples of severe degradation of landscape character in the Dove floodplain between "Uttoxeter and Burton, particularly north of Scropton and at Rolleston". There may be examples of inappropriate development in the Dove Valley, (whole settlements if one goes back in time far enough) but by definition any development in this area would degrade the landscape character and therefore could be classed as inappropriate.	Your support is welcomed. The degradation referred to in this issue relates to the large warehouse/distribution centres located close to the A50 eg Hayes Transport. However, we accept Mr Somerfield's point that most types of development in this flat flood plain location could be considered to be in appropriate. Moreover we accept his assertion that both Staffordshire County Council and East Staffordshire Borough Council have identified the A50 corridor as a catalyst for the promotion of employment development. Therefore we agree with his recommendation that the Agency needs to work in

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
P G Somerfield Principle Policy Officer East Staffordshire Borough Council Continued	Issue 7.2 Continued	<p>Unfortunately, the A50/A38 corridors have been identified both by Staffordshire County Council and my Council as growth areas. The Deposit Draft County Structure Plan, para. 4.53 clearly identifies the improved A50(T) as a catalyst for the promotion and development of employment land provision in the area. Indeed my own Council in its adopted Local Plan states that its major industrial requirements will be concentrated on the principle transport corridors.</p> <p>I think it is unrealistic therefore to prevent what you seem to describe as "inappropriate development". I would rather we accepted large scale development <u>may</u> occur along this corridor and we all work together through design advice such as planning briefs etc. to encourage a better quality of development in sustainable locations.</p>	partnership with Local Planning Authorities and developers to minimise the impact that large scale developments will have on this flat landscape. This recommendation is supported by Options for Action numbers 7.2.1 to 7.2.4.
Dr Roger Catchpole Conservation Officer English Nature (EN)	General	English Nature broadly welcomes the Dove LEAP and feels it will contribute to nature conservation in the catchment. I hope our comments will be useful and allow the Agency to further its contribution to nature conservation and sustainable resource use within the Dove catchment area.	Your comments are appreciated.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Dr Roger Catchpole Conservation Officer English Nature Continued	General Continued	English Nature are disappointed that Character Areas were used instead of Natural Areas which would have offered more insight into the ecological issues within the catchment as well as the more general landscape character. Although the Natural Areas within the catchment have been mentioned, no explicit use of their objectives or issues appears to present in the LEAP. For instance, the Needwood & South Derbyshire Claylands (40), White Peak (30) and South West Peak (29) Natural Area profiles all have specific sections on Rivers which have identified issues affecting the resource and conservation objectives for those resources.	Natural area profiles, although not directly mentioned in the text, were used to inform the issues section.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Dr Roger Catchpole Conservation Officer English Nature Continued</p>	<p>Issue 16</p>	<p>Although some aspects of agricultural activity have been examined in relation to changes in land use and sheep dips, there is a general lack of emphasis regarding the impact of such activity on the catchment. For instance pollution from both silage and animal slurry is recognised nationally as a major factor reducing surface water quality. It also has the potential to cause serious pollution incidents where point discharges enter rivers. As dairy and livestock rearing are significant land uses within this catchment, we would welcome a closer examination of how the Agency will ensure that any existing problems are identified and controlled. This will be important in order to ensure the maintenance and further improvement of water quality within the catchment. This work should also be extended to consider the effects of agricultural pollution on important geological features of the karst limestone. This issue has been the subject of research by the Limestone Research Group of Huddersfield University but this appears not to have been incorporated into the management of the wider catchment.</p>	<p>Historically resource constraints have prevented general preventative inspection of farms. an exception has been on particularly vulnerable strata such as Karstic limestone where targeted visits have sought to stop discharges of farm effluents into large ground faults (shacks). Such discharges caused dispersed pollution of watercourses and may have diminished amenity for existing and future caving activity. The Agency has a detailed policy document covering discharges to limestone strata.</p>

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 2	<p>English Nature recognises the need to protect property but would encourage a more holistic approach to flood defence that recognises the importance of seasonal inundation in maintaining certain habitats. The flood alleviation proposals do not appear to have considered the importance of this process on habitats such as wet woodland, wet lowland meadows and rush pasture. Both wet woodland and lowland meadow are considered priorities for conservation under the UK Biodiversity Action Plan and rush pasture is important for a number of breeding birds such as reed bunting and snipe. One of the main causes for the decline of such habitats has been a reduction in the duration and frequency of seasonal inundation that has resulted from flood alleviation schemes (UK Biodiversity Action Group, Tranche 2 Action Plans, Volume II). We would urge that any existing or proposed flood alleviation work is preceded by an EIA to identify any significant wet woodland and inundation meadow that may be present and to assess the likely impact. We would also recommend that the impact of any scheme on the potential for the creation of such habitats is fully assessed, as is the effect of any bank re-profiling or channel modifications on water vole and native crayfish populations. Additional action points should include the production of an audit of seasonally inundated habitats, the production of EIA's for the creation or uprating of flood defence measures and the identification of any important areas that require seasonal inundation for waders.</p>	<p>Your concerns are noted. Any proposed work would involve either raising existing flood embankments or extension of them in certain locations. Such proposals would not affect frequency of seasonal inundation in the reaches in question but we can assure any planned works will involve EIA (Environmental Impact Assessment). With regard to your concern that field drainage works in the upland catchment will result in increased flooding in the lower catchments. The accepted hydrological view is that field drainage improvements in the uplands of a catchment will not affect peak flood flows downstream. Flood flows will be generated predominantly by overland flows throughout the catchment.</p> <p>All Agency works including flood defence are subject to the feasibility stage of an EIA, which include consideration of all effects. With flood defence schemes this will clearly include the effect on inundation of other habitats. All the schemes under consideration are to defend villages only, so the effect on the wider flood plain will be to very slightly raise the water levels.</p> <p>Past land drainage works in upland areas have certainly had severe effects upon the ecology of these areas and may be having an effect on the amplitude of the flooding further down the catchment. However such works are totally outside the control of the Agency. We do have 30 years of rainfall and river</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 7.4	<p>Although an "Enhancing Biodiversity" logo appears in this section, general tree and shrub planting do not meet any clear UK Habitat Action Plan (HAP) targets. Action 7.4.1 should specify particular species and additional actions should be included for specific priority habitats where feasible. Any habitat creation should take account of existing habitats and aim to create a balanced mosaic of transitional communities along the rivers. This should encompass marginal, aquatic and riparian communities.</p>	<p>While we accept that tree and shrub planting for example do not form a UK Biodiversity Action Plan (BAP) target, it is essential to restore the extensive damage done by fast river works and as such this forms an essential element in the Rivers and Stream HAP. It has always been the intention to create a mosaic of habitats but the resources available, physical difficulties and the need to have enthusiastic landowners willing to give up a strip of land all mean that the scale of planting will be relatively small. As a result a mosaic of habitats will inevitably be created.</p>
	Issue 8	<p>All introduced salmon stock must be obtained from hatcheries that are certified to be free of non-native crayfish to minimise the risk of plague transmission. This should be routinely checked as part of the section 30 consent. Whilst we welcome the re-introduction of salmon to the River Dove, we believe this should only be undertaken following a full assessment of the impact on the existing wildlife communities within the river itself. Drawing broad inferences from other studies on a single species is not sufficient and we would urge an additional action point to consider these wider impacts.</p>	<p>The salmon that were introduced to the Dove were obtained from the Agency's Kielder hatchery on the River Tyne, Northumberland. The responsibility for disease issues in MAFF registered fish farms (which Kielder is) rests with the Ministry. However, the local EA conservation department has no records of non-Native crayfish in the Tyne catchment.</p> <p>We welcome English Nature's support for the re-introduction of salmon to the Dove. Regarding the impact on existing wildlife communities, we would emphasise that this is an attempt to re-introduce a species that was present in the catchment within the last 150 years, and was lost entirely because of human activities.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 11	<p>Pollution incidents on the River Dove involving synthetic pyrethroid sheep dips continue to threaten a white clawed crayfish population that is of international importance. The Dove is only one of three sites in the UK that has been included as part of a candidate Special Area of Conservation (Peak District and Dales cSAC) for its native crayfish population. Although other macro-invertebrates have recovered quickly from previous pollution incidents, the effect on the viability of the white clawed crayfish population remains unknown. The species has managed to survive so far but it should be emphasised that a more serious incident could have substantially greater effects and potentially lead to complete extinction within the catchment. Both chemical and biological monitoring (action 11:1) are important in assessing the degree of threat but these methods only provide evidence of a "smoking gun". We would encourage the use of a more pro-active approach as follows: a programme of targeted farm visits to all sheep farms with the potential to pollute the river and the prioritised enforcement of the new groundwater regulations around the River Dove and its tributaries. If the resources are not present to complete this within the next two years then we would strongly recommend that more funding is made available to the Upper Trent Region for this purpose. Farm visits should examine dipping facilities as well as disposal sites. Where on-site disposal is not possible, provision should be made for communal/mobile disposal.</p>	<p>In acknowledging the particular importance of the River Dove in conserving our native crayfish and the dangers posed particularly by synthetic pyrethroid sheep dip pollution, the Agency has worked with English Nature in putting together a comprehensive programme of additional preventative visits by Agency staff to sheep farms in the Upper Dove catchment during the Autumn of 1999. It is hoped that this together with new controls on the use and disposal of dip will bring about a large reduction dip pollution incidents. Recent programmes of biological sampling showed almost complete recovery of the biotic fauna in the affected area. This progress has been confirmed by chemical analysis of water samples taken as part of the routine monitoring programme.</p> <p>The Environment Agency will not grant permissions to abstract water where it is proved that the proposed abstraction is likely to have a significant affect on any Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) or Candidate Special Area of Conservation (SAC) site.</p> <p>As a way of ensuring that current abstractions are not damaging, the Environment Agency has begun to implement the Habitats Directive. Any licences found to be damaging shall be altered or revoked.</p> <p>Any applicant wishing to abstract water from a location where a risk of damage is perceived shall have to prove that the abstraction is non-damaging.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 12.3	<p>There are a number of Peak District SSSIs which could be affected by abstraction within the Dove catchment:</p> <p><i>Leek Moors</i> – Botanically-rich flushes, springs and seepage lines occur across the open moorland and moorland fringe habitats. In addition this site contributes to the international importance of the Peak District Moors SPA and wider area and this may, in part, be due to increased land drainage. Any abstraction which results in a general lowering of the water table could have a significant effect. We note that the site falls within the Hollingsclough Groundwater Management Unit and that the available groundwater resources have not been estimated for this unit. In consequence it is unclear how the sustainability of any existing or future abstraction can be determined. We also note that Severn Trent Water hold a substantial abstraction permission within 1km of the site boundary at SK 050 715. We would urge a review of this consent and further consideration of the impact on the aquifer. Anecdotal evidence from local walkers relating to surface wetness would seem to be insufficient.</p>	<p>Hollingsclough Groundwater Unit</p> <p>This is a minor aquifer unit which is highly heterogeneous (exhibits a variable ability to store and transmit water). With such variance, a holistic estimation of available groundwater resources within this unit would not be in the best interests of sustainable management. Due to difficulty in accurate resource assessment, each licence application is assessed on its own merits by the Environment Agency's Groundwater Section.</p> <p>Review of Licences</p> <p>Leek Moors is a part of the Peak District Moors SPA and will be subjected to a full review under the Habitats Directive. Any licences, which are deemed likely to have a significant affect, will be brought forward for full investigation and, where needed, alterations to damaging licences will be made. The Severn Trent Water Abstraction (SK 050 715) is from the Buxton Groundwater Management Unit. Due to differing geology this unit has limited hydraulic continuity with the Hollingsclough unit. However, due to its size and location this licence will be included in the Habitats Directive Assessment.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 12.3 Continued	<p><i>Dove Valley & Biggin Dale</i> → The upper reaches of the River Dove run through Dove Dale. The river is an integral part of the limestone dale ecosystem. The water quality of the river is acknowledged to be high, but is potentially under threat from discharges into the upper catchment. Water flows appear to be adequate but increased abstraction could reduce flows and reduce the dilution of discharges, thus affecting the water quality. We note that a hydrological assessment has not been done for this SSSI and in consequence its vulnerability to abstraction cannot be determined at the present time. We would request that a report is prepared to the same standard and format as the existing assessments for other SSSI's in the Peak District National Park.</p>	<p>This area is a candidate SAC and will be reviewed under the Habitats Directive. A hydrogeological assessment will be carried out as part of this review. Any licences found to be having significant effects will be investigated and where necessary, altered.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 12.3 Continued	<p><i>Hamps & Manifold Valleys</i> – This site shows partial underground capture of surface rivers in a karst region. Contrasting extents of this capture are demonstrated by the Hamps which nearly always sinks underground, and the Manifold, which sinks at various locations depending on the stage and in flood maintains a surface course right across the limestone outcrop. The natural hydrology of the rivers and associated caves could be affected by increased abstraction rates. We support the Alstonefield Groundwater Management policy statement which seeks to protect the current baseflow within the associated rivers, but we retain concerns regarding sewage pollution within the associated cave systems as well as the effect of agricultural pollution as previously mentioned.</p>	This is a candidate SAC and will be reviewed under the Habitats Directive.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 12.3 Continued.	<p><i>Moss Carr</i> -- This is a small flood plain mire close to the watershed between the upper dove and the Manifold which may be drying out as a result of drainage of the surrounding land. We suspect that any additional lowering of the water table, for example by abstraction, could add to existing problems. This is supported by the results of a hydrological assessment that suggested hydraulic continuity between the local mudstone aquifer and a neighbouring, high capacity, sandstone aquifer. While the underlying aquifer will not support major abstraction this is not the case for the neighbouring aquifer, both of which are in the Hollingsclough Groundwater Management Unit. We would urge further research on the degree of continuity between these aquifers and ask that all major abstraction applications are carefully considered and supported by an Environmental Assessment where appropriate in order to safeguard this site.</p>	<p>Moss Carr lies 1km outside the Peak District Moors Candidate SPA boundary and is likely to benefit from Habitats Directive related work in this area. It is accepted that the Hollingsclough Groundwater Unit is highly heterogeneous (variable in composition) and is likely to contain higher yielding sandstone bands within a lower yielding mudstone. Due to such complexity and "potential risk" of additional water table lowering, each new major (>20Ml/a) abstraction application shall receive thorough investigation including Environmental Assessment.</p> <p>Under current legislation Domestic Groundwater Abstractions less than 20m³/d are licence exempt. The largest of the 11 groundwater abstraction licences within 5km of Moss Carr is 4.5m³/day which if fully utilised would have negligible impacts on the site. Further research on the degree of continuity between the referred aquifers shall be undertaken on receipt of any new major (>20Ml/a) licence applications.</p> <p>Future surface water abstraction applications will be tied to Local Prescribed Flows.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 15 Continued	<p>notifying all riparian owners that it is an offence to release non-native species, production of a targeted publicity campaign, facilitation of new byelaw enforcement banning the use of crayfish as bait, collaboration in the production of interpretation signs at key points, determination of whether signal populations in the catchment carry plague, restriction of access to fords that cross rivers known to contain infected populations, encouragement of bleach disinfection facilities for anglers at key points, establishment of a register of approved fish re-stocking suppliers that do not rear non-native crayfish or have any previous history of rearing these species and enforcement through the use of section 30 consents. A further action point could also be included that will formally establish the full support of EA for the partnership that was recently established (Staffordshire Crayfish Action Group) to carry forward specific action to conserve native crayfish populations within the catchment.</p> <ul style="list-style-type: none"> Action 15.3 should be more explicitly linked with Issue 2. 	<p>Wetland conservation is of course considered in relation to all the Agency's activities including flood defence works. The flood defence works planned for the River Dove are most unlikely to effect any wetlands as they are designed specifically to protect settlements. In any case an EIA will be carried out to ensure that there are no adverse ecological effects.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
English Nature Continued	Issue 15 Continued	<ul style="list-style-type: none"> Action 15.4 should include the maintenance of the natural dynamics of river channels as appropriate management where possible. Daubenton's bat should be included as one of the key species because of its close association with the river environment. Foraging occurs over water and the removal of bankside vegetation can result in the destruction summer roosts. EA should ensure that they are aware of the requirements of this species when undertaking or authorising bankside management operations and seek to protect important foraging areas. These should be identified through specific survey action. 	<p>Your comments are welcomed and agreed:</p> <p>Maintenance of the natural dynamics of river channels is implicit within appropriate "management" and will of course be encouraged wherever possible.</p> <p>Data on the occurrence of Daubenton's bat on the Dove and tributaries was not considered sufficient for us to include actions for it within the LEAP. The tree planting programme which we are seeking to undertake will of course enhance the river for this species.</p>
	Issue 18	<p>The sewage treatment works at Waterhouses discharges to the River Hamps. For much of the year the river is dry so the discharge sinks to ground. In other parts of the White Peak, sewage entering cave systems has led to contamination of sediments within caves, reducing their scientific value, and has caused problems for recreational cavers and cave scientists. We would urge a review of existing consents for sewage treatment plants which discharge to ground within the Dove catchment.</p>	<p>All consented discharges from sewage treatment works and combined sewage overflows, including those entering groundwater, have been reviewed by the Agency to identify and prioritise necessary improvements to treatment for the period covered by Asset Management Plan 3 (AMP3) which covers years 2000-2005. When doing so we are mindful of the needs of all downstream users including cavers.</p> <p>At Waterhouses Sewage Treatment Works we have identified a need for improvements to both the storm and fully treated effluent discharges.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Chris Seabridge Farm Conservation Advisor Farming & Wildlife Advisory Group (FWAG) Stafford</p>	General	<p>Thank you for giving Staffordshire FWAG the opportunity of responding to the draft LEAP for the Dove Catchment. The draft document is comprehensive and addresses a multitude of issues that affect the environmental quality of the Dove catchment. We are pleased to be acknowledged as a partner organisation in the implementation of the Dove LEAP. FWAG has an effective delivery system for farm conservation advice and has the trust and respect of farmers. FWAG supports schemes, which assist farmers to create and enhance wildlife habitats.</p>	<p>Your comments are welcomed.</p>
	Issue 16	<p>The Dove LEAP has highlighted the need for evermore specialist and targeted advice, particularly in relation to the protection of the water environment. To tackle specific catchment issues closer EA/FWAG links should be developed to ensure effective utilisation of limited resources. A targeted partnership approach could tackle and deliver a multitude of objectives. I look forward to assisting the EA in the implementation of the Dove LEAP.</p>	<p>Your comments and support through partnership are welcomed.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Chris Seabridge Farm Conservation Advisor Farming & Wildlife Advisory Group (FWAG) Stafford	Issue 1	During farm visits FWAG is in a position to advise farmers/landowners on the safe use of herbicides and encourage the inclusion of buffer strips adjacent to watercourses in order to protect them from agricultural practices. Targeted farm visits are a successful medium in getting the message of safe farming practices and pollution prevention across to farmers.	We welcome this proposal. The Agency will explore possible funding for this as part of the Action Plan.
	Issue 7	<p>7.3 Changes in agricultural land use</p> <p>Along with the EA, FWAG is also concerned about the inappropriate maintenance of field boundaries and its effect on the landscape and wildlife. During farm visits FWAG actively promotes sensitive management and restoration of field boundaries. When commissioned whole farm boundary surveys are incorporated in Landwise Plans. This prioritises management requirements and highlights available grant funding. FWAG specialises in providing guidance on the reparation and integration of the MAFF grants that include boundary restoration schemes.</p> <p>FWAG and the EA need to meet to discuss how a targeted approach could be undertaken on the most degraded areas of the Dove catchment.</p>	We try to influence others to manage and protect field boundaries. We do not have any regulatory powers in this area.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Chris Seabridge Farm Conservation Advisor Farming & Wildlife Advisory Group (FWAG) Stafford Continued	Issue 7 Continued	<p>7.4. Loss of habitat diversity in the lower reaches of the Dove catchment</p> <p>Staffordshire FWAG is concerned that it is not identified as a partner organisation in this aspect of the Plan. We are concerned at the loss of habitat diversity and the resulting decrease in biodiversity. FWAG actively promotes environmentally responsible farming practises and encourage sensitive riparian habitat management, which includes buffer strip creation and the extensive management of flood meadows.</p> <p>FWAG could play an important role in the implementation of this aspect of the Plan.</p>	<p>This concern is acknowledged. FWAG will be identified as a partner organisation.</p>
	Issue 11	<p>FWAG promotes the responsible usage and disposal of sheepdip when visiting sheep farms. Informal Farmer/Adviser discussions offer the ideal medium to promote best practise and protect riparian habitat from sheepdip contamination. The independent confidential service provided by FWAG produces an informal atmosphere where the farmer's sheep dipping procedure can be discussed to ensure compliance with best practice.</p>	<p>The Agency currently have a targeted programme of sheep farm inspections on the Upper Dove catchment using Agency staff. FWAG involvement to promote good sheep dipping practice generally would be welcome.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Chris Seabridge Farm Conservation Advisor Farming & Wildlife Advisory Group (FWAG) Stafford Continued</p>	<p>Issue 15</p>	<p>FWAG is committed to helping meet the objectives that are set out in the various species and habitats within Biodiversity Action Plans. Staffordshire FWAG is a member of the Staffordshire Biodiversity Action Plan steering group and is playing a key role in the Plan's implementation. FWAG is ideally placed to advise farmers on the management and creation of habitats required to support many of the target species, which are affected by agricultural landuse.</p> <p>FWAG plays an important role in identifying and encouraging the sensitive management of wildlife habitat and is surprised not to be included in this section of the Plan.</p>	<p>Your comments are noted.</p>
	<p>Issue 16</p>	<p>Farmers deal with a huge range of materials many that can cause pollution if mishandled or utilised incorrectly. Careless disposal of these materials can quickly lead to a pollution incident with residues finding their way into watercourses, streams, rivers and groundwater.</p> <p>During farm conservation visits, where possible, FWAG endeavours to raise awareness of the potential of agricultural pollution, highlighting vulnerable areas on individual farms. Staffordshire FWAG's Adviser is trained in the production of Farm Waste Management Plans. Promoting environmentally responsible farming is viewed as an important aspect of farm conservation advice.</p>	<p>FWAG involvement in the promotion of general good practice would be welcomed.</p> <p>FWAG involvement in the promotion of general good practice would be welcomed.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Chris Seabridge Farm Conservation Advisor Farming & Wildlife Advisory Group (FWAG) Stafford Continued	Issue 17	The responsible disposal of farm waste is an issue that confronts all farmers. In-appropriate disposal can cause air, soil and water pollution and be detrimental to the aesthetic value of the countryside. FWAG seeks to educate farmers/landowners in the reduction and safe disposal of farm waste and does promote the MAFF Codes of Practice for the Protection of Water, Air and Soil. However the successful recycling and recovery of agricultural wastes, particularly old silage clamp sheets and bale wrapping is an area that needs to be confronted.	Comments welcomed. The Agency welcomes any opportunity to work in partnership with other organisations. Some issues are not only local problems, but need to be addressed regionally or nationally.
Sara Barrett Farm Conservation Officer Farming and Wildlife Advisory Group (FWAG) Derbyshire	General	Thank you for giving Derbyshire FWAG the opportunity of responding to the Dove LEAP. We recognise the importance of taking a holistic approach to the issues affecting the environmental quality of the Dove catchment. In order to gain the benefits of this approach we would like to see a detailed implementation plan, drawn up in agreement with partner organisations, identifying areas of responsibility and specific targets. Without such agreements, a peace meal approach will tend to develop. We would like to see a co-ordinated, planned approach which can then form the stimulus for more actions.	We have held meetings to try and develop such an approach and would welcome attendance by Derbyshire FWAG at these meetings.

3 Comments Received and Agency's Response

Organisation/ individual	Section	Comments	Response
<p>Sara Barrett Farm Conservation Officer Farming and Wildlife Advisory Group (FWAG) Derbyshire Continued</p>	<p>Issue 7</p>	<p>7.3 Changes in agricultural land use</p> <p>As recognised in the Plan, FWAG is a key organisation involved in mitigating the negative impacts of changes in agricultural land use</p> <p>It is one of the key areas of FWAG's work to prepare Landwise Whole Farm Plans (please refer to enclosed leaflet) which identify features that should be maintained, enhanced or created and the means by which this may be achieved eg changes to management, grant schemes such as the Countryside Stewardship Scheme. it is my experience that many farmers are currently making key decisions that may have significant impacts on the countryside as the industry is becoming more and more polarised into small and very big farms.</p> <p>Derbyshire FWAG has a very good base of contacts in the catchment area outside the National Park from which it could easily expand.</p>	<p>We have held meetings to liaise with FWAG over such issues and would welcome input from Derbyshire FWAG. As a result of meetings with Staffordshire FWAG we have set up a formal partnership.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Sara Barrett Farm Conservation Officer Farming and Wildlife Advisory Group (FWAG) Derbyshire Continued</p>	<p>Issue 13</p>	<p>As identified in 13.1 FWAG has a key role to play in promoting sustainable river bank management. FWAG consistently looks at river bank management and how this may be improved through changes to grazing, fencing to protect riparian vegetation, tree planting and the creation of buffer strips (preferably 6m wide). Often this work forms part of a Countryside Stewardship application which ensures that work is undertaken and provides financial assistance to do it.</p> <p>There is scope for targeting key areas along the River Dove and encouraging adjacent landowners/managers to prepare a combined Countryside Stewardship application that addresses the particular issues on each farm. The benefits of a combined application are: a) to dramatically increase the chances of being successful in the Stewardship scheme which is becoming more and more competitive, and b) to produce combined improvements that together will have a more significant impact that if they were distributed throughout the catchment.</p> <p>To achieve this, a specifically targeted area needs to be identified and landowners/managers approached. If tangible improvements are achieved this provides a good stimulus for further work in other parts of the catchment. FWAG could take such an approach and follow up the "Living on the Edge" initiative already started by the EA.</p>	<p>The Agency is pleased with FWAG's supportive and constructive response on the issue. The Agency will work with FWAG to identify reaches of the Dove suitable for specific targeting for combined countryside stewardship applications.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Sara Barrett Farm Conservation Officer Farming and Wildlife Advisory Group (FWAG) Derbyshire Continued</p>	<p>Issue 15</p>	<p>I was surprised not to see FWAG mentioned as a deliverer of biodiversity actions/targets in the Plan. Our work very much includes addressing both national and local biodiversity objectives at the farm level. FWAG has developed a BAP report specific to individual farms which raises awareness about BAP habitats and species and identifies actions that may be taken to enhance them.</p> <p>In addition to the National BAP species and habitats included in the Plan, I would welcome more recognition of the importance of Local BAPs eg Mid Derbyshire BAP. While national targets are limited when applied to the Dove catchment, by addressing the local issues the importance of biodiversity can be spread to a much wider audience – making it relevant to all.</p> <p><u>How FWAG delivers biodiversity</u></p> <p>Elsewhere in the county Derbyshire FWAG is working closely with Graeme Smart, Otters and Rivers Project Officer, to identify key areas where it is appropriate to try and improve riverine habitats and this work could be extended to the Dove, working with Nick Mott.</p> <p>FWAG has also been involved in the Water Vole Project in the county and has implemented improvements to bankside vegetation and management in the light of survey information.</p>	<p>Your comments are noted.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Sara Barrett Farm Conservation Officer Farming and Wildlife Advisory Group (FWAG) Derbyshire Continued</p>	<p>Issue 15 Continued</p>	<p>The two species mentioned above provide a good example of how a co-ordinated and structured approach is important to guard against conflicting recommendations being suggested. Management recommendations for the otter and the water vole are quite different and it is important to identify priorities to avoid potentially damaging actions.</p> <p>The other national BAP species that FWAG considers on farm visits is the Great Crested Newt. Pond creation and management/restoration takes account of this species in the context of the county records for Great Crested Newt.</p> <p>Of the national BAP habitats relevant to the LEAP grazing marshes are covered in farm visits. Improvements to management are often linked to a Countryside Stewardship application as a means of funding eg reduced stocking rates.</p> <p>In addition to the National BAP habitats and targets, Derbyshire FWAG is a key implementor in the Mid Derbyshire Local BAP. Whole Farm Plans address local targets and raise awareness of biodiversity in general.</p>	<p>We are aware of the potential conflicts and welcome your comments.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Sara Barrett Farm Conservation Officer Farming and Wildlife Advisory Group (FWAG) Derbyshire Continued	Issue 17	<p>As recognised in 17.4 FWAG has a role to play in farm waste management. As part of the Landwise system FWAG has developed a Waste Management module which specifically looks at the manurial value of waste, wise use of waste, protecting sensitive habitats and buffering watercourses and raising awareness of the MAFF code of Good Agricultural Practice for the protection of Water.</p> <p>As with the use of sheepdip FWAG is in a good position to raise awareness of potential pollution problems due to its independent status.</p>	FWAG has been contacted regarding a Campaign to address problems of Sheep Dip in the catchment. contact Ian Hassell, Campaigns Officer, Tactical Planning.
Matthew Woodcock Assistant Conservator Forestry Commission (Midlands)	Issue 15	The government have recently published its England Forestry Strategy which outlines how we can all use trees and woodlands to deliver a multitude of public benefits (copy of document received). This broadly sets the scene for our comments.	

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Matthew Woodcock Assistant Conservator Forestry Commission (Midlands) Continued</p>	<p>Issue 15 Continued</p>	<p>In woodland terms there are three national priority woodland Habitat Action Plans (HAPs) that impact upon the Dove LEAP area:</p> <ul style="list-style-type: none"> a) Upland Oak; b) Upland Ash; and c) Wet Woodland <p>These HAPs have now been published and national targets for restoration and expansion are being developed.</p> <p>In many cases the "remains" of upland ash and oak woods can be found along upland watercourses.</p> <p>Wet woodlands have been even more badly affected but there are major opportunities to create new wet woodland habitats especially in the lower Dove area. Mineral extraction offers the opportunity for restoration to flood plain forestry, resulting in enhanced landscape, create screening for new development and contribute to national and local biodiversity targets. There are benefits of all agencies' working together to encourage the restoration of habitats.</p>	<p>We strongly support this and welcome the opportunity to develop partnerships.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Matthew Woodcock Assistant Conservator Forestry Commission (Midlands) Continued	Issue 7.4	<p>The plan refers to "Large blocks of newly introduced forestry planting can also be seen in this part of the area" (page 44). I assume this refers to planting carried out in the last 50 years or so. I must point out that we would expect all current forestry operations to be carried out to at least meet the EC's Guidelines. As the "large blocks" progress towards maturity we will be encouraging owners to restructure them so that they compliment local landscapes and habitats.</p>	<p>Within the Dove area the Agency has no land ownership. This issue is most appropriate for local authorities to act upon.</p> <p>Your comments are noted.</p> <p>We would have no objection to improvement of landscape and best practice in tree planting and maintenance, nor to the use of wood as fuel.</p>
	New Issue	<p>There will be increasing pressure for all government departments to open publicly owned land for access and advertise it accordingly. If we can encourage a common approach to mapping of access we can then target resources to fill the gaps. Collectively we can take a more strategic view of the best places to site car parks, or create links to bus and rail networks.</p>	
	Issue 10	<p>I commend the idea of developing environmental committees on rural trading estates. We would like to see the inclusion of the following:</p> <ul style="list-style-type: none"> a) Improving the internal and external landscapes of such sites by appropriate tree and shrub planting. b) The use of best practice in tree planting and maintenance. 	

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
	Issue 7.1	I am concerned that there should be careful channelling of tourist developments to avoid too much pressure in the river valleys.	<p>The Agency agrees with this concern.</p> <p>Where tourist development is proposed in river valleys the Agency is anxious to become involved in pre-planning application discussions at an early stage. The Agency has a general duty to ensure that water and associated land areas are made available for recreational purposes and will respond accordingly to planning applications for such uses. However this duty needs to be balanced against our other responsibilities for flood defence, pollution prevention and biodiversity.</p>
Colin Sawyer The Hawk & Owl Trust	General	Thank you for giving the Hawk and Owl Trust (HOT) the opportunity to comment on the Dove consultation draft. The Trust has been working in partnership with the Agency in all regions on extensive schemes to conserve Barn Owls and Kestrels including the Red Data Book species and the Amber List and we are committed to continue and strengthen this valuable partnership.	The Agency is very supportive of birds of prey conservation, particularly along river valleys. We are in a good position to promote such a project with farmers and riparian land owners. We are aware of other partnerships ongoing between the Agency and the HOT and are keen to see one set up in the Upper Trent Area where resources allow.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Colin Sawyer The Hawk & Owl Trust Continued	Issue 15	<p>Owls and other birds of prey are key indicator species of the health and wealth of the environment. The Trust is advising and undertaking a practical programme of work involving the management of grassland on the banks of many rivers and their associated tributaries. This compliments schemes, which encourage the establishment of field margins under Countryside Stewardship and in particular to provide greater feeding opportunities for Barn Owls and numerous other species dependent on grassland habitat. In order to ensure that sufficient nesting and roosting sites are available for Barn owls, nestboxes are installed in river valleys, all of which has met with enthusiasm from farmers and landowners.</p> <p>The next scheme involving practical initiatives will be completed this autumn for the Agency on the River Trent. A similar project on some parts of the Dove would undoubtedly compliment the Trusts already established partnership schemes with the Agency. We would be grateful if this could be taken into consideration when drawing up the Action Plan.</p>	

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Neil Edwards Executive Director The Inland Waterways Association Continued	Issue 6	<p>No reference appears to be made to the Cauldon Canal with respect to flooding in Leek. The present canal stops short of its original terminus and basin in Leek town. Various plans to restore the canal to a new terminus in the town have been proposed in the past but have not progressed. However, a final stretch of canal into the town would be of immense value for both recreation and the town's economy.</p> <p>A similar situation existed in Chelmsford (Essex) until about 5 years ago, when the National Rivers Authority joined forces with other parties to fund the restoration of the Chelmsford and Blackwater navigation and Springfield Basin into Chelmsford – <u>partly to assist flood defence</u>. The advantage of the restoration now being an additional flood relief channel. Have the Agency investigated whether a similar scheme might work in Leek? Could a restored canal Basin provide additional flood relief capacity? Other parties that could be involved include British Waterways, Caldon Canal Society and IWA Stoke-on-Trent Branch.</p>	The flooding problem is centred on the River Churnet upstream of the Macclesfield Road and accordingly the topography of Leek is such that their restored canal basin would not provide relief. However your comments are welcomed and the recreational benefits of restoring the canal basin into the town are noted.
A Tatton Joshua Wardle Ltd	General	To list only five issues on this questionnaire is somewhat restrictive. However, the important issues do appear to have been identified.	Your comments are noted and welcomed.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
T S Locker Continued	New Issue Continued		<p>During our routine abstraction licence enforcement visits we are also promoting the work of the Environmental Technology Best Practice Programme (ETBPP). This Programme is a joint DTI/DETR funded initiative which aims to promote better environmental practices, including water conservation, that reduce business costs for UK industry. Applicants who wish to alter their existing abstraction licences or obtain a new one have to justify the need for the quantities of water they have applied for as part of the application process.</p> <p>The Agency is also continually highlighting the need to consider water use to all local councils by including water conservation comments in our responses to planning applications and local structure plans in the hope that water efficient appliances and devices will become standard features in all new developments.</p> <p>The water companies have a role to play too in encouraging a reduction in water consumption by their customers. We are currently investigating the scope for joint projects.</p> <p>The Agency will continue to lobby local planning authorities for inclusion of water conservation policies in development plans. We are also targeting industry on the merits of water usage efficiency.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Mrs W G Scott for Cllr Neil Andrew Marchington Parish Council	General	<p>Thank you for the opportunity to review the draft document. My Council would welcome the opportunity to discuss further initiatives in the vicinity of Marchington.</p> <p>I am concerned that Marchington Brook no longer appears on your map as one of the main tributaries to the River Dove. My Council strongly suggests that Marchington Brook is included within any environmental plans for the area as a significant watercourse.</p>	<p>We note your concern that the Marchington Brook does not appear on the catchment map in the Consultation Report. As you correctly point Marchington Brook is a significant arterial tributary of the River Dove. This is due to the Agency's changed format in producing the LEAP plan together with a supportive "Environmental Overview of the Dove LEAP" being a fully technical complementary document. This overview is available on request and the detailed catchment maps in it show the Marchington Brook.</p>
	New Issue	<p>The previous CMP item 12 recognised the flooding risk at Marchington. There is now an opportunity to ensure that the existing arrangements successfully drain excess water from behind Church Close (SK 137 306) beneath the road (Moreton Lane) to a point on the northwest of the proposed prison site (SK 144 308). From this point the developer will manage the flows to the new pumping station at Draycott with the minimum of restriction.</p>	<p>The improved outfall facility for the Draycott Mill watercourse provided by the associated surface water works for the Moreton lane prison is a matter the Agency is aware of, having been instrumental in ensuring its provision. Any benefits from this improved outfall also occurring to the surface water system in Marchington is an area the District Council would pursue in liaison the Parish Council.</p>

Organisation/ Individual	Section	Comments	Response
Philip Myott Continued	Issue 8 Continued	Despite the claims that there is no evidence to support the claims, cormorant populations are having a negative effect on fish stocks throughout the whole of the Dove and Trent Valleys. Has their effect on the salmon parr introduced been considered?	There remains no evidence that cormorant populations are having a negative effect on fish stocks in the Dove and Trent valleys. Their effect on the salmon parr introduced has not been considered.
	Issue 15	<p>The Otter:</p> <p>a) Are angling clubs and fishery owners being made aware that there is a risk of otters preying on the fish in their waters? (I have a copy of your leaflet about otter predation and read an article on the subject in the magazine "Carpworld" in September 1998).</p> <p>b) There is a possible conflict here between the return of otters to the area and the reintroduction of salmon into the river.</p>	<p>The Otter:</p> <p>a) In addition to the leaflet on otter predation, angling clubs and fishery owners are being made aware that there is a risk of otters preying on the fish in their waters via:</p> <ul style="list-style-type: none"> • Fisheries inspectors • Comments on all planning applications for new fisheries • Public meetings <p>b) There is not considered to be a conflict between the return of otters and the reintroduction of salmon into the river. Otters, being a natural part of the ecosystem represent no threat whatever to salmon stocks.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Philip Myott Continued	Issue 15 Continued	<p>The Water Vole:</p> <p>There would appear to be a need to investigate the reasons behind the decline of the water vole as well as assessing their distribution (is there any connection between their decline and the increase in the mink population?).</p>	<p>The Water Vole:</p> <p>Reasons for the decline of the water vole are being investigated by a research and development project based in Thames Region. The introduced American Mink is certainly one factor in the decline but habitat management and disturbance are also serious factors.</p>
Andrew Richards Senior Technical Advisor National Farmers Union (NFU) West Midlands Region	<p>General</p> <p>Issue 1</p> <p>Issue 2</p>	<p>The NFU welcome the opportunity to comment on this draft and our observations are listed below:</p> <p>The NFU welcome the role being taken by the Agency to raise awareness of this problem amongst the farming community. The NFU would be prepared to support initiatives which have this objective.</p> <p>The NFU notes proposals to instigate a flood protection scheme at Hatton. However, it is considered that the problem is not confined to the Hatton area. Information from the locality suggests that much of the run-off water from the new development is discharged straight into existing ditches which are inadequate to carry this volume of water.</p>	<p>Your support is welcomed by the Agency.</p> <p>Where new development proposals are referred to us for comment by Local Planning Authorities we consider the means by which surface water is to be discharged and advise Local Planning Authorities accordingly. Where existing ditches are considered to be inadequate we recommend environmentally sensitive improvements together with the introduction of sustainable drainage techniques where ground conditions are suitable.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Andrew Richards Senior Technical Advisor National Farmers Union West Midlands Region Continued	Issue 3	The proposals are noted and the NFU would support options 3.1 and 3.2.	Your support is welcomed by the Agency.
	Issue 4	The issues are noted and the options are supported particularly the option 4.2.	
	Issue 5	The NFU believes there is a need to carefully monitor the emissions from the kilns which are fuelled by tyres or other types of high calorific fuels. In particular, it is believed there is a need to carefully monitor any depositions on surrounding pasturelands down wind of the kilns. It is important to recognise that livestock grazing contaminated grassland can provide a point of entry for contaminants into the food chain.	<p>Blue Circle's Authorisation to operate their cement kiln at Cauldon requires them to monitor emissions from the kiln continuously. In addition they are also required to carry out extensive sampling and monitoring twice a year which is done for them by external contractors. The Environment Agency also arranges for (different) external contractors to carry out sampling and monitoring on its behalf once a year as a check on the data supplied by the company.</p> <p>Blue Circle will be submitted a report next year on the modelling of dispersion of releases to air. This will include predictions of deposition of releases to land.</p> <p>Please do not hesitate to contact Richard Lee, the Site Inspector for Cauldon Works, should you have any further questions about Blue Circle's operations there. He can be contacted on 01543 444141, extension 4836.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Andrew Richards Senior Technical Advisor National Farmers Union West Midlands Region Continued	Issue 6	It is generally considered that the flood warning systems are operating well. The issues are noted and supported.	Your support for the flood warning system is noted and welcomed.
	Issue 7	The problem of erosion is noted. The NFU believe that an option under Issue 7.1 should include works for the improvement of the path between Mill Dale and the stepping stones. The NFU notes the proposals for a survey of ecological damage at Issue 7.2.1. We consider it is important to involve the local population in such a survey as this is the only means of identifying the exact nature of the problem.	The ecological survey will need to be carried out before involving the public as it is necessary to inform their opinions.
	Issue 7.3	Whilst sympathetic to the content of this issue, the NFU note that other organisations carry the lead role in this field. The inclusion of this topic within the Agency's LEAP should therefore have a reduced significance.	
	Issue 7.4	Proposals for a fencing programme at Issue 7.4.1 are noted. The NFU believes that the Agency should note the problems of fencing along a riverbank which is prone to flooding. In the worst case, this could result in the fence having to be replaced on an annual basis.	This is taken into account in planning the work.
	Issue 11	The NFU note the options and support them.	
	Issue 12	The options are noted and supported.	

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>Andrew Richards Senior Technical Advisor National Farmers Union West Midlands Region Continued</p>	Issue 13	<p>The NFU notes proposals for fencing of riverbanks and would refer to earlier comments on Issue 7.4.1 above. It should also be noted that where fencing prevents stocks from gaining access to the river for drinking water, then unless there are alternative water supplies available, the land may not be useable for the grazing of livestock.</p> <p>It is noted that there are proposals for three sites to be selected for a river bank erosion project. In order to gain the full benefit from the results of this project, it is believed that the initiative should be publicised and neighbouring land occupiers be invited to visit and see the results.</p>	<p>All this work is only done with the full co-operation of the landowner who will no doubt take this into account.</p> <p>The EA welcome working in partnership with others to deliver clear messages. Once suitable material has been prepared we would welcome the opportunity to liaise with the NFU.</p>
	Issue 15	<p>The NFU would fully support the action at option 15.5 to control the spread of invasive weeds.</p>	
	Issue 17	<p>The NFU would welcome any advice available as proposed under option 17.4.</p>	

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Andrew Richards Senior Technical Advisor National Farmers Union West Midlands Region Continued	Section 4.4.2	The NFU would fully agree and support the comments within this Section. In particular, we would highlight the importance of considering the management of surface water as being a fundamental part of the design and operation of any new development project.	We agree that the management of surface water is a fundamental part of the design and operation of any new development project. The Agency is seeking to influence local planning authorities to include "source control techniques/sustainable urban drainage systems" policies in their development plans – such that developers are forced to consider these techniques first before the more traditional means of surface water drainage. Also when responding to planning applications we advise Local Planning Authorities and developers to investigate these techniques and recommend the imposition of planning conditions to ensure that surface water is managed in this way. Unfortunately the management of such systems can become an obstacle and the Agency will need to continue to press for greater use of legal agreements to ensure that sustainable urban drainage systems are properly managed.
P J Davey Area Management Service Manager Peak District National Park Authority	General	We welcome the opportunity to comment on what is generally a wide ranging, informative and well presented report. We are interested in the scope of the Staffordshire Moorlands survey, did this include the area in the National Park if so is this information available?	The Staffordshire Moorland Survey does not extend in to the National Park, however a variety of ecological survey data is available to all members of the public at Staffordshire Local Records Centre: Contact Keith Bloor 01782 232583. Potteries Museum & Art Gallery, Hanley, Stoke on Trent.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>P J Davey Area Management Service Manager Peak District National Park Authority Continued</p>	<p>General Continued</p>	<p>The scheme for the footpath scheme Milldale to Lode Mill has been completed, as have repairs and improvements to the riverside footpath between Thorpe and Hartington.</p>	<p>MAFF administer the South West Peak Environmentally Sensitive Area (ESA) scheme whereby participating landowners accept restrictions on herbicide usage and have accepted Agency herbicide awareness articles in their newsletter. NFU have been very positive in supporting Agency initiatives – see comments by Andrew Richards, Senior Technical Advisor NFU – West Midlands Region.</p> <p>Your comments are noted.</p> <p>The Agency welcomes the opportunity to develop partnerships and provide support where possible.</p>
	<p>Issue 1</p>	<p>Is there a role for MAFF and NFU under action 1.2?</p>	
	<p>Issue 7</p>	<p>We are interested in comments about land drainage and drying out of upland grazing areas. We are concerned over the loss of wetland habitats in the Staffordshire Moors.</p> <p>We are concerned about the pressure from visitors on many areas within the Dove catchment. We are committed to promoting sustainable tourism and are actively involved in visitor management. We would welcome the Agency's support in achieving a solution to the footbridge/stepping stones matter.</p>	

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
<p>P J Davey Area Management Service Manager Peak District National Park Authority Continued</p>	<p>Issue 15</p>	<p>The section on great crested newts ought to refer to lack of dewpond repair and maintenance. We are in the process of producing the Peak District Local Biodiversity Action Plan. We would welcome our inclusion in actions 15.1 and 15.2. We would wish to see the inclusion of publicity in action 15.2 and suggest angling clubs sign up to the non-release of non-native crayfish.</p> <p>Given that parts of the area are designed as a SAC because of the crayfish population, the international significance of the site (and statutory implications) warrants identification of native crayfish conservation as a separate issue in its own right.</p> <p>There is no reference to mink. Should BAP habitats and species be qualified by reference to wetland or aquatic species in the area? Wet woodland should also be included.</p>	<p>Your comments are noted and welcomed. The Agency welcomes any opportunity to develop partnerships.</p>
<p>Charles Wildgoose Footpath Secretary The Ramblers Assoc</p>	<p>Issue 7</p>	<p>Our group believes that the plan omits to state that if the footbridge over the Dove were to be moved, there would be a loss of a convenient and heavily used link between the path from Ilam and Thorpe Footpath No 14 as well as the concessionary path on the southern side of Thorpe Cloud.</p>	<p>Your comments are noted and have been forwarded to all organisations involved with this issue.</p>

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Charles Wildgoose Footpath Secretary The Ramblers Assoc Continued	Issue 7 Continued	The plan also fails to explain that the existing footbridge is a public right of way and that we believe that reasons for the closure of the right of way do not meet with the Highways Act 1980, Section 118.	
Stephen Peters River Users Co-Ordinator National Association of Boat Owners	New Issue	I am concerned that there should be a constant and adequate water supply to Caldon Canal from Rudyard Reservoir.	British Waterways are responsible for Rudyard Lake which is the feeder system for the Caldon Canal and it is their responsibility to manage an adequate supply. A minimum flow has to be maintained downstream of the reservoir which we would not want to see altered.
P H Sherratt	Issue 4 Issue 5	What is the name and address of the site from which contaminated water emanates (Leek area)? What "pollutants" are monitored at Blue Circle during tyre incineration? Could you provide a copy of the analytical results please?	The Agency is unable to issue this information at present as it continues to be in confidential correspondence with the party/parties concerned. A quarterly returns for dioxins and Volatile Organic Compounds has been forwarded.

3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
P H Sherratt Continued	Issue 12	Is the area affected by the cessation of mine working – water table rebound?	Both the Staffordshire and South Staffordshire areas have actual and potential groundwater and surface water pollution due to mine closures in the relevant coalfields. Caused because minewater has stopped being pumped out of the mines and the water has subsequently risen underground and appeared at the nearest low point, usually into a watercourse – this is what is meant by rebound. The only coalfield in the Dove catchment is the small one around Cheadle which has been opencasted in the past (shallow workings only, not involving pumping out of groundwater). There are therefore no problems with minewater.
	Issue 17	<p>I would have liked the plan to include the progress and plans to meet the UK government recycling target of 25% by 2000 and 40% recovery by 2005.</p> <p>I am concerned that the plan did not include a waste management plan for the area indicating that secure and sustainable disposal is in place.</p>	<p>The reporting of recycling targets is the responsibility of the LA. Any information should be requested from the recycling office at the LA.</p> <p>The LA's Waste Local Plans identifies the need for sites and waste management policies. The EA are also due to publish strategic Waste Management Assessments next year which will detail existing waste management sites and identify wastes deposited.</p>

3 Comments Received and Agency's Response

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Mrs Mary B L Booth Chief Executive Staffordshire Parish Council's Assoc	General	<p>It was quite difficult to prioritise issues when they range from site specific, to plan wide to national issues</p> <p>I am concerned that the potential role of Parish Councils as partners in taking action on many issues appears to have been overlooked. They could help with flood warning; education of farmers about sheep-dip, herbicide etc, local knowledge about sources of pollution; environmental issues that should be considered in planning applications etc. Parish and Town Councils are part of local administration. Reference could have been made to Village Design Statements, eg recently published Rolleston on Dove.</p> <p>Their obvious INTEREST in the LEAP should be tapped – 22% of those who responded to the pre-publication consultation were Staffordshire Parishes.</p>	<p>Your comments are appreciated and have been passed on to individual Agency functions and shall be considered on an individual action basis. The Agency welcomes any support offered to further peoples knowledge of environmental issues. For further information, a list of Agency publications will appear in the Dove Action Plan. The Agency always welcomes comments made by Parish Councils as they assist in the preparation of LEAP documents.</p> <p>Any environmental issue which needs to be addressed when a planning application is considered should first be brought to the attention of the appropriate local planning authority who will continue to pass the information on to the relevant organisation for comment. Village design statements are used by local planning authorities only.</p> <p>Whilst your offer for assistance in operating flood warnings is appreciated, the Agency has in place a formal network for its flood warning system.</p>

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Organisation/ Individual	Section	Comments	Response
Mrs Mary B L Booth Chief Executive Staffordshire Parish Council's Assoc Continued	Issue 1	Please clarify options for action. I am concerned that the Agency is not prioritising prevention over monitoring as in 1.1 and 1.2.	All actions identified in the tables are being proposed for implementation during the five year plan period. It is not an either/or choice between for example 1.1 and 1.2.
	Issue 7	I would like to see an action for the restoration of wetlands.	Where possible we work to retain/restore wetlands. Other bodies eg under Countryside Stewardship Schemes, will also seek restoration of wetlands.
	Issue 19	I am concerned that the responsibility for flooding is not as clear-cut as the table on page 4 suggests. Agencies keep "passing the buck" while local communities suffer "1 in 100 year floods" which are occurring more frequently.	The split in responsibilities with regard to rivers and watercourses unfortunately does lead to confusion in determining who is responsible for what. There is a useful booklet called "Land Drainage and Flood Defence Responsibilities" produced by the Institute of Civil Engineers (ISBN 0-7277-2508-4), published by Thomas Telford Services Limited, 1 Heron Quay, London E14 4JD. this sets out in "layman terms" the various responsibilities between the Agency, District Councils and Internal Drainage Boards who are the operating authorities in terms of maintenance and improvement on watercourses. It may be useful for your association to have access to a copy of this publication.

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3 Comments Received and Agency's Response

Organisation/ Individual	Section	Comments	Response
Mrs Mary B L Booth Chief Executive Staffordshire Parish Council's Assoc Continued			Whilst in the long term there is concern that there is the possibility of climate change there is no proven evidence of the more frequent occurrence of the 1 in 100 year floods.
Jonathan Webb Staffordshire Biodiversity Officer Staffordshire Wildlife Trust	General	<p>Thank you for consulting Staffordshire Biodiversity Project Officer. I am concerned that all LEAPs within Staffordshire be fully integrated with the Staffordshire Biodiversity Action Plan (SBAP) targets. I am concerned that targets for Staffordshire could be increased for Derbyshire.</p> <p>As it has been suggested by the Agency that LEAPs are one of the best instruments for achieving biodiversity targets and nature conservation, I feel that the Dove LEAP has relatively weak connections and mission statements for biodiversity and these need to be considerably strengthened.</p> <p>I enclose a list of suggested amendments and omissions for your consideration (see errors & omissions).</p>	Biodiversity is only a small part of the LEAP, detailed targets are therefore not always included.

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Appendix

Public Consultation Events

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Shows ~	Chatsworth Angling Fair	8/9 May
	Staffordshire County Show	2/3 June
	Rolleston Community Day	12 June
	National Forest Festival	19/20 June
	Cheadle Fair	17/18 July
	Bakewell Show	4/5 August
Displays ~	Uttoxeter Town Hall	10/21 May
	Cheadle Town Hall	1/11 June
	Cheadle Library	June
	Ashbourne Town Hall	14/25 June
	Burton Library	June
	Carsington & Tittesworth Reservoirs	June
Talks ~	Rolleston on Dove Community Council	2 August

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