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UPPER TRENT AREA

STATEMENT ON PUBLIC CONSULTATION

FOR THE DOVE CMP

JULY 1995

Consultation Report Published January 1995

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Please Contact: Jonathan Jenkin
Catchment Management Planning Officer
National Rivers Authority
Upper Trent Area
Sentinel House
9 Wellington Crescent
Fradley Park
Lichfield
Staffs WS13 8RR

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FOR THE DOVE CMP**

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1 INTRODUCTION

The NRA is committed to public consultation on all of its Catchment Management Plans (CMPs). CMPs allow the NRA to balance the competing requirements and interests of all users of the water environment. A fundamental part of catchment management planning is to work in partnership with all interested parties for the sustainable development of the water environment.

The report reviews the consultation to date on the Dove CMP Consultation Report. It outlines the responses received and how they have been taken into account in preparing the Action Plan.

2 REVIEW OF THE CONSULTATION PROCESS

2.1 Public Consultation

2.1.1 Public consultation has been ongoing since work commenced on the plan in July 1994. In August 1994 we wrote to 25 key external organisations and groups for comment on a list of initial issues and problems affecting the water environment in the catchment. The responses were considered and where appropriate incorporated into the Consultation Report.

2.1.2 The Consultation Report was launched on the 31 January 1995 at the Ashbourne Lodge Hotel in Ashbourne, Derbyshire. 189 delegates attended the event and each received a copy of the Report.

2.1.3 The launch marked the start of a formal two month consultation period. Reports were circulated widely to national and local groups MPs and MEPs, District and Parish Councils, angling associations, recreation organisations, schools, members of the public etc. Reports were displayed in all Libraries and Tourist Information Centres in the catchment. During the consultation period display boards promoting the catchment plan and inviting comment were placed at Burton upon Trent, Leek, Uttoxeter, Ashbourne and Werrington Libraries and at the offices of Staffordshire Moorlands District Council. Over 600 copies of the Consultation Report and 1,000 summary booklets were distributed over the two month period.

2.1.4 The launch and the consultation period was accompanied by press and radio coverage. There was radio coverage before, during and after the launch. The launch itself was covered by BBC Radio Stoke and BBC Radio Derby. Numerous press reports appeared in local papers, including the Derby Telegraph, Burton Mail, Evening Sentinel, the Ashbourne News Telegraph and the Cheadle Times and Echo.

2.2 NRA Regional Committees

2.2.1 Within the NRA, new arrangements have been created to involve NRA regional committees in the development of catchment plans. These arrangements came into force earlier in the year. A meeting was held at the start of the consultation period with representatives from each of the three committees (Flood Defence, Rivers and

Fisheries). The committees are made up of people from outside the NRA representing various interest and amenity groups.

Copies of the draft Action Plan were sent to the committee representatives and a meeting was held on the 9 June 1995. Their responses were considered and where possible incorporated into the Action Plan.

3 RESPONSES RECEIVED

- 3.1 Sixty two written responses were received from a wide variety of organisations and a number of individuals with an interest in the catchment. Most of the responses supported the objectives set out in the Report, the general vision and the concept of Catchment Management Planning. Three subject areas proved to be of particular interest; fisheries, canoeing and agriculture. The largest response was on fisheries issues which reflected the importance of the catchment to coarse and game fishermen. In response to the large number of letters on fisheries issues, a forum was held on the 27 April at the Upper Trent Area office, with invitations to all those who had made a written response on fisheries issues. This provided an opportunity for an open discussion between the NRA and interested groups. The main issues discussed included predation by cormorants and mink, the re-introduction of salmon into the River Dove and the return of otters.
- 3.2 The Consultation Report made few references to canoeing. Many groups wrote to explain that canoeing does take place on the River Dove and the River Churnet and requested that the NRA support greater canoe use. There was also concern that agriculture and the problems of pollution and land drainage were not given due prominence.
- 3.3 A summary of the comments received and interest shown in particular issues are detailed in table 1.

Table 1

Consultee	Comments	Issues & Options Mentioned
Alstonefield Parish Council	Toilets at Milldale should be connected to the mains foul sewer.	None
Ashbourne Fly Fishing Club	Re-introduction of salmon, levels of tourism north of Ashbourne and predation by cormorants, goosanders and mink.	Oppose 16
Atkins P	Water resources and development around Uttoxeter. Improvements in water quality in the Churnet should lead to an expansion in fly fishing. Salmon in the Dove could lead to an increase in poaching. Concern about mink.	Concern about 4 and 15 Oppose 16
Baker B	Salmon in the Dove.	Support 16
Bean D	Canoeing, concern that the British Canoe Union was not consulted.	None
Birdsgrove Fly Fishing Club	Salmon in the Dove. Poaching salmon could adversely affect the existing trout fishery. Concern over bank erosion. Predation by cormorants, mink and goosanders.	Oppose 16
Blue Circle Industries PLC	Abstraction discharge consents operated through HMIP.	None
Bolton MAB	Low flows in the Croxden Brook, reductions in abstraction.	Support 5 (in particular 5.3)
British Canoe Union (West Midlands) Region	Canoeing - access agreement with Burton Mutual Angling Association. Increase use of Marston Weir. Provision of car park at Marston. NRA may be asked to convene a meeting of the two sides.	Comment 15
British Waterways - Environmental & Scientific Services	Canal Water Quality - concern over long term water quality objectives.	None
British Waterways (Pennine and Potteries Waterway)	Navigation, water quality, blue/green algae and water resources.	None
Burton Canoe Club	Canoeing and the importance of the catchment for canoeists. The benefits of canoeing. Weir above Denstone and retention of access for canoeists on Dovecliff Weir.	Support 1, 2, 3, 4 11, 19 and 21 Comment 15, 16

Consultee	Comments	Issues Mentioned
Burton Mutual Angling Assoc	Operation of the Egginton Intake, maintenance of residual flows, flooding, Dovecliffe Weir and salmon in the Dove. Cormorants and predation - consider this is a major issue.	Support 2, 15 and 18 Comment 4, 11, & 17 Oppose 16
CBI	Protection of Leek aquifer and rural sewerage. Provision of sewerage on industrial estates.	General support for 1 and 3 but opposed to option 3.3 Comment on 7. Oppose 8.3.
The Cheadle Water Works Co Ltd	Concern over the categorisation of the Alton Groundwater Management Unit and the protection of water resources.	General support
Clowes TW	Reintroduction of salmon and the effect on the existing trout fishery. Strong local feeling against the proposal. Also concerns about poaching and cost.	Oppose 16
Collins M	Reintroduction of salmon. Impact of tourism and maintenance of water quality.	Oppose 16
CPRE (Staffordshire Branch)	Development of open land adjacent to waterways, impact of urbanisation on run off. Siltling of Rudyard lake. Blue/green algae.	General support
Derby & Staffordshire East MEP Phillip Whitehead		General support.
Derby City Council	Reintroduction of salmon, habitat diversity, otters at Dovedale, invasive plants Restoration of mineral sites. Impact of flood defence on wildlife habitats	Support 18, 19 Comment 16, 21 Oppose 20
Derbyshire Caving Assoc	Wetton Mill is popular for caving as is Ecton. More detail is required regarding the inputs into the Carboniferous Limestone Aquifer and outputs from the Aquifer.	None
Derbyshire County Council	Listed buildings adjacent to watercourses require joint action with NRA. Suggest NRA support for wildlife surveys of structures and bridges on rivers. Development of river corridors.	Comment 2, 4, 7, 8, 9 16 and 21 Support 11, 15, 17 and 18

Consultee	Comments	Issues Mentioned
Derbyshire Wildlife Trust	Support for the NRAs stance regarding water resources, water quality and protection of the flood plain. More depth required on Issue 18. On 19 the Trust has only limited funds. A full environmental impact study should be undertaken before a new footbridge on the River Dove is contemplated.	Support 2, 4, 7, 9, 11, 12, 13, 14 and 17 Comment 16, 18, 19, 20 and 21
English Nature - Peak District and Derbyshire Team	<p>Vision statement should consider sustainability. Policy for abstraction licensing should be widened.</p> <p>Additional Issues-</p> <ul style="list-style-type: none"> ● Protection of crayfish populations ● Control of caravan sites ● Discharge from Hartington Cheese Factory ● Agricultural pollution ● Improvement of upland pasture changing the nature of run off ● Sites of geological interest 	Support 4, 7, 17 and 19 Comment 16
English Nature (West Midlands)	<p>Issue 3 must include proper protection of existing habitats.</p> <p>Support the creation of lowland wet grassland, and allowing some areas to flood. Conservation programmes for agriculture need to be mentioned.</p>	Comment 3, 11 Support 18, 19 and 21
English Heritage		General support.
FWAG	A programme to promote environmental awareness amongst farmers is required. The plan should have highlighted the importance of unimproved and semi-improved grassland.	General support.
George Dutton Ltd	The history of the Ashbourne Airfield Estate and pointed to the lack of an adequate sewerage infrastructure. Also considered the need for adequate means of foul drainage for rural properties.	Support 7 and 8
Ginnisdell A	Concern over the current condition of Dovecliff Weir and the future of Clay Mills Fleam.	Comment 15
Hart A	Recreational touring canoeing was largely omitted from the plan. Proposals to re-introduce salmon should not adversely affect canoe access.	Comment 16

Consultee	Comments	Issues Mentioned
Hignett J R	Re-introduction of salmon. The genetic diversity of Brown Trout and the return of otters. The problems of visitor numbers also affects areas higher up the River Dove valley.	Oppose 16 and 10 Comment 17 Support 20
Hurst R	Pollution incidents, both air and water and salmon in the Dove.	Support 16
Leek & District Fly Fishing Assoc	Concern that the reintroduction of salmon would affect Rocester Weir.	Comment 16
Ministry of Agriculture, Fisheries and Food (MAFF)	<p>Corrections and omissions.</p> <p>The corporate aim for flood defence should be modified as follows:- "To reduce the risks to people and the developed and natural environment from flooding from rivers and the sea" - to take account of the Flood and Coastal Defence Strategy for England and Wales.</p>	None
Marchington Parish Council	Highlighted possible future large scale development in the Parish. Concern over potential for future pollution from Marchington Industrial Estate.	Comment 7, 8 and 12
Mawer JDB	Request for information.	None
NFU (West Midlands Region Staffs County Branch)	<p>Concern expressed over the ability of farmers to comply with NRA/MAFF guidelines given that slurry control system grants have been reduced.</p> <p>Compensation in no-spreading zones, needs to be considered.</p>	None
NFU - West Midlands	<p>The summary document was inadequate.</p> <p><u>Other Issues</u></p> <ul style="list-style-type: none"> - Derelict and opencast coal sites - Omissions and corrections 	<p>Comment 3, 5, 13</p> <p>Support 7, 10, 12</p> <p>Oppose 18 (Option 18.2)</p>
Oakamoor Parish Council	Flooding at Oakamoor from the River Churnet.	Support 13

Consultee	Comments	Issues Mentioned
Palmer AC	Nitrates leaching into potable supplies.	None
Peak Park Joint Planning Board	<p>Need to cross reference with Peak Park Management Plans. Would like to see greater emphasis on access and recreation.</p> <p>Other related issues:</p> <p>Milldale toilets Milldale path Pollution awareness Litter and waste management systems.</p>	Comment: 16, 20 Support 7
Pirie AHT	Re-introduction of salmon; concern over competition with existing trout populations. Difficulty in creating a worthwhile fishery.	Oppose 16
Plummer	Boating and watersports should be promoted.	None
Potteries Paddlers Canoe Club	Canoeing was not mentioned in enough detail and the Report does not reflect the level of canoeing that takes place.	None
Mr & Mrs D J Raymont	Flooding along the River Churnet & low flows needs to be considered.	Support 5, 13
Salmon & Trout Association. (Derbyshire)	Concern that the impact of introducing salmon in the River Dove will adversely affect the existing fishery. Suggested ways of improving genetic diversity. Concern over future abstractions. The management of the physical structure of the river should apply along its whole length. The return of otters should be accompanied by monitoring.	Oppose 16 Support 7, 15, 17, 18, & 19 Comment 4 & 2
Salmon & Trout Association. (Staffordshire)	<p>Concern over poaching and the effect of introducing salmon parr, but if the reintroduction was "natural" over a number of years no objection in principle.</p> <p>Rivers should not be stocked with rainbow trout.</p> <p>Concern over nitrate contamination.</p> <p>Concern that abstraction consents are too easily obtained.</p>	Comment 16 Support 15, 17, 19 Oppose 4

Consultee	Comments	Issues Mentioned
Severn Trent Water Plc	Highlighted the need to consider AMP2 guidelines. River Dove is important for water resources. The high quality of water in the catchment reflects major capital investment by the water company.	Comment 2, 3, 4, 5, 6, 7, 9, 10 Support 8, 15
Sheffield Trout Anglers Association	Concern about minck and support for measures to mark fish as part of ongoing investigations.	None
Smith A	Concern over issues affecting Uttoxeter, Bramshall Industrial Estate, water quality problems on the River Tean and the pressure for development in flood balancing areas.	Support 5, 8, 10, 12, 14, 16, 19 & 20
South Staffordshire Water	Water quality in the River Churnet should be maintained.	None
Stafford Canoeing and Watersports Club	Concern regarding the limited inclusion of canoeing in the report. Canoeing is a far more widespread activity in the catchment.	None
Staffordshire Moorlands District Council	The NRA to work with SMDC on joint actions. Concern over gravel washing using water from the River Tean.	General support
Standon Bowers Outdoor Education Centre	The outdoor education centre makes significant use of the River Churnet for canoeing purposes.	None
Stewart L	Canoeing is more extensive than indicated in the report. British Waterways should be prevailed upon to allow canoeing through the Frogghall tunnel.	None
TOPAC (Trentham Outdoor Pursuits Club)	Inadequate reference to canoeing particularly on the River Churnet.	None
Uttoxeter Town Council	Low flows on the Croxden Brook and foul drainage on Bramshall Industrial Estate. Water quality in the River Tean, flooding and gravel working in floodplain areas.	Support 5, 8, 10 Comment 12 & 14

Notes-

Catchment plans are public documents but it was not made clear in the Consultation Report that the content of all written responses would be publicised in this statement. A clarifying letter has been sent to all respondents and four organisations, ARC Central, The National Trust, The Ramblers Association and Thomas Boltons Ltd have requested that their responses remain confidential.

4 **CONSULTEE VIEWS**

4.1 Table 1 indicates the main concerns of the consultees. As a result of these comments several amendments have been made to the CMP and these appear in the Action Plan.

4.2 **New Issues**

4.2.1 One new issue (Issue 22) on groundwater quality has been added. The vulnerability of the Carboniferous Limestone aquifer in the northern end of the catchment (in the Peak National Park and adjoining areas) is a cause of concern both within the NRA and in comments that have been received. Rural development and agricultural activities should not result in pollution of the water resource. A new policy to control the discharge of sewage into the Carboniferous Limestone aquifer is being developed. Actions include the investigation of other pollution sources with the aim of minimising polluting discharges to ground.

4.3 **Options arising from the Consultation Process**

4.3.1 Issue 8 - Concern over polluting discharges has led to the proposal for an estate action programme (Action 8.2) which is tailored to each individual estate. The main action programme will take place on the Ashbourne Industrial Estate. Action 8.3 is in recognition that the provision of mains sewerage to the former military camps is unlikely to be provided in the short to medium term.

4.3.2 Issue 11 - Action 11.3. The Action Plan provides a commitment to a flood protection scheme if it proves to be required and is technically, environmentally and economically sound and sustainable.

4.3.3 Issue 13 - Action 13.3. The redundant bridge which may be causing the flooding problem may not be the only cause or the main cause. The Action has been amended to take this into account.

4.3.4 Issue 15 - Action 15.2. The technical study undertaken for the NRA on Dovecliff Weir recommended the reinstatement of the weir, a view supported by correspondence received.

4.3.5 Issue 16. This issue provoked more comment than any other. Most of the letters on this issue were opposed to the reintroduction of salmon or concerned about particular problems associated with reintroduction. It was the major issue discussed at the Fisheries Forum. The proposal is part of a wider initiative to develop the River Trent as a salmon fishery. This opposition has been considered and it was agreed to defer any decision pending consideration of a report undertaken by Hull University for the NRA on salmon in the River Trent, by the Regional Fisheries Advisory Committee (RFAC).

4.3.6 Any decision by RFAC would be followed by further consultation with all interested groups. Progress on this issue will be reported as part of the annual review.

4.3.7 Issue 10 - Action 20.1. The NRA has given a commitment to support a new footbridge downstream of the stepping stones and the removal of the existing lower bridge. Comments on this issue were divided. However any new structure will require planning permission and a footpath diversion order. We are aware that any change could prove contentious and that the proposal may prove unacceptable in the long term. Progress on this issue will be reported as part of the annual review.

4.4 Deleted Issues

4.4.1 Issue 14 has been deleted from the Action Plan. The issue concerned development pressures on flood balancing areas adjacent to Uttoxeter, and the option was to ensure that land used for flood balancing is not designated for development in the East Staffordshire Borough Local Plan. Representations were made at the public inquiry in November 1994 and the outcome is awaited. The NRA does not support new development in floodplains or flood balancing areas in principle. The Authority seeks to influence the planning process through the Planning Liaison Section. This work is part of day to day routine operational activities and has therefore been dropped as an issue.

4.4.2 To help to ensure that future development does not affect flood balancing areas, catchment planning guidance is provided in Section 4.3.6 of the Action Plan.

4.5 Other Issues Raised by Consultees

4.5.1 Three Issues proved to be of more general concern. These have not been taken forward into the Action Plan.

4.5.2 Predation by Cormorants and Mink. This issue was discussed at the Fisheries Forum and many of the letters received were critical of the NRA for not doing more to limit cormorant numbers in the face of a growing cormorant population in the catchment. The NRA does not have any powers to take action, the power rests with the Ministry of Agriculture Fisheries and Foods (MAFF) who can issue shooting licences. These licences will only be issued on the basis that serious damage is being caused to the fishery. The problem is defined by the extent of losses to a fishery. There is little firm evidence of proven "serious damage" in the catchment and the problem is not particular to the catchment. Mink do not present a major threat to fisheries interests.

4.5.3 Canoeing - The consultation report made very few reference to canoeing, which was a major omission. Many of the letters requested that the NRA support greater canoe use in the catchment. There are no legal rights to navigation in the catchment (except along the Caldon Canal) so the use of rivers for canoeing can only be carried out with the permission of riparian landowners. The NRA can act as a mediator between landowners, anglers and canoeists and this position is part of a nationally agreed policy. The NRA supports the expansion of water based recreation where established interests are not adversely affected. The policy is not catchment specific and is not therefore an issue to be resolved in this plan.

4.5.4 Agricultural activity. Several letters made reference to agricultural pollution. Pollution from agricultural sources is treated like all other pollutions and its control is part of our day to day routine activities using statutory powers. Changes in agricultural practice may be having an effect on the flow regime of the Rivers Hamps and Manifold and the upper reaches of the River Dove. A clear trend has not been established but monitoring and assessment will continue and will extend beyond the life of the Action Plan. Several letters requested additional emphasis be given to agricultural issues.

5 AMENDMENTS TO THE CONSULTATION REPORT

Table 2 shows the errors/omissions in the Consultation Report that have been highlighted by the responses received.

Table 2

Abbreviations

MAFF Ministry of Agriculture Fisheries & Foods

NFU National Farmers Union

STW Ltd Severn Trent Water Limited

SECTION	PAGE	ERROR/OMISSION	RAISED BY
1.1.4	5	Flood defence measures should always be technically environmentally and economically sound and sustainable.	MAFF
2.1.7	22	The NRA exercises general supervision over all matters relating to flood defence.	MAFF
2.1.9	22	Revised wording to describe ESA - See Appendix 1.	MAFF
2.1.10	23	The range of recreational activities should include canoeing. The Caldon Canal is the only watercourse with rights of navigation but it is not the only navigable watercourse in the catchment.	British Canoe Union Stafford Canoeing & Watersports Standon Bowers Outdoor Education Centre Mr L Stewart Trentham Outdoor Pursuits Club Mr D Bean Mr S Briggs Mrs A Hart
2.2	25	Flow gauge site on map 7 at Scropton on the River Dove should be deleted.	NRA - Hydrometric Section

SECTION	PAGE	ERROR/OMISSION	RAISED BY
3.2	38	Issue 12 - reference should be made to "indicative standards of protection" not "standards of service".	MAFF
3.2	38	Issue 13 - Any scheme must be technically sound and environmentally acceptable as well as economically justified.	MAFF
3.2	41	Issue 19 - Loss of habitat as well as pesticides has affected otter numbers.	MAFF
3.2	41	Issue 21 - Paragraph 2 should be reworded "... including the possibility of <u>relocating a footbridge nearer to the stepping stones to allow pedestrians to cross in high water conditions and to reduce erosion problems below Thorne Cloud</u> ".	Peak National Park
3.3	46	The cost of stream bed lining and pool lining is not just the responsibility of landowners.	NFU
3.8	47	8.3 - Responsibility for pollution audits will lie with local authorities and the NRA.	NRA Environmental Quality
4.1.2	60	Flooding and sewerage problems exist in the vicinity of the River Tean particularly around Beamhurst.	NFU West Midlands
4.1 Table 3	64	Derbyshire Minerals Plan Consultation Draft published Autumn 1994.	Derbyshire County Council
4.2.2	65	Opencast sites in Cellarhead omitted.	NFU West Midlands
4.5.1	76	Free and confidential advice to farmers is available through ADAS on pollution prevention measures.	MAFF
4.5.1	76	Codes of Good Agricultural Practice for water, air and soil are available free.	MAFF/NFU
4.5.1	76	Farm diversification <u>may</u> result in pollution and water resource problems.	MAFF
4.5.2	76	Revised wording proposed by MAFF - See Appendix 1	MAFF
4.5.2	76	Other schemes include Countryside Stewardshire and the use of set-a-side.	English Nature West Midlands
4.5.2	76	NRA should encourage farmers to participate with MAFF in the voluntary production of farm waste plans.	NFU
4.5.4	77	Environmental Requirements Water Quantity - sufficient water resources should be maintained for the reasonable needs of agricultural users.	NFU
4.6.2	79	The Egginton abstraction is not an export from the catchment but a large abstraction at the downstream limit of the catchment. Its main impact is on the River Trent. The catchment receives imports of water as well as exports out of the catchment.	STW Ltd

SECTION	PAGE	ERROR/OMISSION	RAISED BY
4.7.1	84	"Standards of Service", should read "Indicative Standards of Protection".	MAFF
4.7.2	86	Flood warning reaches are indicated on Map 14 not Map 15.	NRA Flood Defence
4.9.1	94	Map 17 - Swinehole Wood and Black Heath SSSI and Brownend Quarry SSSI - wrongly worded.	English Nature
4.9.1	94	Map 17 - Derbyshire Wildlife Sites and Regionally Important Geological Sites omitted.	Derbyshire County Council
4.9.2	96	Section on geology sites of importance omitted.	English Nature (Peak District and Derbyshire Team)
4.10.2 Table 6 Map 18	98 - 100	Caving omitted as a recreational activity in the catchment (Wetton Mill and Ecton).	Derbyshire Caving Association
4.10.2 Table 6 Map 18	98 - 100	<p>Recreational canoe touring takes place on the River Dove between Tutbury and Newton Solney in March and there is access to the river at other times through an access agreement between the British Canoe Union (BCU) and the Burton Mutual Angling Association.</p> <p>The River Churnet is used for recreational canoe touring between Cheddleton and Rocester. It is also an important canoe training river used by secondary schools, scouts, disabled groups, Duke of Edinburgh Award scheme participants etc. A popular circuit is from Froghall along the Caldon Canal and down the River Churnet from Consall Forge to Froghall.</p> <p>The stretch of river alongside Oakamoor Picnic site and recreation ground has been used since 1969 for the British Polytechnics Sports Associations Canoe/Kayak Championships and the BCU National 4/N slalom event. There are also many other regional and club events in this location.</p>	<p>British Canoe Union Mr D Beau Trentham Outdoor Pursuits Club Mr L Stewart Standon Bowers Outdoor Education Centre (Staffs CC) Stafford Canoeing and Watersports Club Potteries Paddlers Canoe Club Mrs A Hart Mr S Briggs</p>
4.11.2	102	The problem of piscivorous birds omitted.	MAFF
5.2.1	123	Vulnerability of the Carboniferous Limestone Aquifer needs highlighting.	English Nature (Peak District & Derbyshire)
5.2.2	124	Map required showing the location of major springs that discharge accumulated groundwater from the Carboniferous Limestone into rivers and the location of discharges <u>into</u> the Carboniferous Limestone.	Derbyshire Caving Association
5.4.1	130	WLMPs required for the Churnet Valley SSSI and the Old River Dove/Marston on Dove SSSI (to be undertaken by NRA).	MAFF

SECTION	PAGE	ERROR/OMISSION	RAISED BY
5.4.1	130	Indicative Standards of Protection are based on guidance given in "Project Appraisal Guidance Notes" (MAFF - March 1993).	
5.4.2	130	Habitat - reworded see Appendix 1.	MAFF
5.4.2	131	Landscape - first two paragraphs reworded - see Appendix 1.	MAFF
5.4.2	131	Targets - protection of natural features to include <u>marginal</u> and emergent vegetation.	Derby City Council
5.4.5 Table 14	135	Indicative standards are <u>not</u> a "starting point".	MAFF
Appendix 2	141	EC Habitats Directive (92/43EEC) omitted.	MAFF

APPENDIX 1

REWORDING SECTION 2.1.9 PAGE 22

A significant area of the catchment is designated by MAFF as The South West Peak Environmentally Sensitive Area (ESA). The ESA scheme encourages farmers to help safeguard areas of the countryside where the landscape, wildlife or historic interest is of national importance. This ESA has been designated because of its remote, open moorland of heather, grass, blanket bog and the associated areas of enclosed grassland.

REWORDING OF SECTION 4.5.2 PAGES 76/77

Agriculture is the major land use. A significant part of the upland area of the catchment is designated by MAFF as The South West Peak Environmentally Sensitive Area (ESA). The ESA scheme encourages farmers to help safeguard areas of the countryside where the landscape, wildlife or historic interest is of national importance. The South West Peak ESA has been designated because of its remote, open moorland of heather, grass, blanket bog and the associated areas of enclosed grassland.

Improved awareness of the consequences of farm pollution by the farming community has led to a substantial decrease in pollutions associated with inadequate storage facilities. However, there have been increased in pollutions resulting from the spreading of farm wastes onto land. Problems are more likely to arise if excessive amounts of farm waste have been applied to the land; waste has been spread in unsuitable locations, for example steeply sloping land; or in unsuitable conditions, eg during very wet weather. Inappropriate disposal may contribute to elevated ammonia levels in the River Dove. This problem occurs mainly during the winter months. Elevated ammonia levels have caused the public water supply abstraction at Egginton to be shut down periodically.

Agro-chemicals are more commonly associated with arable cropping. Changes to European agricultural policy have resulted in an increased area of land Set-Aside and a decreased area of arable crops. The diffuse nature of this type of pollution makes it very difficult to pinpoint the source and to provide effective remedial measures.

In some parts of the country, intensive use of nitrate based fertiliser has led to high levels of nitrate in water supplies. Currently this is not a problem in either public or private water supplies and there are no designated Nitrate Sensitive Areas or proposed Nitrate Vulnerable Zones in the catchment.

REWORDING OF SECTION 5.4.3 PAGE 130

Habitat

The catchment has a high value for conservation and landscape, including part of the Peak National Park, the South West Peak ESA and a very high concentration of SSSIs and water dependant SINCs (Map 17). Detailed information on the habitat types, fauna, flora and archaeology can be found in Section 4.9.

REWORDING OF SECTION 5.4.2 PAGE 130/131

Landscape (First Two Paragraphs)

Whilst the majority of the catchment has no formal landscape protection it has a high landscape value, recognised by the designation of extensive non-statutory Special Landscape Areas by Local Authorities and of the South West Peak ESA by MAFF.

The NRA will seek to protect and promote local landscape character in all its operations through Environmental Assessment and its consents and licensing duties. In this way landscape character can be protected and/or enhanced, not only in the Peak District National Park, the South West Peak ESA and the Special Landscape Areas, but also elsewhere in degraded landscape locations.