

**BEDFORD OUSE (LOWER REACHES)  
LOCAL ENVIRONMENT AGENCY PLAN**

**Statement of Consultation**

November 1999

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**BEDFORD OUSE (LOWER REACHES) LEAP  
STATEMENT OF CONSULTATION**

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## 1.0 INTRODUCTION

The Bedford Ouse (Lower Reaches) Draft Local Environment Agency Plan (LEAP) was launched in February 1999. This marked the beginning of a three-month consultation period.

We are committed to public consultation and encourage comment from all interested parties and the general public. We believe it is important that all responses to the Draft LEAP are recognised and acted upon, as this will influence the LEAP process and help develop partnerships.

We have therefore produced this Statement of Consultation, which lists the responses received during the consultation period and aims to:

- Give consultees feedback on how their comments have been considered and, if appropriate, incorporated into the LEAP; and
- Avoid giving a detailed Agency response to each individual point raised by consultees – concentrating instead on specific issues.

Table 2 in Section 4 below describes the feedback received, including errors and omissions.

## 2.0 FORMAL CONSULTATION

To publicise and encourage formal responses to the Draft LEAP, the following were undertaken:

Distribution – The Draft LEAP was distributed to over 180 organisations and individuals with a request for written feedback.

Promotion – Documents and poster displays were sent to libraries and Local Authorities. Press releases were issued and radio interviews were given.

## 3.0 AREA ENVIRONMENT GROUP (AEG)

The Great Ouse AEG consists of a group of people from different walks of life, who have broad experience and interest in environmental matters and who represent our customers. AEG members include, for example, river users, Local Authority representatives, farmers and industrialists. One of the roles of the AEG is to advise and comment on the LEAP process and discuss priorities, proposals and key issues within the Plan. Initially, a 9 member Sub-Group was appointed to work on the Bedford Ouse LEAP with the Agency Project Team, providing input and detailed feedback at every stage of its production. A list of current members can be found at Appendix C.

## 4.0 RESPONSES

During the consultation period we received one verbal and 26 written responses to the Draft LEAP (see Appendix A), which are outlined in the tables below. All responses were acknowledged. One letter made no comment. All other responses were considered whilst developing the LEAP in a way that we believe reflects a reasonable balance between the opinions expressed and our desire to ensure that the plan is feasible and robust.

Overall the Draft LEAP was well received and favourable comments were made on its presentation and clarity. The key messages coming through in the responses included:

- Concern about the availability of water resources for the environment, abstractors, recreational use, and increases in development;
- The need to give stronger emphasis to a wider range of recreational activities; and
- The importance of partnership working to maximise the benefits that can be achieved.

The number of responses made on each issue is shown in Table 1. Comments about other aspects, such as layout and content of the Draft LEAP, were also received. All are summarised in Table 2, together with our replies.

**Table 1: Number of Responses Made on Each Issue**

| ISSUE NO | ISSUE TITLE  | NUMBER OF RESPONSES |
|----------|--|---------------------|
| 1        | Future demand for water abstraction cannot be met from local groundwater resources or by using surface waters in the summer        | 13                  |
| 2        | Ensuring that rivers and wetlands are not adversely affected by abstraction  | 8                   |
| 3        | Concern that the operation of the Rivers Hiz and Oughton Support Scheme is not fully meeting its objectives to alleviate low flows | 4                   |
| 4        | Failure of the River Bedford Ouse and associated tributaries to achieve fish biomass targets                                       | 2                   |
| 5        | Aquatic habitat needs to be restored or improved to benefit fish stocks and other associated wildlife                              | 5                   |
| 6        | River and floodplain habitats are degraded   | 9                   |
| 7        | Houghton structures require refurbishing to maintain river levels in line with WLMP recommendations                                | 10                  |
| 8        | There is a lack of public access to the River Great Ouse for recreational activities   | 11                  |
| 9        | The impact of Cardington Canoe Slalom Channel on the ecology of surrounding watercourses   | 9                   |
| 10       | Public concern over brick making and waste disposal sites in the Marston Vale  | 3                   |
| 11       | The scale of misuse of exempt waste management sites is unknown  | 5                   |
| 12       | There is a lack of information on the land spreading of wastes   | 5                   |
| 13       | Eutrophication of Grafham Water and the Rivers Great Ouse, Ivel, and Hiz   | 10                  |
| 14       | A number of river stretches fail to meet their river ecosystem targets   | 5                   |
| 15       | Contamination of potable water supply by nitrates  | 6                   |
| 16       | Identification and remediation of contaminated land  | 5                   |
| 17       | There is traffic congestion at locks during the summer period  | 9                   |
| 18       | There is a problem with vandalism of Agency lock structures  | 7                   |
| 19       | Public concern over the findings of the Eurohazcon Study   | 4                   |
| 20       | Implementation of the Bye Report recommendations   | 6                   |
| 21       | Review of current standards of flood protection  | 4                   |
| 22       | Non main river flooding  | 3                   |

**Table 2: Summary of Consultation Responses**

The responses from Consultees are given in chronological order, and all but the 'General Comments' are grouped under the subject headings that appeared in the Draft LEAP. The actual comments may have been edited and paraphrased for the sake of brevity; meanings may therefore have changed slightly.

**General**

| CONSULTEE<br>(LETTER DATE)                             | COMMENTS  | RESPONSE  |
|--|---|---|
| Alconbury & Ellington IDB<br>(08.03.99)                | The Board would have liked a more positive statement of the Agency's determination to control flood risk in the area. The Plan lacks a commitment to ensure appropriate levels of maintenance of flood control systems.   | Noted and taken forward in the LEAP.  |
| Ouse Valley River Club<br>(08.04.99)                   | The Club hopes that the strong words of the LEAP are not hollow. Navigation is an important feature and must be given correct priority.<br><br>Matters that must be addressed include building in floodplains and the monitoring and maintenance of water levels to allow safe navigation.                              | Noted.<br><br>Noted.  |
| Marston Vale Community Forest<br>(15.04.99)            | Although the Draft LEAP is not a statutory planning document, it is important that steps are taken to lessen development impacts in the Kempston/Biddenham/Bromham area, and this issue should be included.<br><br>The Community Forest team wish to be included as consultees for any Agency Plans in the Forest area. | Whilst we generally support the statement, the issue of development impacts rests with Local Planning Authorities (LPAs). We support LPAs in their decision making process.<br><br>Noted.   |
| CPRE - Mid Beds<br>(23.04.99)                          | The document is well designed. The Draft LEAP is a shining example of clarity.  | Noted.  |
| Bedford Group of Drainage Boards<br>(10.05.99)         | The map at the front of the document is misleading; the Rivers Hiz, Hit and Flit are not shown correctly. The Boards advise use of the map facing page 14.  | In accordance with the Agency's national guidelines for LEAPs, base maps show Main Rivers only.   |
| English Nature - Beds, Cambs & Northants<br>(12.05.99) | English Nature would like additional maps to be included to aid understanding of the Issues.<br><br>It would be helpful if watercourses referred to in the text were named on the maps.   | These maps can found in the Environment Overview (£50) which is available from this Office.<br><br>In accordance with the Agency's national guidelines for LEAPs, base maps show (and name) Main Rivers only, although some additional watercourses are included on the Issues map. More detailed maps are contained in the Environment Overview. |
| GOBA<br>(13.05.99)                                     | The Draft LEAP stresses issues of water supply and conservation, but makes little mention of how and from where extra water can be provided. Navigation must be taken fully into account when decisions are made.   | Noted. Mains water can be supplied from outside the LEAP area using Anglian Water Services' (AWS) Ruthamford scheme (which links supplies between Rutland, Grafham and Pitsford reservoirs). Navigation is taken into account when abstraction licences are considered.   |

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS  | RESPONSE  |
|--|---|---|
| Swavesey IDB<br>(14.05.99)                               | The Board is concerned that any development proposals that outfall to the Swavesey Drain system could prejudice its ability to evacuate water from the District via High Causeway pump. Discharge from the Cambourne development via Uttons Drove STW is of particular concern.   | The Agency has advised AWS to investigate all possible options for disposal of discharges and to liaise closely with IDBs at an early stage.  |
| South Bedfordshire District Council<br>(14.05.99)        | It is unclear whether the LEAP is concerned with 'Main River' only. If it included other watercourses, consideration could be given to areas such as Barton Springs, which would benefit from qualitative improvement works.  | As far as water quality is concerned, all watercourses are considered for improvement works within the LEAP.  |
| W B Carter<br>(20.05.99)                                 | My recent report entitled 'Observations on and Recommendations for the Operations of the Great Ouse' gives a background to many of the problems and ideas to overcome them. It went to the Deputy Prime Minister and was commended by British Waterways. Copies are still available, if required.   | Noted.  |
| Sport England<br>(21.05.99)                              | The 'Water Recreation Strategy, Zone 1' report, prepared by the former Eastern Council for Sport & Recreation and adopted by Sport England, contains a number of recommendations and proposals of relevance to this LEAP. (Copy provided)   | We do consider the content of this report regularly and fully support the Zone 1 Strategy.  |
| British Canoe Union<br>(27.05.99)                        | <p>Canoeing is one of the less expensive watersports, attracting paddlers of all ages from all walks of life and is popular with those with disabilities. The canoe causes no erosion, noise or pollution, and leaves no trace of its passing. It is BCU's policy to inform members about conserving, respecting and enjoying the natural environment.</p> <p>The LEAP provides an opportunity to progress towards giving canoeists a reasonable and equitable share of the limited waterway resources. BCU urges the inclusion of policies that actively encourage agreements enabling canoeing to take place and the bringing together of parties to potential agreements, with the Agency acting as facilitator if required.</p> | <p>Noted.</p> <p>Noted. The Agency has recently produced a booklet 'agreeing access to water for canoeing' on behalf of Angling and Canoeing Liaison Group and has acted as a facilitator between angling clubs, riparian owners and canoeists in Central Area.</p> |
| The East Anglian Waterways Association Ltd<br>(27.05.99) | The Association welcomes and supports the Agency's general aims such as securing improvements in water quality and enhancing biodiversity.  | Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)                        | The Council congratulates the Agency on the design and presentation of the document and advises that it is among the best of the many publications that the Branch scrutinises.   | Noted.  |

| CONSULTEE<br>(LETTER DATE)                         | COMMENTS  | RESPONSE   |
|--|---|--|
| Ivel Valley<br>Countryside Project<br>(28.05.99)   | <p>The following issues could be included and addressed in the Plan:</p> <ul style="list-style-type: none"> <li>• Conservation of heritage features on the River Ivel Navigation;</li> <li>• Co-ordination of water level management by private owners of sluices on the Ivel and tributaries;</li> <li>• Specific targets for priority Biodiversity Action Plan (BAP) species and habitats;</li> <li>• Monitoring of the BAP process and targets;</li> <li>• Effective liaison with Beds &amp; River Ivel IDB over management of non-Main River sections of the River Ivel and integration in the Plan.</li> </ul> | <p>The Agency is not the Navigation Authority on this disused navigation. However, we have a duty to consider the impact of all our operational, regulatory and advising activities upon archaeology and heritage.</p> <p>We are at present considering a project to identify constraints and opportunities for habitat enhancement in this area. The project would include a review of options such as this for water level management.</p> <p>Bedfordshire and Luton BAP will include specific targets in the Habitat Action Plans and Species Action Plans for priority BAPS. Monitoring of the process is a key function of the BAP initiative.</p> <p>Agency staff routinely liaise with IDBs, and every effort is made to ensure that IDB and Agency staff keep each other informed of planned work.</p> |
| Cambridgeshire<br>County Council<br>(01.06.99)     | <p>The quality and content of LEAPs is continually improving. The Issues and Proposals tables are in a user-friendly format.</p> <p>However, some proposals do not identify positive actions and suggest monitoring or studies only. LEAPs could be more pro-active in this respect.</p>  | Noted.   |
| Mid Bedfordshire<br>District Council<br>(02.06.99) | The Agency is aware of the scale of proposed housing and industrial development in Mid Beds District, but the Draft LEAP makes little reference to Bedfordshire and focuses mainly on Cambridgeshire.   | We intended to give a brief but balanced view, indicating the level of future development proposed for the area and how it is being managed. Future housing requirements were identified and what may be considered the most significant development proposals in the Plan area, ie the Elstow Storage Depot redevelopment and development to the west of Stevenage. Additional details will be included in the LEAP.  |

## Vision for the LEAP Area

| CONSULTEE<br>(LETTER DATE)                           | COMMENTS   | RESPONSE  |
|--|--|---|
| South Bedfordshire<br>District Council<br>(14.05.99) | 'Realising recreational opportunities' is part of the Vision, but is poorly reflected in the Issues etc. Stronger emphasis should be given to maximising the recreational potential of river corridors. This could be combined with an assessment of their existing and enhanced biodiversity potential.   | <p>The Agency has clear duties when managing the river for boaters and anglers, but we have no statutory powers relating to access or other recreational activities. We constantly seek appropriate recreation projects, associated with inland waters, to become involved with and promote. The majority of these projects tend to be initiated and led by local authorities or landowners. We have minimal land holdings in the LEAP area, but we do monitor these and seek to improve access, usage and ancillary facilities.</p> <p>The Agency has undertaken river corridor surveys of Main Rivers within the LEAP area. These surveys have identified locations of, for example, otters, water voles, native crayfish and habitats. This information is used by the Agency when planning maintenance and capital schemes.</p> |
| Cambridgeshire<br>County Council<br>(01.06.99)       | <p>The long-term vision needs to be broader; it currently focuses largely on water-related issues.</p> <p>There should be more commitment to biodiversity and BAP implementation in the short term. It is hoped that the Agency will support and promote creation of a County Biological Records Centre.</p> <p>Walking is included in the short-term vision but not in any of the Options for Enjoyment of Waterways or opportunities for partnership working. As landowner, the Agency could create more paths and lead by example. The Council welcomes all opportunities for partnership working with the Agency and invites its support of the Parish Paths Partnership Scheme.</p> | <p>Noted.</p> <p>The Agency is fully committed to the BAP process in Cambridgeshire and Bedfordshire, and has contributed funding to the co-ordinator posts for both counties. We fully support the creation of a County Biological Records Centre for Cambridgeshire. Conservation staff are involved in funding initiatives, and the Agency has hosted a number of meetings.</p> <p>Noted and taken forward in the LEAP.</p>  |

## Chapter 1 Introduction

| CONSULTEE<br>(LETTER DATE)    | COMMENTS   | RESPONSE |
|-------------------------------|--|----------|
| IWA - Cambridge<br>(15.05.99) | Chapter 1 outlines the Agency's Vision and Role and the massive tasks it faces; public awareness of the issues is essential, and Cambridge IWA is willing to help. | Noted.   |

| CONSULTEE<br>(LETTER DATE)                                    | COMMENTS  | RESPONSE |
|---|---|----------|
| Huntingdon Canoe Club & Cambs Canoeing Association (03.06.99) | 1.0 'Our aims': The Agency should be attempting to improve river navigation in the broadest sense; unpowered craft can navigate 'unlocked' waters as well. The clubs appreciate Agency support for access on backwaters and improvements to canoe portages (see comments on Issue 8). | Noted.   |

## Chapter 2 The Bedford Ouse Area

| CONSULTEE<br>(LETTER DATE)                  | COMMENTS  | RESPONSE  |
|---|---|---|
| Bedford Group of Drainage Boards (10.05.99) | The Boards advise that a written reference to IDBs, and a map of their areas, should be included.   | Noted. Written reference to the IDBs will be included in the LEAP but a map of their areas has not been included.   |
| Anglian Water Services Ltd (25.05.99)       | Water Utility Companies (page 10): The water supply companies serve all of the <u>area</u> . A small number of <u>properties</u> are not connected to the mains and therefore use private supplies. Anglian Water Services provide sewerage services for the whole area.  | Noted and taken forward in the LEAP.  |
| Ivel Valley Countryside Project (28.05.99)  | Page 8, para 3: Given its recreational significance, reference should be made to the recently launched Kingfisher Way.  | Noted and taken forward in the LEAP.  |
| Cambridgeshire County Council (01.06.99)    | <p>There is no mention of gravel extraction in Cambridgeshire, especially Needingworth Quarry's possible restoration to reedbeds and public access and recreation opportunities, nor of potential major new development at Alconbury.</p> <p>Key Details should include the number of County Wildlife Sites and length of footpath.</p> <p>Reference could be made to the Ouse Valley Way Walk, Hinchingsbrooke Country Park, Landscape 2000 Project, Anglian Water/Cambs Wildlife Trust Willows Project, and published state of environment reports.</p> <p>On page 10 it states that character and natural areas are shown on Map 3; that map shows site specific issues.</p> | <p>The Over/Willingham . Needingworth restoration proposals are mentioned under Issue 6 and Chapter 4, Theme 9: Enhancing Biodiversity.</p> <p>As far as the development at Alconbury is concerned, at the present time the planning application has been refused and the applicant has not lodged an appeal against the decision.</p> <p>The Key Details will indicate that there are approximately 300 County Wildlife Sites in the LEAP area, but we do not have the exact number or the specific lengths of footpaths.</p> <p>Noted and where possible taken forward.</p> <p>Noted. The relevant map was omitted, in error, but will be included in the LEAP.</p> |

### Chapter 3 Issues and Proposed Options

| CONSULTEE<br>(LETTER DATE) | COMMENTS  | RESPONSE  |
|----------------------------|---|---|
| W B Carter<br>(20.05.99)   | Nine themes are highlighted. Surely flood prevention should be added. | The themes identified are set nationally; flood defence issues are related to the theme of Integrated River Basin Management. |

#### 3.1 Summary of Issues

| CONSULTEE<br>(LETTER DATE)                    | COMMENTS   | RESPONSE   |
|---|--|--|
| Anglian Water Services Ltd<br>(25.05.99)      | Map 3: Insert 'not' before 'adversely affected' in the text for Issue 2.   | Noted. This typographical error will be corrected in the LEAP.   |
| Ivel Valley Countryside Project<br>(28.05.99) | Page 13: The Plan should include, as an appendix, a summary of the entire Bedford Ouse Catchment Management Plan (CMP) issues and progress, to show how issues have been integrated, which have been resolved and which are new.   | In the Draft LEAP, each issue brought forward from the CMP has been highlighted in the introductory text.  |
| Cambridgeshire County Council<br>(01.06.99)   | Map 3: Issue 2 should read ' <i>...not adversely affected...</i> '.<br><br>Given the wide-ranging implications of climate change, it is disappointing that the Agency does not include this as a major issue and identify options for action. (See also comments on Theme 1, Chapter 4.) | Noted. This typographical error will be corrected in the LEAP.<br><br>The Agency recognises that climate change is a global concern. Although we address it at a strategic level, eg National Water Resources Strategy and Flood Defence Planning, there are no projects specific to this LEAP area. |

#### 3.2 Management of Water Resources

| CONSULTEE<br>(LETTER DATE) | COMMENTS   | RESPONSE  |
|----------------------------|--|---|
| W B Carter<br>(20.05.99)   | Anglian Water has won contracts to supply water outside its geographical area, and believes competition will bring unlimited business opportunities. No doubt they will wish to take water at flows below that set in the Great Ouse Water Bill. They should be warned now that no more water will be available to them. | The Agency and public water supply companies liaise regularly about the water resources situation.<br>In March 1999, the water companies submitted their water resources plans showing how they intend to provide public supplies to the year 2005. AWS plan to meet future needs through a combination of managing demands with metering and leakage control and some developments to make greater use of existing licences. |

**ISSUE 1 FUTURE DEMAND FOR WATER ABSTRACTION CANNOT BE MET FROM LOCAL GROUNDWATER RESOURCES OR BY USING SURFACE WATERS IN THE SUMMER**

| CONSULTEE<br>(LETTER DATE)                              | COMMENTS  | RESPONSE  |
|---|---|---|
| CPRE - Mid Beds<br>(23.04.99)                           | <p>Proposal 2 must be implemented and a water grid established, in the long term.</p> <p>Proposal 3 should be pursued.</p> <p>Proposal 4 should be prioritised.</p>   | <p>Noted, although this is an expensive option and has several disadvantages, as highlighted in the Draft LEAP.</p> <p>Noted.</p> <p>This forms part of the groundwater investigation and modelling strategy. Re-defining the policy is the last stage in the process.</p>  |
| Bedford Group of<br>Drainage Boards<br>(10.05.99)       | Proposal 1 – Store water: ‘Partners’ should include IDBs.   | Noted and taken forward in the LEAP.  |
| English Nature - Beds<br>Cams & Northants<br>(12.05.99) | <p>Proposal 1: English Nature (EN) is keen to see habitat creation in connection with water storage.</p> <p>Proposal 2: It is important to note that water transfer schemes may have conservation implications.</p> <p>Proposal 3: EN supports this.</p> <p>Proposal 4: EN welcomes the development of a policy for use of Woburn Sands aquifer that secures the needs of dependent wetlands.</p> <p>Proposal 5: The Habitats Directive requires the UK to avoid deterioration of natural habitats and those of species for which areas have been designated.</p> | <p>Noted. This is promoted where appropriate, although in some cases it is not a practical option.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>  |
| GOBA<br>(13.05.99)                                      | No water should be abstracted to the detriment of river levels during the boating season.   | Water levels and flows required by all water users of the water environment are taken into account in the licence determination process.  |
| IWA - Cambridge<br>(15.05.99)                           | <p>This is a long-standing concern.</p> <p>Proposal 1 is to be commended, but the effect of abstraction on downstream siltation needs to be considered. Reservoirs must be designed to minimise evaporation.</p> <p>Proposal 2, to import water, has the IWA’s greatest approval, subject to the environmental impacts mentioned.</p>   | <p>Noted.</p> <p>Proposals for abstraction during winter are subject to full technical assessment, including consideration of the impacts on the siltation/geomorphology of the river. Reservoir design is considered as well, although the Agency has no statutory powers under the Water Resources Act 1991 (WRA91) with respect to this.</p> <p>Noted.</p> |

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS  | RESPONSE   |
|--|---|--|
| Anglian Water Services Ltd<br>(25.05.99)                 | <p>General agreement; however, Anglian Water forecasts no increase in demand by existing customers, due its policies for demand management.</p> <p>The supply from Grafham to Three Valleys Water Co is expected to increase.</p> <p>Summer water availability in the Bedford Ouse is dependent on augmentation of flows by the return of treated effluents. Protection of the Anglian Water abstraction for Grafham would only be implemented in drought conditions. Grafham Water is primarily a winter storage reservoir, although summer flows contribute a significant part of its yield.</p> <p>There are no plans to increase winter storage for public water supplies.</p>  | <p>Noted. We intended to indicate that if licences were already fully utilised development could be constrained <u>unless</u> other measures were taken. Information about demand management will also be included in the LEAP.</p> <p>Noted.</p> <p>Noted. (In this LEAP area, a winter storage reservoir is a reservoir that is filled only between 1 November and 31 March).</p> <p>Noted.</p>  |
| The East Anglian Waterways Association Ltd<br>(27.05.99) | <p>The Association is concerned about increasing demands for abstraction and supports any steps to reduce demand on water supplies.</p> <p>Importing water from areas of surplus sounds attractive but can lead to problems, as is now being seen in the Agency's Ely Ouse area with the volume that must be supplied to Essex and Suffolk.</p>   | <p>Noted – in most parts of the LEAP area, demands for additional summer water cannot be considered.</p> <p>Transfers are an important aspect of strategic management to make best use of water resources. The Ely Ouse-Essex transfer is effective and strictly controlled to provide water in Essex, while protecting the environment and other water users in the Ely Ouse.</p>   |
| CPRE – Bedfordshire<br>(27.05.99)                        | <p>Proposal 1: Even though artificial habitat creation may have some conservation benefit, the net environmental effect of major new reservoir construction is negative. This option should not be pursued.</p> <p>Proposal 2: Water transfers should be considered, subject to their environmental effects.</p> <p>Proposal 3: This option is definitely supported, although the Agency has limited powers.</p> <p>Proposal 4: This can be pursued provided at-risk surface water flows are increased or protected. Abstraction should not be increased without this balancing advantage.</p> <p>Proposal 5: The Branch trusts that the Agency will recommend limits to built developments where water resources are insufficient.</p> | <p>This refers mainly to smaller-scale reservoirs; however, a number of major reservoirs in East Anglia (e.g. Grafham Water and Rutland Water) are SSSIs.</p> <p>Noted.</p> <p>Noted. The Agency tries to advise and influence through the planning process.</p> <p>The review of the groundwater resources and the licensing policy will take the needs of the environment into account. Surface water flows would not be compromised in order to allow additional abstraction.</p> <p>The Agency does liaise with local planners to advise on the water resource situation. In this LEAP area, it is considered that there is sufficient water available under <u>existing</u> licences to support the proposed development.</p> |

| CONSULTEE<br>(LETTER DATE)                       | COMMENTS  | RESPONSE  |
|--|---|---|
| Ivel Valley<br>Countryside Project<br>(28.05.99) | Water abstraction demands for new developments in the Ivel valley and north Hertfordshire are of concern. Upstream springs and associated sections of the Ivel already run dry in summer. In supporting Proposal 4, reference should be made to protection of the Chilterns aquifer.  | Noted.  |
| Cambridgeshire<br>County Council<br>(01.06.99)   | <p>The Council supports actions to help reduce demand and improve resource management, but is concerned that statements in the LEAP contradict the water companies' and the Agency's submissions that even the higher levels of housing growth up to 2016 could be supplied. The position regarding future development requires clarification.</p> <p>As 'Mineral Planning Authority' (MPA), the Council is concerned about the cumulative impact of extracting minerals to create winter water storage reservoirs. The MPA would like clarification of Agency procedures.</p>  | <p>Noted. It is considered that the proposed developments can be supplied by managing demands with metering and leakage control and some developments to make greater use of existing licences. The text indicates that it is unlikely that new licences for <u>additional</u> water can be granted.</p> <p>Noted. The Agency is charged with assessing the impacts of abstraction for both filling and abstracting from a reservoir. We have some powers to control de-watering during construction and we advise applicants to contact the County Council about planning permissions.</p> |
| RSPB<br>(01.06.99)                               | The RSPB supports Proposal 1 to provide more storage areas with the potential to create additional nature conservation habitat.   | Noted. Proposals for creation of habitat associated with winter storage reservoirs are supported by the Agency where they are practical.  |
| Lafarge Redland<br>Aggregates Ltd<br>(02.06.99)  | <p>Presumably this can have a double benefit of water storage and flood storage. In 1998 a study was carried out for a scheme in Wakefield, diverting floodwaters to gravel pits upstream of the city. There are many restored gravel pits in the Ouse Valley that could be used in this way and provide water storage for summer use. New gravel workings could be designed with these uses in mind, thus avoiding the costs of separate reservoir development. If commercial organisations are to co-operate in providing such facilities, costs must be offset by sufficient commercial gain.</p> <p>The company would be willing to discuss potential with the Agency, water companies and local authorities. As the only body with an overview of requirements, the Agency should take the lead.</p> | <p>Noted. Abstraction to divert flood waters would still require an abstraction licence.</p> <p>Noted.</p>  |

| CONSULTEE<br>(LETTER DATE)     | COMMENTS   | RESPONSE  |
|--------------------------------|--|---|
| IWA, Head Office<br>(21.06.99) | <p>IWA broadly welcomes the Agency's belief that there should be tight controls on increased levels of abstraction.</p> <p>Pleased to see proposals for water storage during high flows.</p> <p>However, an adequate flow to the tidal river must be maintained at Earith to minimise siltation and maintain bed levels and flows for land drainage, navigation and water resource purposes.</p> <p>It is hoped that the Agency will act against water wastage, eg by irrigating crops in the heat of the day.</p> <p>Thought may be given to time-limited abstraction licences.</p> | <p>There are few places in this LEAP area where additional water would be licensed.</p> <p>Noted.</p> <p>With respect to flows to the Tidal River, all proposals for abstraction of water in the winter are subject to a full technical assessment including the impacts on siltation and the geomorphology of the river.</p> <p>The Agency does encourage efficient irrigation; during drought conditions we restrict both spray irrigation volumes and the hours when it may be carried out.</p> <p>Practically all new licences and variations to existing licences in this area are issued on a time-limited basis.</p> |

**ISSUE 2      ENSURING THAT RIVERS AND WETLANDS ARE NOT ADVERSELY AFFECTED BY ABSTRACTION**

| CONSULTEE<br>(LETTER DATE)                              | COMMENTS  | RESPONSE   |
|---|---|--|
| CPRE - Mid Beds<br>(23.04.99)                           | <p>The Group agrees that river and wetland environments need more protection.</p> <p>Proposal 1 should be prioritised.</p> <p>Proposal 2 should be developed.</p> <p>Proposal 3 should be encouraged.</p>   | <p>Noted. It is likely that all 3 proposals will be pursued.</p>                             |
| English Nature - Beds<br>Cams & Northants<br>(12.05.99) | <p>EN welcomes the actions identified and supports the need to complete production of Water Level Management Plans (WLMPs).</p> <p>Implementation is also important, and EN has formulated an additional Proposal to cover this.</p> <p>Proposal 3: EN continues to support Anglian Water's investigative project.</p>  | <p>Noted.</p> <p>Noted. Implementation of WLMPs will be added to the LEAP.</p> <p>Noted.</p> |
| IWA – Cambridge<br>(15.05.99)                           | <p>'In river needs' need to be studied and agreed. WLMP production is desirable but the IWA is interested in any plans that may affect navigational waters. (See Theme 4)</p>   | <p>Noted.</p>  |
| Anglian Water<br>Services Ltd<br>(25.05.99)             | <p>The aim of the Anglian Water study into the strategic water management of the River Ouse (and Nene) is to provide baseline information for better resource management during exceptional drought conditions without adverse environmental effects. It also includes the importance of effluent discharges in maintaining river flows and wetlands.</p> <p>WRc are contractors for the study, not a 'participating organisation'.</p> | <p>Noted.</p> <p>Noted and taken forward in the LEAP.</p>                                    |

| CONSULTEE<br>(LETTER DATE)                       | COMMENTS   | RESPONSE  |
|--|--|---|
| CPRE – Bedfordshire<br>(27.05.99)                | This is vitally important and 'do nothing' (Proposal 4) must not be chosen. Proposals 1 and 3 should be pursued. (Proposal 2 is outside the Branch area.)  | Noted. All 3 positive proposals will be pursued.  |
| Ivel Valley<br>Countryside Project<br>(28.05.99) | The Project supports the production of an In River Needs study for the Ivel and its tributaries, as a priority.  | Noted.  |
| Cambridgeshire<br>County Council<br>(01.06.99)   | The Council supports and welcomes Proposals 1, 2 and 3.<br><br>The Agency should consider including a proposal that impacts of water abstraction associated with major new development/mineral extraction are fully assessed.<br><br>The 'do nothing' option is opposed as it would not meet EU Habitats Directive requirements. | Noted.<br><br>The de-watering activities associated with mineral workings are exempt from the licensing system under Section 29 of the WRA91. However, under Section 30 of the WRA91, the Agency can serve a Conservation Notice on the developer to ensure protection of local protected rights and the water environment.<br><br>The 'Do Nothing' option does not refer to the Habitats Directive work. |
| RSPB<br>(01.06.99)                               | The RSPB supports Proposals 1, 2 and 3, which would provide greater understanding of water requirements, improved resource management and wetland habitat protection.  | Noted.  |

**ISSUE 3 CONCERN THAT THE OPERATION OF THE RIVERS HIZ AND OUGHTON SUPPORT SCHEME IS NOT FULLY MEETING ITS OBJECTIVES TO ALLEVIATE LOW FLOWS**

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS  | RESPONSE   |
|--|---|--|
| CPRE - Mid Beds<br>(23.04.99)                            | The Group is concerned about continuing low flows in the Rivers Hiz and Oughton; the operation of the Support Scheme should be reviewed as a matter of urgency.   | Noted. The scheme has been monitored for 3 years and a final report, including recommendations, was received in draft form in November 1999. |
| English Nature - Beds<br>Cambs & Northants<br>(12.05.99) | EN welcomes Proposal 1 and supports the need to review the operation of the support scheme.   |  |
| CPRE – Bedfordshire<br>(27.05.99)                        | The Branch is concerned about continued low flows in the Rivers Hiz and Oughton and the Ivel above Henlow. Operation of the Support Scheme and of abstraction in the catchment should be reviewed urgently. |  |
| Ivel Valley<br>Countryside Project<br>(28.05.99)         | The Project supports Proposal 1 and welcomes the opportunity to work in partnership with the Agency and Three Valleys Water to increase the support scheme's environmental benefits.                        | Noted.   |

**3.3 Biodiversity: Maintain and Further Nature Conservation**

| CONSULTEE<br>(LETTER DATE) | COMMENTS   | RESPONSE  |
|----------------------------|--|---|
| W B Carter<br>(20.05.99)   | The fish population has declined over the years. In the early days this may have been due in part to discharges of raw sewage. Now, however, river flows have been reduced, and detergent and other chemicals introduced | The most recent survey of the Bedford Ouse showed the highest fisheries biomass since records began in 1983. There has been little change in the population, with fluctuations due to the fishes' shoaling behaviour. A special investigation into the impact of improved sewage discharge quality indicated that fish food availability remains good and no downward trend in fish stocks was distinguishable in this catchment. |

**ISSUE 4 FAILURE OF THE RIVER BEDFORD OUSE AND ASSOCIATED TRIBUTARIES TO ACHIEVE FISH BIOMASS TARGETS**

| CONSULTEE<br>(LETTER DATE)                              | COMMENTS   | RESPONSE   |
|---|--|--|
| English Nature - Beds<br>Cams & Northants<br>(12.05.99) | An additional Proposal could be included, to survey for scarce species, such as Spined Loach, or to collect data on these species during routine monitoring exercises. | All species caught during a routine survey are recorded. The Agency, as a 'Competent Authority', collates information nationally on captures of Habitat Directive Species, which include Spined Loach. |
| CPRE – Bedfordshire<br>(27.05.99)                       | The Branch supports research and appropriate management of fish stocks.  | Noted.   |

**ISSUE 5 AQUATIC HABITAT NEEDS TO BE RESTORED OR IMPROVED TO BENEFIT FISH STOCKS AND OTHER ASSOCIATED WILDLIFE**

| CONSULTEE<br>(LETTER DATE)                              | COMMENTS   | RESPONSE   |
|---|--|--|
| CPRE - Mid Beds<br>(23.04.99)                           | Proposal 1, to create improved habitats for fish, is supported.<br>Proposal 2, to investigate the reasons for poor fish stocks, is supported.  | Noted.<br>Noted.   |
| English Nature - Beds<br>Cams & Northants<br>(12.05.99) | EN supports habitat improvement within the river system, but questions whether this necessarily incurs extra costs.<br><br>One or more protected species may occur on river stretches where works are proposed. Before any engineering works are carried out, the area should be surveyed for water voles, otters and crayfish. EN should be consulted if protected species are present. | Noted.<br><br>The Agency's Conservation Officer for the area surveys all stretches of river before maintenance engineering works are carried out. EN, along with other organisations, is routinely consulted when the annual maintenance dredging programme is issued. |
| CPRE – Bedfordshire<br>(27.05.99)                       | Work to improve habitat, including for non-fish wildlife, is supported.  | Noted.   |
| Cambridgeshire<br>County Council<br>(01.06.99)          | Off-river refuges should be created for the benefit of all wildlife, including fish, to help improve nature conservation value and achieve BAP habitat and species targets.  | Although not mentioned in the text, this is always a consideration in line with our integrated river basin management philosophy.  |

| CONSULTEE<br>(LETTER DATE) | COMMENTS   | RESPONSE |
|----------------------------|--|----------|
| RSPB<br>(01.06.99)         | The RSPB supports Proposals 1 and 2, which address aquatic habitat requirements for improved fish spawning, nursery and winter areas, and provide habitat for other freshwater fauna and wildlife. | Noted.   |

**ISSUE 6 RIVER AND FLOODPLAIN HABITATS ARE DEGRADED**

| CONSULTEE<br>(LETTER DATE)                              | COMMENTS  | RESPONSE   |
|---|---|--|
| CPRE - Mid Beds<br>(23.04.99)                           | The Agency needs to pursue all three Proposals, particularly Proposal 1.  | Noted.   |
| Bedford Group of<br>Drainage Boards<br>(10.05.99)       | Proposals 1, 2 and 3: Include IDBs in the list of Partners.   | Noted and taken forward in the LEAP.   |
| English Nature - Beds<br>Cams & Northants<br>(12.05.99) | The Proposals are welcome. Under Proposal 2, publicity could provide an opportunity to refute the idea that conservation may compromise flood defence; in many cases the two are mutually beneficial.   | Noted.   |
| GOBA<br>(13.05.99)                                      | Would navigation be impeded by the proposed reed beds at Over and Willingham? If, as suggested, these are adjacent to the river, GOBA cannot foresee a problem.   | The reedbed will be on the landward side of the flood bank; no impact on navigation is foreseen.   |
| CPRE – Bedfordshire<br>(27.05.99)                       | The Branch supports Proposal 2. (Proposal 1 is outside its area.)<br><br>Conservation must be at the forefront of all river and watercourse maintenance operations (Proposal 3).  | Noted.<br><br>After the protection of people and property from flooding, conservation is a primary consideration in all watercourse maintenance operations.  |
| Ivel Valley<br>Countryside Project<br>(28.05.99)        | The Project fully supports Proposal 2 and would like the River Ivel Navigation to be included as well; it is a significant tributary of the Ivel, suffers from a degraded environment, is no longer used/managed as a navigation, and would allow a range of habitat enhancements. As regards the 'flood defence' disadvantage, an assessment of flood defence provision and requirements for the Ivel catchment would be welcome. This is an issue not specifically referred to in the Plan.<br><br>They would like to work with the Agency to identify sites, work-up and implement enhancement schemes, and could help explore external funding opportunities. | The Agency is considering a project to identify constraints and opportunities for habitat enhancement within the LEAP Area. This Project would take account of Flood Defence constraints and requirements.<br><br>Noted. |

| CONSULTEE<br>(LETTER DATE)                      | COMMENTS   | RESPONSE  |
|---|--|---|
| Cambridgeshire<br>County Council<br>(01.06.99)  | <p>The Council supports Proposals 1, 2 and 3 and welcomes the <i>potential</i> creation of large reed-beds at Needingworth Quarry; these would meet almost half of the national and nearly all of the local biodiversity targets for this habitat.</p> <p>Amey Roadstone Company, Central is now known as Hanson Aggregates.</p> <p>The Council looks forward to continued close working with the Agency to restore degraded habitats as this helps achieve its own Environment 2000 objectives.</p>   | <p>Noted.</p> <p>Noted and taken forward in the LEAP.</p> <p>The Cambridgeshire BAP process is the most appropriate forum for this liaison.</p>   |
| RSPB<br>(01.06.99)                              | <p>Proposal 1: The RSPB fully supports the creation of a large-scale reed-bed at Needingworth and Over. Cost implications for the Agency are limited, with capital costs being largely borne by the proposers, Hanson Aggregates (previously Amey Roadstone Company). Water requirements are fully assessed in the draft Environmental Statement; the Agency has a copy of this.</p> <p>Proposal 2: The RSPB supports the proposal for floodplain restoration sites to be identified in consultation with other organisations.</p> <p>Proposal 3: The RSPB supports environment enhancement in river maintenance and capital operations.</p> | <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>   |
| Lafarge Redland<br>Aggregates Ltd<br>(02.06.99) | <p>Proposal 1: This proposal illustrates what has and can be achieved. Lafarge Redland's Godmanchester site is an excellent example of a regionally significant biodiversity site where wetland and floodplain habitats of exceptional quality have been established.</p> <p>A vision to extend these ideas to other sites is needed. The company would welcome more specific guidance on the location for further habitat creation schemes in the area or a more detailed indication of the extent of different habitats needed.</p>  | <p>Noted.</p> <p>In the future, Local Biodiversity Action Plans (LBAPs) should help to identify primary habitats for restoration or creation.</p> |

**ISSUE 7 HOUGHTON STRUCTURES REQUIRE REFURBISHING TO MAINTAIN RIVER LEVELS IN LINE WITH WLMP RECOMMENDATIONS**

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS   | RESPONSE |
|--|--|----------|
| CPRE - Mid Beds<br>(23.04.99)                            | The Group supports Proposal 1.   | Noted.   |
| English Nature - Beds<br>Cambs & Northants<br>(12.05.99) | EN supports the implementation of agreed WLMP to sustain the special interest of SSSI. | Noted.   |

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS   | RESPONSE  |
|--|--|---|
| GOBA<br>(13.05.99)                                       | GOBA would not wish to see navigation or river levels impeded.   | Noted.  |
| IWA - Cambridge<br>(15.05.99)                            | Houghton Meadows: Refurbishment of the weirs, and the area in general, is approved.<br><br>The disadvantages relating to Proposal 1 are not fully understood.  | Noted.<br><br>These were incorrectly stated. Refurbishment of the weirs will not cause a loss in retention level.   |
| W B Carter<br>(20.05.99)                                 | Why would refurbishing the weirs cause a loss of retention level? Perhaps this is a misprint.<br><br>There are weirs and sluice gates throughout the river system. The present statutory levels should not be changed.   | This is an error; refurbishment will not cause a loss in retention level.<br><br>There is no intention to change existing levels.   |
| The East Anglian Waterways Association Ltd<br>(27.05.99) | The Association is concerned that work is needed to refurbish four weirs as the failure of any of them could be disastrous for navigation, fishing and general amenity. Work should be prioritised to safeguard the structures.  | This is of high priority. The works at all four weirs will be substantially completed during the 1999/2000 financial year.  |
| Cambridgeshire County Council<br>(01.06.99)              | Proposals that would be to the detriment of Houghton Meadows SSSI are strongly opposed; the site contains locally rare and nationally declining plant communities. Such actions would conflict with the BAP for mesotrophic grasslands.<br><br>The Agency must find a solution that prevents or reduces adverse environmental effects yet enables refurbishment of weirs to maintain river levels. | Refurbishment of the weirs will ensure that river levels can be maintained in accordance with the Water Level Management Plan recommendations.<br><br>This is the solution proposed. Conservation is a primary consideration in all our watercourse maintenance operations. |
| RSPB<br>(01.06.99)                                       | Proposal 1: The RSPB supports the refurbishment of weirs which would maintain important river corridor habitats.<br><br>Proposal 2: The RSPB objects to the 'do nothing' option which could lead to collapse of the weir. Could this impact on Houghton Meadows SSSI?  | Noted.<br><br>Noted. The proposal to refurbish the weirs is being taken forward in the LEAP as their collapse could impact on the SSSI.   |
| IWA, Head Office<br>(21.06.99)                           | In view of the 'do nothing' consequences, IWA urges the Agency to place some priority on the works in Proposal 1, to ensure that they are carried out well in advance of any danger of structural failure.<br><br>The disadvantages of Proposal 1 are wrongly stated.  | The works are scheduled for the 1999/2000 financial year. Some emergency works have already been carried out.<br><br>Agreed. There are no disadvantages other than resource needs and costs.  |

## 3.4 Enjoyment of the Waterways

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS  | RESPONSE   |
|--|---|--|
| Cambridgeshire<br>County Council<br>(01.06.99) | <p>This section is weak. There is great potential for the Agency to help increase the area's recreational potential.</p> <p>Issues 8 and 9 focus on providing canoe-related facilities and fail to address opportunities for increasing walking, cycling or horse riding.</p> <p>Options should include planning for increased demand for all recreational activities, and encouragement of alternative modes of transport to the car for accessing river-based facilities.</p> <p>There is no mention of opportunities that exist in connection with proposals at Needingworth Quarry.</p> | <p>The Agency has clear duties when managing the river for boaters and anglers, but we have no statutory powers relating to other recreational activities. Nevertheless, we constantly seek appropriate recreation projects, associated with inland waters, to become involved with and promote. These projects tend to be initiated and led by local authorities or landowners.</p> <p>Noted and taken forward in the LEAP.</p> <p>Agency sites are often remote and our land holdings in the LEAP area are minimal. We would welcome ideas as to how this transport issue could be resolved; we have an interest but no powers in transport planning.</p> <p>Noted and taken forward in the LEAP. The Needingworth restoration proposals are mentioned under Issue 6 and Chapter 4, Theme 9: Enhancing Biodiversity.</p> |

**ISSUE 8      THERE IS A LACK OF PUBLIC ACCESS TO THE RIVER GREAT OUSE FOR RECREATIONAL ACTIVITIES**

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS   | RESPONSE   |
|--|--|--|
| CPRE - Mid Beds<br>(23.04.99)                            | Proposal 1 and Proposal 2 are supported.   | Noted.   |
| English Nature - Beds<br>Cambs & Northants<br>(12.05.99) | EN recommends amendment of the text to include 'The Agency will ensure that recreational initiatives in which it is involved do not adversely affect features of wildlife importance'. | The Agency agrees with this statement but this text will not be carried forward into the LEAP and cannot be amended. |
| GOBA<br>(13.05.99)                                       | GOBA would like to stress the importance of providing slipways. Perhaps this could be done in partnership with local Councils.   | All slipways in the lower Ouse are council-owned.  |
| IWA - Cambridge<br>(15.05.99)                            | The provision of suitable slipway facilities and general access for the public is to be encouraged.  | Noted. (This would come under the local council's remit.)  |

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS   | RESPONSE  |
|--|--|---|
| W B Carter<br>(20.05.99)                                 | <p>Public slipways are not a good idea. They allow speedboats to be launched for water-skiers, give easy access for boat theft, and can be used for unregistered craft. If visitors used launching facilities at boaryards, they could be informed of speed limits and boat manners.</p> <p>Small slipways, with width limitations, could be established for dinghies and canoes.</p> <p>A simple day licence could be issued.</p>   | <p>Slipways are sign-posted to remind users of speed limits and the need to be registered. We are in the process of replacing these signs; the replacements will include 'No Jet Skies or Water Skiing'. The Agency has been instrumental in launching 'Boat Watch' to reduce theft of/from boats.</p> <p>Noted.</p> <p>There is no facility for this at present.</p> |
| British Canoe Union<br>(27.05.99)                        | <p>It is important to provide launching sites. These can be inexpensive; only at popular sites will landing stage construction be needed to limit wear and tear to banks.</p> <p>Adequate parking facilities are required for cars/minibuses and trailers.</p> <p>Portage routes with suitable landing and launching points are needed at locks, weirs and uncanoeable river stretches.</p> <p>BCU welcomes the ongoing work on this topic and can offer technical assistance with design of facilities. It is particularly keen to be involved when work is to be carried out on weirs. The safe exit route provided in case of capsizing, also offers the best chance of survival should any member of the public fall into the water above or below the weir.</p> | <p>We are aware of this need and are in consultation with the BCU Access Officer and local landowners.</p> <p>We have limited land holdings in this area and therefore can only influence other landowners.</p> <p>The Agency has provided canoe portages at certain locks during 1998, including St Ives, Godmanchester and Cardington.</p> <p>Noted.</p>            |
| The East Anglian Waterways Association Ltd<br>(27.05.99) | <p>The provision of canoe portage facilities is welcomed, as is the provision of more slipway facilities.</p> <p>The Association would also like to see more footpaths opened up, and hopes that the Agency will act as co-ordinator with the landowners and local authorities concerned.</p>  | <p>Noted.</p> <p>Noted and taken forward, as far as practicable, in the LEAP. We have no statutory powers relating to access or recreational activities other than navigation and angling, but we constantly seek appropriate projects to become involved with and promote. We do monitor and improve usage of our own land holdings.</p>                             |
| CPRE – Bedfordshire<br>(27.05.99)                        | <p>CPRE supports better access to the river, especially for canoes and other non-motored craft.</p> <p>However, it is disappointing that pedestrian access is not mentioned. In conjunction with the County Council and others, the Agency could use advocacy to increase riverside paths and close gaps in the public path network.</p>   | <p>Noted.</p> <p>Noted and taken forward in the LEAP.</p>   |

| CONSULTEE<br>(LETTER DATE)   | COMMENTS   | RESPONSE  |
|--|--|---|
| Ivel Valley<br>Countryside Project<br>(28.05.99)                       | <p>The River Ivel and its tributaries are used by canoeists, especially beginners. A proposal to liaise with British Canoe Union about providing portage facilities on these watercourses would be welcome.</p> <p>Promoted riverside paths and open access areas are not shown as an issue in the Plan. The Project is seeking to extend the Ouse Valley Way and would welcome the consideration of increased informal recreation provision on the Great Ouse as a Plan proposal.</p>   | <p>The Agency is not the Navigation Authority for this stretch of river and at present it is unclear who, if anyone, is. At present our higher priority is to provide access around locks that do not have portages.</p> <p>Noted and taken forward in the LEAP.</p>  |
| Huntingdon Canoe<br>Club & Cambs<br>Canoeing Association<br>(03.06.99) | <p>The clubs appreciate Agency support for access on backwaters and improvements to canoe portages at various locks on the Great Ouse.</p> <p>Portage is difficult at Eaton Socon lock, particularly upstream and in close proximity to large powered craft. Canoe portages could be positioned safely upstream and downstream of the weir, on the right bank (as viewed looking downstream).</p> <p>Excessive reed growth at Great Staughton on the River Kym is also hampering river access. Could this be cleared at the beginning of the season?</p> | <p>Noted.</p> <p>Noted, but Eaton Socon already has a downstream portage on the left bank. We routinely consult with organisations such as the British Canoe Union, to identify and prioritise locations for such facilities.</p> <p>We are not the Navigation Authority for this watercourse, and current grass and weed cutting practices are driven by flood defence needs. We must also take into account the need to maintain cover for spawning fish and fry.</p> |
| IWA, Head Office<br>(21.06.99)   | IWA is pleased to see the Agency's commitment to recreational facility enhancements, welcomes Proposals 1 and 2, and encourages the Agency to enhance access opportunities for walkers, anglers and other users of the river corridor as well. This may require co-operation with landowners and local authorities, but the Agency is ideally placed to act as lead partner.   | Noted and taken forward, as far as practicable, in the LEAP. However, whilst we actively seek appropriate projects to become involved with and promote, our statutory powers are limited to navigation and angling. The majority of such projects are initiated and led by local authorities or landowners.   |

#### ISSUE 9 THE IMPACT OF CARDINGTON CANOE SLALOM CHANNEL ON THE ECOLOGY OF SURROUNDING WATERCOURSES

| CONSULTEE<br>(LETTER DATE) | COMMENTS  | RESPONSE   |
|----------------------------|---|--|
| GOBA<br>(13.05.99)         | GOBA supports the use of an alarm system (Proposal 2), but wishes to be consulted about river level settings when the Slalom is in use. | Noted. The high flow alarm is for canoeists, and the low level alarm is an environmental precaution. (If the water level drops below a pre-set threshold, the alarm will sound and the gate is closed.) Navigation should not be affected. |

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS  | RESPONSE  |
|--|---|---|
| IWA - Cambridge<br>(15.05.99)                            | <p>Some IWA members have suggested that although flows may differ in various sections, this does not cause navigation problems.</p> <p>Flow has been observed to pass through the slalom for a long time when no canoeist is on the water. This and Proposal 4 could be discussed with Slalom users.</p>  | <p>Noted.</p> <p>All canoeists are issued with detailed instructions to avoid this situation. Although prolonged use may have some effect, it is mitigated by the alarm system.</p>   |
| Sport England<br>(21.05.99)                              | <p>The Canoe Slalom has in most perceptions been a great success. Whilst its operation may have an effect on water levels in adjacent streams, this is not substantiated in the report.</p> <p>Sport England is pleased that possible solutions concentrate on management issues, and urge further consideration of proposals outlined.</p> <p>Sport England would be concerned about any threat to the future operation of the Slalom.</p>   | <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>   |
| British Canoe Union<br>(27.05.99)                        | BCU is anxious that use of this important facility is not curtailed without sufficient scientific evidence to justify it. Appropriate action should be agreed in partnership between the Agency and the Cardington Artificial Slalom Course Committee.  | Noted.  |
| The East Anglian Waterways Association Ltd<br>(27.05.99) | The Association fully supports the Agency's proposals to control the slalom as the lack of flow and poor condition of the New Cut has been of concern for some time.  | Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)                        | The Branch is concerned about lowered water levels in the New Cut and adjacent watercourses, and surprised that this was not foreseen. An alarm on its own is insufficient; procedures are needed to restrict water diversion when necessary, to ensure levels do not drop below an acceptable threshold  | The alarm ensures that operators are actively made aware when river levels fall below the pre-set threshold. Since its installation, no significant drawdowns, akin to the isolated events previously seen, have occurred. We will continue to monitor the situation with the Cardington Slalom Committee.  |
| Priory Country Park<br>(28.05.99)                        | <p>Both Canoe Slalom usage and the River Festival cause serious level drops in the New Cut and the stream fed by Cardington Spillway.</p> <p>Proposals 1, 2 and 4 should be combined, but none is really acceptable. Water needs to be directed over the crescent weir from the embankment spillover, either by lowering the weir sill or using a system of boards/slucice gates when there is a canoe event to prevent loss of water through the Gudgeons Mill link to the Great Ouse. Water should flow continually over Cardington Spillway. Low levels prevent this and cause problems with rush encroachment blocking the stream, which requires dredging.</p> | <p>The alarm now prevents problems with the Canoe Slalom. The river level is intentionally dropped in consultation with Priory Country Park for the River Festival; this is a Bedfordshire County Council initiative.</p> <p>The alarm now warns when the water levels are low. The Agency provides guidelines to the Canoe Slalom Committee for the operation of the course and it is their responsibility to enforce them.</p> <p>We believe that existing arrangements are satisfactory and further measures are not feasible.</p> |
| RSPB<br>(01.06.99)                                       | Proposal 2: The RSPB supports the alarm to warn of low water levels and thus avoid drying out watercourses near the Canoe Slalom.   | Noted.  |

| CONSULTEE<br>(LETTER DATE)     | COMMENTS   | RESPONSE |
|--------------------------------|--|----------|
| IWA, Head Office<br>(21.06.99) | IWA welcomes Proposals 1 to 4. All users need to be involved and educated in their implementation from the outset. | Noted.   |

### 3.5 Disposal and Management of Waste Material

#### ISSUE 10 PUBLIC CONCERN OVER BRICK MAKING AND WASTE DISPOSAL SITES IN THE MARSTON VALE

| CONSULTEE<br>(LETTER DATE)                      | COMMENTS   | RESPONSE  |
|---|--|---|
| CPRE – Mid Beds<br>(23.04.99)                   | This issue is particularly important given the adverse impact on quality of life in the Marston Vale. Proposal 1 is strongly supported and the Agency is urged to prioritise this Issue.   | Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)               | It is surprising that this Issue has not been given a higher profile and that more options for mitigation have not been identified. Landfill emissions can be extremely uncomfortable for nearby residents. Odorous emissions from brickwork stacks spread over a wide area, exacerbate problems for those with breathing difficulties, and are offensive. It is time to commence an action programme on landfill and works emissions, not to defer it pending yet more surveys. | The LEAP addresses matters that are not subject to direct regulatory powers or duties of the Agency. The brick making process is regulated under Integrated Pollution Control. Considerable effort has been and is continuing to be made to identify and implement improvements to the brickworks to further minimise the releases to the environment as part of the IPC statutory process. The waste management sites are controlled through waste management licences. This issue aims to find correlation between, for example, the effect of weather (wind direction and temperature) and the operation of the sites that combine to produce public concern and complaints. Through a greater understanding of these factors, additional specific, mitigating control measures can be introduced into the operating conditions of the site. |
| Mid Bedfordshire District Council<br>(02.06.99) | The Proposal should address the problems in the Marston Vale, rather than just 'survey the factors'. It gives little comfort to residents of Cranfield, Brogborough, etc.<br><br>Arlesey landfill site is a key issue locally, but has been overlooked in the LEAP.  | Please see the above response to CPRE.<br><br>Historically, Arlesey landfill has not been subject to the same level of complaint as those in the Marston Vale. This has increased more recently as the local population has become aware of the presence of the site, even though the operations have not changed over the years. The findings of the Marston Vale survey will have relevance to the site at Arlesey.   |

## ISSUE 11 THE SCALE OF MISUSE OF EXEMPT WASTE MANAGEMENT SITES IS UNKNOWN

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS  | RESPONSE  |
|--|---|---|
| CPRE - Mid Beds<br>(23.04.99)                            | The Group strongly supports Proposal 1.   | Noted.  |
| English Nature - Beds<br>Cambs & Northants<br>(12.05.99) | EN supports the proposed action.  | Noted.  |
| CPRE - Bedfordshire<br>(27.05.99)                        | Proposal 1 is supported.  | Noted.  |
| Cambridgeshire<br>County Council<br>(01.06.99)           | The Council supports Proposal 1. Exempt sites should be regularly monitored and enforcement action taken when required.<br><br>Opportunities to promote waste minimisation should also be sought.<br><br>'Do nothing' should not be considered an option. | Unlike licensed waste management sites that are inspected regularly, exempt sites are supposed to present low risk and the Agency has no duty or funding to inspect them regularly. The survey will provide an opportunity to measure the extent to which the environment is at risk from these sites within the LEAP area. The Agency will consider enforcement action where the circumstances justify such a course of action.<br><br>Waste minimisation is promoted during our routine visits to industry, as part of our normal duties.<br><br>Noted. |
| Mid Bedfordshire<br>District Council<br>(02.06.99)       | Whilst a survey of exempt activities is welcomed, it is disappointing that the Agency does not propose positive action against those who misuse the sites.  | The Agency will consider enforcement action where the circumstances justify such a course of action.  |

## ISSUE 12 THERE IS A LACK OF INFORMATION ON THE LAND SPREADING OF WASTES

| CONSULTEE<br>(LETTER DATE)                               | COMMENTS  | RESPONSE  |
|--|---|---|
| CPRE - Mid Beds<br>(23.04.99)                            | The Group is pleased to support Proposal 1. It is our understanding that Anglian Water is in the habit of spreading untreated sewage sludge on farm land. We would particularly ask that this be investigated and the health hazard assessed. | The spreading of untreated waste has not been permitted since December 1998, through an agreement with MAFF, AWS, Water UK and the British Retail Consortium. |
| English Nature - Beds<br>Cambs & Northants<br>(12.05.99) | EN welcomes the proposal to investigate the extent of land spreading of wastes.   | Noted.  |

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS  | RESPONSE  |
|--|---|---|
| Anglian Water<br>Services Ltd<br>(25.05.99)    | <p>The first line should state that some waste is suitable for spreading on land.</p> <p>The last sentence requires clarification. It reads as though Anglian Water may be implicated, but details of biosolids applied to agriculture are held by Anglian Water on a field-by-field basis. The Agency has a statutory right to inspect the register, so data is available to establish levels of compliance with regulations under which Anglian Water works. Anglian Water does not have a duty to report locations of spreading sites to the Agency.</p>   | <p>Noted but this text will not appear in the LEAP.</p> <p>Noted but this text will not appear in the LEAP. The last 2 sentences refer to 'the use of other wastes' as the spreading of sludge is covered in the first 3 sentences. We will take the comments forward in future consultation documents and separate out the paragraphs in an effort to clarify the situation.</p> |
| CPRE – Bedfordshire<br>(27.05.99)              | <p>Proposal 1 is supported.</p> <p>Health hazards caused by land spreading of untreated sewage sludge are of concern, but such material can be of benefit to the soil. Its injection under the surface should be encouraged where pollution by runoff and drainage would not be increased.</p> <p>Nitrate Vulnerable Zones (NVZs) and sensitive habitats should be protected.</p>   | <p>Noted.</p> <p>The spreading of untreated waste has not been permitted since December 1998, through an agreement with MAFF, AWS, Water UK and the British Retail Consortium.</p> <p>Noted.</p>  |
| Cambridgeshire<br>County Council<br>(01.06.99) | <p>Problems are likely to intensify and to 'do nothing' is unacceptable.</p> <p>The Ely Ouse LEAP took this Issue further by addressing the fact that regulation needs to be improved. A combined approach could incorporate a survey to establish the problem's extent, monitoring, and enforcement.</p> <p>As Waste Planning Authority (WPA), the Council is concerned about land raising being exploited to avoid Licensing Regulations and Landfill Tax. Closer scrutiny of such schemes is required. Clear prior consultation arrangements should be initiated with the WPA as planning consent may be required.</p> | <p>Noted. Action is required.</p> <p>The Agency will consider enforcement action where the circumstances justify such a course of action.</p> <p>Issue 11 covers the use of Waste Management Exemptions for the purpose of land raising. The Agency would welcome arrangements to help combat the inappropriate use of these exemptions.</p>                                      |

### 3.6 Risks to Water Quality

#### ISSUE 13 EUTROPHICATION OF RIVERS GREAT OUSE, IVEL, HIZ AND GRAFHAM WATER

| CONSULTEE<br>(LETTER DATE)    | COMMENTS  | RESPONSE  |
|-------------------------------|---|---|
| CPRE - Mid Beds<br>(23.04.99) | This is one of the most important Issues. Proposals 1 and 2 should be implemented as a matter of urgency. | The implementation is set by the AMP3 timetable agreed by Government. |

| CONSULTEE<br>(LETTER DATE)                                     | COMMENTS   | RESPONSE   |
|--|--|--|
| English Nature - Beds<br>Cambs & Northants<br>(12.05.99)       | English Nature supports Proposals 1 and 2, but the actions seem to focus on the phosphate problem. Investigations under Proposal 2 should tackle both phosphates and nitrates.   | Noted and taken forward in the LEAP (Issue 13 Comments column). Under the National Eutrophication Strategy, which is being consulted on at the moment, phosphate and nitrate pollution from diffuse and point sources will be covered.   |
| Anglian Water<br>Services Ltd<br>(25.05.99)                    | <p>A further disadvantage of Proposal 1 is that eutrophication will still be present due to diffuse inputs from farmland.</p> <p>Anglian Water modelling shows that background sources may have a greater impact than all sewage treatment works (STWs). Although phosphorus stripping will reduce levels, they are still predicted to remain above the eutrophication threshold. There should be acknowledgement that STWs are not the major source of nutrient into rivers in this region, the majority coming from farming and agriculture, and unless all causes are tackled the problem can only be reduced, not solved.</p> <p>There should be some mention of the Agency's new policy on eutrophication, which includes diffuse nutrient inputs.</p> <p>It would be clearer to give the town name as well as the 'local' name of the STW in the table, eg Poppy Hill which serves Arlesey, Langford and Stotfold.</p> | <p>Under the National Eutrophication Strategy, which is being consulted on at the moment, phosphate and nitrate pollution from diffuse and point sources will be covered.</p> <p>Noted and taken forward in the LEAP.</p> <p>The decision was made for the LEAP to use STW names to simplify the list.</p> |
| The East Anglian<br>Waterways<br>Association Ltd<br>(27.05.99) | The Association urges the Agency to increase pressure on Anglian Water to install phosphorus-stripping equipment at the 11 treatment works specified as soon as possible.  | The implementation is set by the AMP3 timetable agreed by Government.  |
| CPRE – Bedfordshire<br>(27.05.99)                              | <p>Eutrophication is important and should be tackled as high priority. Algal growth and low oxygen/low flows are unpleasant and put wildlife at risk.</p> <p>Proposals 1 and 2 are strongly supported. Proposal 3 cannot be chosen.</p>  | <p>Under the National Eutrophication Strategy, which is being consulted on at the moment, phosphate and nitrate pollution from diffuse and point sources will be covered.</p> <p>Noted.</p>  |
| Ivel Valley<br>Countryside Project<br>(28.05.99)               | <p>The Project would welcome the use of natural systems, such as reedbed filters, at the relevant Ivel valley STWs to remove nutrients. These would provide a sustainable management tool and offer habitat benefits.</p> <p>Consideration should be given to addressing agricultural runoff as an issue. The Project would support the promotion of buffer strips on all riparian land to protect the water environment against such runoff and spray drift and enhance the riparian wildlife corridor.</p>   | Under the National Eutrophication Strategy, which is being consulted on at the moment, phosphate and nitrate pollution from diffuse and point sources will be covered.   |
| Cambridgeshire<br>County Council<br>(01.06.99)                 | The Council supports Proposals 1 and 2. The Agency should also consider running a campaign to promote public awareness.  | Noted.   |
| RSPB<br>(01.06.99)   | The RSPB supports Proposals 1 and 2.   | Noted.   |

| CONSULTEE<br>(LETTER DATE)                      | COMMENTS  | RESPONSE   |
|---|---|--|
| Mid Bedfordshire District Council<br>(02.06.99) | Further ways to reduce eutrophication should consider controlling the source of the problem rather than treating the symptoms, eg controlled use of fertilisers and two stroke engines. | Under the National Eutrophication Strategy, which is being consulted on at the moment, phosphate and nitrate pollution from diffuse and point sources will be covered. |
| IWA, Head Office<br>(21.06.99)                  | As a body associated with the promotion of recreational use of water, IWA supports measures that will improve water quality.  | Noted.   |

#### ISSUE 14 A NUMBER OF RIVER STRETCHES FAIL TO MEET THEIR RIVER ECOSYSTEM TARGETS

| CONSULTEE<br>(LETTER DATE)                            | COMMENTS   | RESPONSE   |
|---|--|--|
| CPRE - Mid Beds<br>(23.04.99)                         | Proposal 1 is supported.   | Noted.   |
| English Nature - Beds Cambs & Northants<br>(12.05.99) | English Nature supports the proposed action.   | Noted.   |
| Anglian Water Services Ltd<br>(25.05.99)              | The first paragraph regarding the AMP 3 process does not seem relevant; it may fit better into Section 4.  | This text will not go forward in the LEAP. The comments will be noted for future LEAPs.                              |
| Cambridgeshire County Council<br>(01.06.99)           | The Council is pleased to see this Issue being addressed and wishes to be advised of areas that fail to meet water quality targets and improvements that will be required. | The water quality results are all available on the public register and can be viewed at our offices in Peterborough. |
| RSPB<br>(01.06.99)                                    | The RSPB supports Proposal 1 to continue monitoring to identify the processes and priorities to improve water quality.   | Noted.   |

#### ISSUE 15 CONTAMINATION OF POTABLE WATER SUPPLY BY NITRATES

| CONSULTEE<br>(LETTER DATE)               | COMMENTS   | RESPONSE  |
|--|--|---|
| CPRE - Mid Beds<br>(23.04.99)            | This Issue is of priority. Proposals 1, 2, 3 and 4 should be pursued vigorously; Proposal 5 is not acceptable as it is a short-term, unsustainable and expensive solution.   | The Agency has an input to Proposals 1-3, but 4 and 5 are Three Valleys Water Company's responsibility.   |
| Anglian Water Services Ltd<br>(25.05.99) | The three NVZs quoted are all around Three Valleys Water's chalk borehole sources, not Anglian Water's.<br><br>Anglian Water abstracts water from borehole sources in the Greensand (Woburn Sands). One site, Birchmoor, was designated a Nitrate Sensitive Area (NSA). The report could clarify its current status.<br><br>There is also the important issue of the risk of agricultural nitrate contamination of Grafham and progress on buffer zone and/or NSA designations to protect surface water sources. | Noted and taken forward in the LEAP.<br><br>Birchmoor is in the Upper Ouse LEAP area and is therefore not included in this report. It is located in the Rivers Leam, Cherwell and Great Ouse NVZ.<br><br>Under the National Eutrophication Strategy, which is being consulted on at the moment, phosphate and nitrate pollution from diffuse and point sources will be covered. |

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS  | RESPONSE  |
|--|---|---|
| CPRE – Bedfordshire<br>(27.05.99)              | This is a priority.<br>Proposals 1 to 4 are supported.<br>Proposal 5 should not be pursued; it is an expensive, short-term, unsustainable solution.   | The implementation is set by the AMP3 timetable agreed by Government.   |
| Cambridgeshire<br>County Council<br>(01.06.99) | Although Cambridgeshire has no NVZs in this LEAP area, the Council welcomes actions to reduce nitrate pollution risks.  | Noted.  |
| RSPB<br>(01.06.99)                             | The RSPB supports Proposals 1 to 4, to monitor and protect water supplies against pollution, and suggests that the advantages should include the benefits to wildlife.<br><br>Proposal 5 fails to address the underlying cause of nitrate pollution and is not a sustainable solution.<br><br>To follow Proposal 6 (do nothing) would be in direct conflict with the Agency's aims as 'Guardians of the Environment'. | Noted, but the advantages column will not be taken forward in the LEAP.<br><br>This will be the Water Company's decision.<br><br>Noted. |
| Three Valleys Water<br>Company<br>(03.08.99)   | Three Valleys Water Co is the lead partner for Proposals 4 and 5, not Anglian Water Services.   | Noted and taken forward in the LEAP.  |

## ISSUE 16 IDENTIFICATION AND REMEDIATION OF CONTAMINATED LAND

| CONSULTEE<br>(LETTER DATE)   | COMMENTS  | RESPONSE   |
|--|---|--|
| CPRE - Mid Beds<br>(23.04.99)  | Proposals 1, 2, 3, 4 and 5 are supported. All are necessary to deal with this problem.  | Noted.   |
| Anglian Water<br>Services Ltd<br>(25.05.99)                            | Anglian Water's Pulloxhill source is currently closed due to concerns about the presence of an unidentified organic compound. The site is close to Flitwick; confirmation is needed that the aquifer is not contaminated by nearby waste disposal activities. | Noted. We are carrying out investigations into the impact of Flitwick landfill site in partnership with Mid Beds District Council.                 |
| CPRE – Bedfordshire<br>(27.05.99)                                      | Proposals 1 to 5 are all necessary if progress is to be made.   | Noted.   |
| Cambridgeshire<br>County Council<br>(01.06.99)                         | 'Do nothing' is not an appropriate option, given the wider risk of contaminants migrating through the aquifer.<br><br>Proposal 3 is supported; it appears an essential action.  | Noted.<br><br>Noted.   |
| Huntingdon Canoe<br>Club & Cambs<br>Canoeing Association<br>(03.06.99) | Is there any evidence of 'waste' leaching into watercourses from landfill sites?<br>More information could be made available to river users and local residents alike.  | We are not aware of any significant leaching into watercourses in the LEAP area, but will fully investigate any incidents that are reported to us. |

## 3.7 Maintaining Rivers for Use

## ISSUE 17 THERE IS TRAFFIC CONGESTION AT LOCKS DURING THE SUMMER PERIOD

| CONSULTEE<br>(LETTER DATE)                                       | COMMENTS   | RESPONSE   |
|--|--|--|
| Ouse Valley River Club<br>(08.04.99)                             | The poor standard of maintenance of locks exacerbates congestion, causing delays and frustration.  | The locks are serviced twice a year (mechanically and electrically) and we respond to reported faults within the times set by the Customer Charter. We feel congestion is due to the small size of the locks and not poor maintenance.   |
| GOBA<br>(13.05.99)   | It is very important that St Neots and Offord Locks are lengthened as soon as possible. GOBA wishes to be consulted at all stages of planning and development of these projects.   | Noted.   |
| IWA - Cambridge<br>(15.05.99)                                    | Lengthening and refurbishment of locks is welcome. IWA hopes that the work is done to a satisfactory size and requirements.  | Noted.   |
| Sport England<br>(21.05.99)                                      | Proposals 1 and 2 are in accordance with the 'Regional Water Recreation Strategy, Zone 1' report, prepared by the former Eastern Council for Sport & Recreation and adopted by Sport England. This report also recommends that the Agency carries out surveys to determine priorities for navigation improvements along this section of the Bedford Ouse.  | Noted  |
| Anglian Water Services Ltd<br>(25.05.99)                         | Anglian Water has voluntarily temporarily restricted abstraction at Offord, at the Agency's request, due to the associated problem of boats grounding on shoals in the Offord reach. Anglian Water is concerned that the problem should not be aggravated by, for example, using additional water for lockage. They have asked the Agency to remove the shoals before summer this year.                      | Noted. There are two problems here. Firstly, the bottom of the lock is known to be too high; this will be addressed when resources allow and it is envisaged that this will be within the timescale of the plan. Secondly, the 'shoal' is foundation work 'concrete' of an old staunch and will require a full feasibility study if it is to be removed. |
| The East Anglian Waterways Association Ltd<br>(27.05.99)         | The Association fully supports the Agency's plans to enlarge the locks at St Neots and Offord.   | Noted.   |
| Cambridgeshire County Council<br>(01.06.99)                      | The Council is delighted that the Agency acknowledges the problems of traffic congestion in popular areas. In their consideration of easing congestion for river users the Agency are urged to also take into account increased impacts of road traffic in these areas. Visitor management objectives and strategies should include measures to encourage alternative modes of transport to the private car. | This issue is concerned with boat traffic; we have an interest but no powers in the control of vehicle emissions and transport planning. However, we would welcome ideas as to how this transport issue could be resolved.   |
| Huntingdon Canoe Club & Cambs Canoeing Association<br>(03.06.99) | It should be remembered that increasing water traffic by widening locks can have a negative effect on the environment by increasing wildlife disturbance and pollution.  | It is our view that widening locks does not increase water traffic, it just allows more boats to go through at once. If a lock was being deepened there might be an increase in water traffic and then the impact on the environment would have to be considered.  |

| CONSULTEE<br>(LETTER DATE)      | COMMENTS  | RESPONSE  |
|---------------------------------|---|---|
| IWA, Head Office<br>(211.06.99) | <p>IWA welcomes the proposals to lengthen St Neots and Offord locks.</p> <p>Though the costs are significant, compared with investment in other Agency functions the amount spent by the navigation function is negligible. The level of lock usage and improved conditions for boaters will show a high return on investment.</p> <p>Please confirm that any changes to locks on the Great Ouse should be to the minimum standards agreed by the Agency's National Navigation and Recreation Manager with the National Navigation Users Forum.</p> | <p>Noted.</p> <p>The Agency does not see a return on its investment on locks. However, it is recognised that the local community may benefit through increased tourism and leisure opportunities.</p> <p>We are able to confirm this.</p> |

**ISSUE 18      THERE IS A PROBLEM WITH VANDALISM OF AGENCY LOCK STRUCTURES**

| CONSULTEE<br>(LETTER DATE)           | COMMENTS  | RESPONSE  |
|--------------------------------------|---|---|
| Ouse Valley River Club<br>(08.04.99) | Vandalism is an issue closely allied with Issue 17 and must be addressed, to maintain the pleasure and safety of boating.   | Boaters generally are not going to vandalise structures they rely on to pursue their hobby, though congestion can lead to frustration.  |
| GOBA<br>(13.05.99)                   | <p>GOBA fully supports efforts to combat vandalism and trespassing.</p> <p>It requests that Willington and Godmanchester Locks are automated and that security boxes are placed on all automation units.</p> <p>Savings could be made by leaving Bedford Lock to be worked manually.</p>  | <p>Noted.</p> <p>Willington Lock has two sets of V doors; it therefore does not require automation and cannot have security boxes. Godmanchester Lock cannot be automated as a power supply is not available.</p> <p>Noted.</p>   |
| IWA - Cambridge<br>(15.05.99)        | Any work done to minimise the effects of vandalism is to be approved.   | Noted.  |
| W B Carter<br>(20.05.99)             | <p>Two enforcement officers in uniform should be on duty at weekends between Bedford and Earith, with mobile phones, to deal with reports of vandalism etc.</p> <p>The County Council should be urged to pass byelaws prohibiting jumping from bridges that are not Agency property,</p> <p>It is especially important that officers wear uniforms.</p> | <p>For the last two summers, weekend patrols were operated as and when resources allowed. For the first part of the summer it was for navigation enforcement. During the summer holidays we had vehicle-based patrols at known trouble spots to combat vandalism. We also liaised with local police and established Operation Foster to combat this vandalism.</p> <p>Noted. (We have byelaws to stop people jumping off our structures.)</p> <p>Our enforcement officers do wear uniforms.</p> |

| CONSULTEE<br>(LETTER DATE)                                       | COMMENTS  | RESPONSE  |
|--|---|---|
| The East Anglian Waterways Association Ltd<br>(27.05.99)         | The Association deplors this mindless vandalism and congratulates the Agency on the installation of security boxes at 7 sites.<br><br>It is hoped that Proposal 1 can be progressed as a matter of urgency. | Noted.<br><br>The three security boxes at Bedford, Godmanchester and Brownhill locks have been installed. |
| Huntingdon Canoe Club & Cambs Canoeing Association<br>(03.06.99) | Details of who to contact in cases of vandalism could be advertised more widely, to deter would-be vandals. There are usually other people within 'ear-shot' and mobile phones are more common.             | Noticeboards (in the main) advertise the free 0800 807060 number for this reason.                         |
| IWA, Head Office<br>(21.06.99)                                   | IWA welcomes the implementation of measures, such as security boxes, to discourage vandalism of locks and would support their use wherever there is a problem.  | Noted.  |

### 3.8 Needs for Monitoring and Further Investigation

#### ISSUE 19 PUBLIC CONCERN OVER THE FINDINGS OF THE EUROHAZCON STUDY

| CONSULTEE<br>(LETTER DATE)                  | COMMENTS   | RESPONSE  |
|---|--|---|
| CPRE – Mid Beds<br>(23.04.99)               | Proposals 1 and 2 are strongly supported. This is a high priority Issue that particularly affects the Group's district.  | Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)           | 'Do nothing' is not an option.<br>Proposals 1 and 2 should be pursued and given high priority in view of the likelihood of a serious causal link to human health.                                      | Noted.  |
| Cambridgeshire County Council<br>(01.06.99) | The importance of monitoring all closed landfill sites should be acknowledged. It is essential for early detection of pollution etc. Remedial action must be undertaken where problems are identified. | Monitoring of currently licensed landfills, whether they are operational or in the post closure stage, is the responsibility of the licence holder. The Agency has powers and duties to regulate these sites, and this is done as part of our routine work. It is therefore outside the remit of the LEAP.<br><br>Historic landfill sites that are no longer the subject of a waste management licence are contaminated land, for which new legislation is likely to come into force during the life of this Plan. The Agency is committed to working with local authorities regarding these sites. Many have minimal pollution risk associated with them, but some are known to have a deleterious effect on the water environment and are the subject of investigation and remedial action, where funding for this work can be secured. |

| CONSULTEE<br>(LETTER DATE)                         | COMMENTS   | RESPONSE |
|--|--|----------|
| Mid Bedfordshire<br>District Council<br>(02.06.99) | Support for further research at Elstow and Flitwick is welcome. However, the 'disadvantage' should be deleted. Whether or not a link is established, local residents must be supplied with the relevant information and this should be an open, transparent process. | Noted.   |

### 3.9 Improving flood defences

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS   | RESPONSE  |
|--|--|---|
| IWA - Cambridge<br>(15.05.99)                  | It is hoped that the needs of and dangers to boaters and boats will not be forgotten.  | Noted. Procedures are in place for this.  |
| Cambridgeshire<br>County Council<br>(01.06.99) | The Council welcomes the inclusion of this as a major issue. In the face of expected development pressures in the Ouse corridor, the Agency should take a strategic lead and co-ordinate work with others to identify integrated solutions to flood control and land drainage.<br><br>There is need for clear guidance on who should be responsible for balancing ponds and other structures created to control drainage flows to watercourses. Perhaps these matters should have been flagged as separate issues. | We continue to support the need for a strategic approach to flood control and land drainage.<br><br>Issues relating to the adoption of balancing ponds and other drainage infrastructure are frequently not straightforward. We will continue to advise on a site-specific basis. |

### ISSUE 20 IMPLEMENTATION OF THE BYE REPORT RECOMMENDATIONS

| CONSULTEE<br>(LETTER DATE)    | COMMENTS  | RESPONSE   |
|-------------------------------|---|--|
| CPRE - Mid Beds<br>(23.04.99) | Proposals 1, 2, 3 and 4 are supported.<br><br>The area covered should include the Ivel Navigation and the Agency's stretch of the River Flit. Although this area did not flood severely at Easter 1998, it was 'within an ace' of doing so. | Noted.<br><br>The Agency is undertaking an asset survey on all Main Rivers, working in partnership with landowners. We expect to complete this by April 2000. A prioritised programme of flood warning improvements is being developed for implementation over the next 2-3 years. |

| CONSULTEE<br>(LETTER DATE)                                     | COMMENTS  | RESPONSE  |
|--|---|---|
| Bedford Group of<br>Drainage Boards<br>(10.05.99)              | <p>As Proposals centre on flood warning and do not mention watercourse maintenance works, public expectations of warnings could be higher than the Agency can provide. This also puts higher priority on warning than on maintenance.</p> <p>The Bye Report says 'maintenance has been carried out to achieve environmental gains at the expense of hydraulic efficiency'.</p>  | <p>As stated in the supporting text for this issue, the five Proposals are only a selection of specific actions being progressed from the Bye Report. Maintenance has always been an important part of the Agency's Flood Defence work and remains so.</p> <p>The report actually states that there are "a few undefended village locations where watercourses through and downstream of developed areas have been maintained to achieve environmental gains and these may have been at the expense of hydraulic efficiency". The extent to which maintenance activities can incorporate any environmental gains is being considered on an individual basis, to ensure the correct balance.</p>   |
| The East Anglian<br>Waterways<br>Association Ltd<br>(27.05.99) | <p>Proposal 4 should proceed, despite the costs, as quickly as possible.</p> <p>Users of the navigation also need to be alerted to floods. Locally-based craft users could perhaps be contacted through boatyards, marinas and clubs, but for visiting craft some form of bankside notice is needed.</p>  | <p>Investigation will take place in 2000.</p> <p>A system is currently in place with boatyards and marinas. Many locks already have signs to warn of high flows, and more will be provided. Warnings are also broadcast on radio and television. Riverbank signs or warning flags would be vulnerable to theft and vandalism, with no means to ensure that they remained where placed.</p>  |
| CPRE – Bedfordshire<br>(27.05.99)                              | <p>The Branch supports Proposals 1 and 4 (2 and 3 are outside its area), but the area covered should include the Rivers Ivel and Flit.</p> <p>It is important to use floodplains as natural floodwater stores, provided life and built property are not put at risk. The Agency's role in recommending refusal of built development in floodplains is vital.</p> <p>Uncontrolled upstream development (eg at Milton Keynes) without adequate local run-off storage puts downstream settlements at risk, however good the alarm systems are. We suggest a priority programme of surveys and analysis of run-off rates and local storage/floodplain mitigation both in this LEAP area and upstream, and remedial measures to contain downstream flows following heavy rainfall.</p> | <p>The Rivers Ivel and Flit (Main River section) will be included in both asset survey and investigation into flood warning arrangements.</p> <p>Development should not take place if it has an unacceptable risk of flooding, leading to danger to life, damage to property or wasteful expenditure on remedial works. We will continue to oppose development that will impact adversely on land drainage. We seek to retain natural floodplains and, where practicable, restore their natural functions.</p> <p>A review of the standards of protection for urban areas is being carried out at present. The results of this survey will be used to identify and prioritise future flood defence works, which are subject to justification and funding constraints.</p> |
| Cambridgeshire<br>County Council<br>(01.06.99)                 | Proposals to provide an effective flood warning system and to improve flood defences are welcome.   | Noted.  |

| CONSULTEE<br>(LETTER DATE)     | COMMENTS   | RESPONSE  |
|--------------------------------|--|---|
| IWA, Head Office<br>(21.06.99) | IWA is concerned that the recommendations do not go far enough in warning boaters of the risks of flooding and strong streams. A voice messaging system is wholly inadequate. There is a real need for warnings to be placed on the riverbank, so that boaters can receive the information and safely moor up before being caught in strong flows. | The flood warning system is being reviewed on a regional basis and we will be implementing proposals for increased automatic voice messaging and strong stream advice. Many locks already have signs to warn of high flows, and more will be provided. Warnings are also broadcast on radio and television. Riverbank signs or warning flags would be vulnerable to theft and vandalism, with no means to ensure that they remained where placed. |

#### ISSUE 21 REVIEW OF CURRENT STANDARDS OF FLOOD PROTECTION

| CONSULTEE<br>(LETTER DATE)                      | COMMENTS  | RESPONSE  |
|---|---|---|
| CPRE – Mid Beds<br>(23.04.99)                   | The Group supports Proposal 1.  | Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)               | Proposal 1 is supported, provided the environmental implications are given high priority. The containment of floodwater upstream is preferred (see also Issue 20).  | Noted.  |
| Cambridgeshire<br>County Council<br>(01.06.99)  | The Council welcomes all measures to develop awareness of implications of floodplain development, and urges the Agency to undertake studies as soon as possible to identify where flood defence improvements are required.<br><br>The 'do nothing' option is opposed.                                 | Noted.<br><br>This option is not taken forward in the LEAP. |
| Lafarge Redland<br>Aggregates Ltd<br>(02.06.99) | The company's comments on Issue 1 are also relevant to this Issue, as it has a significant number of land holdings close to urban areas. The Elstow Brook development to the south of Bedford is especially relevant. The company would be willing to co-operate in the proposed feasibility studies. | Noted.  |

#### ISSUE 22 NON MAIN RIVER FLOODING

| CONSULTEE<br>(LETTER DATE)                        | COMMENTS  | RESPONSE                         |
|---|---|----------------------------------|
| CPRE – Mid Beds<br>(23.04.99)                     | The Group supports Proposal 1.  | Noted.                           |
| Bedford Group of<br>Drainage Boards<br>(10.05.99) | Local Authorities must be encouraged to use their permissive powers to provide maintenance and flood alleviation works to non-Main River outside IDB areas. | The Agency supports this policy. |

| CONSULTEE<br>(LETTER DATE)        | COMMENTS  | RESPONSE  |
|-----------------------------------|---|---|
| CPRE – Bedfordshire<br>(27.05.99) | Over-maintenance of watercourses and its effect on habitat and landscape is of concern. Maintenance should be limited to that needed to reduce flood risk to life and built property; bankside habitat should not be damaged just to provide access to machinery.<br><br>Limited flooding of open farmland can benefit wildlife and limit downstream flooding at times of high flows. Channel excavation to speed floodwater downstream is not the most sustainable solution. | After the protection of people and property from flooding, conservation is a primary consideration in all watercourse maintenance operations.<br><br>Noted. |

#### Chapter 4 A Better Environment Through Partnership

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS   | RESPONSE   |
|--|--|--|
| Marston Vale<br>Community Forest<br>(15.04.99) | The Community Forest team would be pleased to be included as partners in any projects involving landscape and conservation enhancements or provision of recreation facilities in their area. | Noted but, as the Marston Vale is located in an IDB area, the Agency has few opportunities to be involved in projects there. |
| RSPB<br>(01.06.99)                             | The RSPB supports the key issues identified in Chapter 4, especially Theme 4.  | Noted.   |

#### 4.1 Strategic Environmental Issues

| CONSULTEE<br>(LETTER DATE)        | COMMENTS  | RESPONSE |
|-----------------------------------|---|----------|
| CPRE - Mid Beds<br>(23.04.99)     | The Group appreciates the Agency's forward vision in tackling these longer-term issues, supports all key issues identified, and looks forward to future developments.                         | Noted.   |
| CPRE – Bedfordshire<br>(27.05.99) | The Branch appreciates the Agency's forward vision in seeking to tackle these longer-term issues, and trusts they will not be sacrificed in favour of short-terms actions, however important. | Noted.   |

#### THEME 1 ADDRESSING CLIMATE CHANGE

| CONSULTEE<br>(LETTER DATE) | COMMENTS  | RESPONSE |
|----------------------------|---|----------|
| GOBA<br>(13.05.99)         | GOBA wishes future flood defences to be compatible with navigation and in line with the Bye Report. | Noted.   |

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS   | RESPONSE   |
|--|--|--|
| W B Carter<br>(20.05.99)                       | It is vital that the Agency has the last word concerning applications to build on the floodplain. Agreements made after the 1947 floods have been overruled by Councils, and the same will happen again for the milder Easter 1998 floods. | The Agency has limited direct power to control activities that impact on the functions of floodplains. Whilst we advise Local Planning Authorities (LPAs) and will continue to oppose development that will impact adversely on land drainage, it is the LPAs that have responsibility for protecting the flood defence interests of people whose property may be affected by development programmes |
| The Wildlife Trusts<br>(26.05.99)              | The key issue should include environmental impact and changes in the assessment of flood risk etc.   | Methods for environmental assessment are changing and will allow for consideration of climatic change as the possible effects are identified.  |
| Cambridgeshire<br>County Council<br>(01.06.99) | Combating climate change requires a partnership approach. There is a need to understand the wider nature of the problem and identify how partnerships could be developed at a local level. (See also comments on Chapter 3.)               | Noted.   |

## THEME 2 IMPROVING AIR QUALITY

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS   | RESPONSE   |
|--|--|--|
| The Wildlife Trusts<br>(26.05.99)              | There is an opportunity here to participate in or encourage projects looking to sequester carbon, such as woodland planting. If these are strategically placed will they help 'hold up' rainfall in the heads of catchment areas?  | Noted. Whilst such planting could reduce surface water run-off, any scheme would need to be assessed on an individual basis. |
| CPRE – Bedfordshire<br>(27.05.99)              | Whilst road transport is the prime source of poor local air quality, industrial emissions which spread over a wide area should not be forgotten. (See Issue 10 for comments about emissions from brickworks and landfill in the Marston Vale.)   | Noted.   |
| Cambridgeshire<br>County Council<br>(01.06.99) | The Agency's involvement in the Review and Assessment of Air Quality in Cambridgeshire is acknowledged.<br><br>Little Barford Power Station is of medium significance for air quality in Huntingdonshire and substances that may be burnt in future could cause problems. Agency action is vital to help improve air quality and ensure national objectives are met. | Noted.<br><br>Noted.   |

**THEME 3 MANAGING OUR WATER RESOURCES**

| CONSULTEE<br>(LETTER DATE)               | COMMENTS   | RESPONSE   |
|--|--|--|
| CPRE - Mid Beds<br>(23.04.99)            | The Group strongly supports the key issue of 'reducing water use'. This issue will be critical in enabling the Agency to address many of the other key issues.   | Noted.   |
| Anglian Water Services Ltd<br>(25.05.99) | This section clearly states Agency policy on managing water usage, as referred to in Issues 1, 2 and 3. It is confusing that the table on page 14 includes Issues 14, 15 and 16 under Theme 3, yet they are not referred to here.<br><br>It should be recognised that, in spite of increasing numbers of properties, Anglian Water does not forecast an overall rise in demand for public water supply in the Anglian Region, due to its policies of household metering, leakage control and water conservation through promotion of efficient usage. However, there will be local growth. Any net increase in demand in the Bedford Ouse catchment will be met by use of the Ruthamford system to import water from outside the area. | Noted. The purpose of the table on page 14 was to highlight that each issue might relate to more than one theme. It was not intended to imply that more text would be in chapter 4.<br><br>Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)        | Reduced water use must remain a high priority; it is critical in enabling the Agency to address other Key Issues.<br><br>Groundwater abstraction results in low or no flow in local watercourses. Flows are regularly monitored in Main Rivers but not in small watercourses. These should be surveyed from time to time; local organisations could be invited to participate.   | Noted.<br><br>Proposals for groundwater abstractions are subject to careful technical assessment to ensure flows are not adversely affected. Recent low flows may be as a result of drought. Flows in small watercourses are gauged by Agency staff, especially when licence proposals are being assessed. We would welcome good quality flow data gathered by local organisations to supplement/support our own data. |

**THEME 4 ENHANCING BIODIVERSITY**

| CONSULTEE<br>(LETTER DATE)    | COMMENTS  | RESPONSE   |
|-------------------------------|---|--|
| IWA - Cambridge<br>(15.05.99) | Para 2 says that WLMPs are developed in co-operation with other 'environmental organisations'. How is an environmental organisation assessed? Should not user organisations also be informed and consulted? | Other environmental organisations include those usually involved in the management of the site. User organisations are generally kept informed of the WLMP process and implementation. |

| CONSULTEE<br>(LETTER DATE)        | COMMENTS  | RESPONSE  |
|-----------------------------------|---|---|
| The Wildlife Trusts<br>(26.05.99) | <p>Species and habitats need monitoring to measure success of the BAP process, and the information needs to be readily available. The Bedfordshire Biological Record Centre is being developed as an effective information storage and retrieval facility. The Agency's commitment to support this development would be welcome.</p> <p>More mention should be made of significant species such as the spined loach, bullhead, crayfish, reed bunting, kingfisher and water shrew, which are good indicators of riparian and river health and need survey and regular monitoring.</p> | <p>The Agency fully supports the Biological Records Centre for Bedfordshire and will provide data and other resources where possible.</p> <p>Information about these species is available within the Agency, but the LEAP does not offer the opportunity to address fully every priority species.</p> |
| CPRE – Bedfordshire<br>(27.05.99) | The Agency's involvement is supported. Other areas could be involved in WLMPs, including sites in the Marston and Flit Vales.   | WLMPs have been prepared by the IDB for these areas, eg Flitwick Moor.  |
| RSPB<br>(01.06.99)                | The RSPB welcomes the Agency's approach to ensuring that BAP targets are incorporated into its routine work.  | Noted.  |

**THEME 5 MANAGING OUR FRESHWATER FISHERIES**

| CONSULTEE<br>(LETTER DATE)                        | COMMENTS   | RESPONSE  |
|---|--|---|
| Bedford Group of<br>Drainage Boards<br>(10.05.99) | The statement 'Riparian owners, although not paying any of the Agency's costs' is not correct. They either pay direct, through the General Drainage Charge, or indirectly via IDB rates and council tax. | This statement is referring to the Agency's fisheries activities costs; the text will be amended in the LEAP. |

**THEME 6 DELIVERING INTEGRATED RIVER BASIN MANAGEMENT**

| CONSULTEE<br>(LETTER DATE)    | COMMENTS   | RESPONSE  |
|-------------------------------|--|---|
| GOBA<br>(13.05.99)            | Navigation: GOBA would welcome a feasibility study into re-opening the River Ivel; special attention should be paid to conserving natural and man-made habitats.   | The Agency's navigation function is not financed to restore previous navigation but we would support others prepared to undertake feasibility studies.                        |
| IWA - Cambridge<br>(15.05.99) | <p>IWA believes that this may be the greatest virtue of the Agency.</p> <p>Navigation: The River Ivel comments are noted. A waterway connecting the River Great Ouse at Bedford to the Grand Union Canal at Milton Keynes is still being pursued, as stated in the 'Fen Waterway Regeneration Strategy'.</p> | <p>Noted.</p> <p>Noted. If an abstraction is required to fill the new waterway an abstraction licence may be required. Please contact the licensing section in this case.</p> |

| CONSULTEE<br>(LETTER DATE)   | COMMENTS  | RESPONSE  |
|--|---|---|
| Anglian Water<br>Services Ltd<br>(25.05.99)                            | <p>Water Quality: First time sewerage applications have been received for Tilbrook (24/2/99) and Covington (13/7/99). Assessment is underway for Tilbrook. Covington's has been accepted and appraisal is underway.</p> <p>Anglian Water is not aware of any applications for Hamerton, Old Weston, Upton and Bythorne, although these are on the Agency 'problem' list.</p>  | <p>Noted and taken forward in the LEAP.</p> <p>Noted and taken forward in the LEAP.</p>   |
| The Wildlife Trusts<br>(26.05.99)                                      | <p>Effective liaison with the IDB over its management of headwaters is fundamental. The Ivel and Hiz headwaters are overmanaged and degraded well below their potential for maintaining biodiversity. The Flit needs to be completely integrated into the LEAP. Control of headwaters and rates of entry of water into the Main River is part of the key to flood control in the Main River.</p> <p>Practical steps such as training watercourse cleaning operators to limit damage to the environment and wildlife would be very useful.</p> <p>The Trusts fully support the promotion of buffer strips and would like an officer to be available to raise awareness and assist with the targeting of agri-environment payments to watercourses as part of whole farm assessments.</p> | <p>The Agency and IDBs do liaise. However, we do not have any statutory control over IDBs' management of headwaters. The Hiz headwater comes under the control of North Hertfordshire Borough Council and the Ivel headwater under Beds IDB. The Flit is an IDB watercourse.</p> <p>The Agency has provided conservation awareness training to its own workforce.</p> <p>The Agency recommends this approach where appropriate when responding to Countryside Stewardship Applications.</p> |
| The East Anglian<br>Waterways<br>Association Ltd<br>(27.05.99)         | <p>Recreation: The Agency is congratulated on its welcome involvement with the National Trust in the development work underway at Houghton Mill.</p> <p>Navigation: Whilst some lock structures on the River Ivel have been demolished, several others survive, navigation levels are still held at some sites, and most bridges maintain navigational headroom. The Association welcomes the Agency's acknowledgement that the restoration may be feasible, and hopes that it would co-operate with an engineering feasibility study as a prelude to its suggested cost benefit analysis and environmental impact assessment.</p>  | <p>Noted.</p> <p>Noted. The Agency would support others (priority dependant) who wish to undertake an engineering feasibility study.</p>  |
| CPRE – Bedfordshire<br>(27.05.99)                                      | The Branch has some concerns about the restoration of navigation on the former River Ivel Navigation. Subject to detailed environmental assessment, it would consider supporting reopening for non-motorised craft only, together with towpath restoration and access on foot.  | CPRE would be consulted by any organisation wishing to restore navigation on the River Ivel.  |
| Huntingdon Canoe<br>Club & Cambs<br>Canoeing Association<br>(03.06.99) | Navigation: The River Ivel has been used by canoeists and anglers, and navigation could be improved by addition of portages and 'safe' water slides in the medium term.   | The Agency is not the Navigation Authority for the River Ivel. This would have to be referred to the riparian owners.   |

| CONSULTEE<br>(LETTER DATE)     | COMMENTS  | RESPONSE                    |
|--------------------------------|---|-----------------------------|
| IWA, Head Office<br>(21.06.99) | <p>Recreation: IWA strongly supports the improvement of recreation through partnerships. Houghton Mill's restoration will provide an important source of education and it will no doubt prove very popular with local residents and visitors to the area.</p> <p>Navigation: IWA is pleased at the Agency's positive approach to investigating the restoration of navigation to the River Ivel and hopes that it will continue to support further studies and analysis and play an active part in instigating such studies.</p> | <p>Noted.</p> <p>Noted.</p> |

## THEME 7 CONSERVING THE LAND

| CONSULTEE<br>(LETTER DATE)                           | COMMENTS  | RESPONSE  |
|--|---|---|
| Bedford Group of<br>Drainage Boards<br>(10.05.99)    | The Group welcomes and supports the inclusion of the Marston Vale Community Forest/Bedfordshire & River Ivel IDB partnership (page 47).   | Noted.  |
| South Bedfordshire<br>District Council<br>(14.05.99) | Table 3 should be updated to refer to the South Bedfordshire Local Plan Review – Deposit May 1999.  | Noted and taken forward in the LEAP.  |
| The Wildlife Trusts<br>(26.05.99)                    | A renewal of the commitment to maintain an up-to-date alert map of County Wildlife Sites would be welcome, so that potentially damaging operations are avoided in sensitive areas. The Biological Record Centre could service the provision and updating of data.   | The Agency does maintain this in hardcopy. Digitisation of these sites in partnership with the Wildlife Trust is presently being investigated.<br>We have also produced a Development Constraints document that includes details of these sites.  |
| CPRE – Bedfordshire<br>(27.05.99)                    | <p>The Agency's role in development planning is vital, yet it sometimes seems that the Agency is reluctant to <i>object</i> to unacceptable built development and prefers to <i>comment</i>, which carries less weight with local planning authorities.</p> <p>Consideration of all water resource implications must be given high priority. It is insufficient to rely on a water company's claim that it can supply a development provided the cost is met.</p> <p>Bearing in mind the very large residential developments at Biggleswade, Sandy and the Biddenham loop, the new settlement proposal for Elstow Storage Depot cannot be said to represent the majority of development in the LEAP area (page 47).</p> <p>CPRE strongly supports the key issue on page 50.</p> | <p>Agency concerns about built development can often be overcome by appropriate design, and controlled through conditions attached to a planning permission. If so, we inform the Planning Authority of potential problems and encourage early consultation with developers to address these issues. If we cannot envisage works that will address our concerns, an objection is registered.</p> <p>Water resources are discussed with local planners and water companies. It is anticipated that the proposed development can be supplied under existing licences.</p> <p>The LEAP refers to the 'Elstow Brook area' which includes several other developments in addition to the new settlement at Elstow. We accept that this might not outweigh all other development in the LEAP area, but it is a major allocation.</p> <p>Noted.</p> |

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS  | RESPONSE  |
|--|---|---|
| Cambridgeshire<br>County Council<br>(01.06.99) | <p>Land Use Planning: The Council welcomes the Agency's involvement in development planning; its input is vital, eg through providing constraint information and waste statistics.</p> <p>The Government, through revision of PPG12, proposes changing the Local Plan preparation process. Initial consultation will be through Issues Papers and there will be a two-step Deposit Plan stage.</p> <p>Table 3:<br/>i) The Cambs Structure Plan Review is likely to commence in summer 1999. It will be undertaken jointly with Peterborough City Council.<br/>ii) The Cambs (Aggregates) Minerals Local Plan Review is likely to commence following the government's review of MPG6 'Aggregates Provision in England'.<br/>iii) South Cambs Local Plan – a Deposit Plan was published in February 1999.</p> | <p>Noted.</p> <p>Noted.</p> <p>Noted and taken forward in the LEAP.</p> <p>Noted and taken forward in the LEAP.</p> <p>Noted and taken forward in the LEAP.</p> |

**THEME 8 MANAGING WASTE**

| CONSULTEE<br>(LETTER DATE)                        | COMMENTS  | RESPONSE  |
|---|---|---|
| Bedford Group of<br>Drainage Boards<br>(10.05.99) | IDBs have no 'responsibility' for clearing litter. Responsibility rests with the riparian owner.  | Noted and taken forward in the LEAP.  |
| Cambridgeshire<br>County Council<br>(01.06.99)    | <p>Working towards sustainable resource use and waste management should be a priority key issue for the Agency, which should take a lead role in promoting waste minimisation initiatives. Partnership working to promote re-use and recycling is always welcomed.</p> <p>The text fails to mention the County Council Household Waste Recycling Centre at Buckden which accepts trade waste (for a charge) as well as household waste.</p> | <p>The Agency confirms its wish to work in partnership with local authorities and other bodies but recognises that its influence on household waste minimisation is likely to be small compared to Local Authorities'. It will concentrate its efforts, in partnership with others, on manufacturing industry and the service sector.</p> <p>The text highlighted significant population areas that are considered to be lacking local facilities. The presence of a new site at Buckden, which also receives trade waste, is welcomed.</p> |

**THEME 9 REGULATING MAJOR INDUSTRIES**

| CONSULTEE<br>(LETTER DATE)                           | COMMENTS  | RESPONSE |
|--|---|----------|
| South Bedfordshire<br>District Council<br>(14.05.99) | There is one Part B prescribed process in the Council's area of the LEAP. Information about this and landfill sites is available. | Noted.   |

## 4.2 Local Agenda 21 and Biodiversity Action Plans

| CONSULTEE<br>(LETTER DATE)                              | COMMENTS  | RESPONSE  |
|---|---|---|
| CPRE - Mid Beds<br>(23.04.99)                           | The Group agrees with the Agency's comments, looks forward to future progress, and hopes appropriate resources will be secured.   | Noted.  |
| Bedford Group of<br>Drainage Boards<br>(10.05.99)       | Table 4 – Bedfordshire BAP: The Bedford Group of Drainage Boards should be included in the list of Partners.  | This table has now been updated from the Joint Nature Conservancy Council (JNCC) web site.  |
| English Nature - Beds<br>Cams & Northants<br>(12.05.99) | Table 4 will need updating to reflect progress with Action Plan preparation in Bedfordshire.<br><br>The Agency should play an active role in the development and implementation of LBAPs, working with a wide range of partners at county level. An action should be identified in the LEAP to acquire and review relevant Action Plans, so as to incorporate activities into the LEAP at the annual reviews. | This table has now been updated from the JNCC web site.<br><br>The Agency plays an active part in the LBAP process with conservation officers working on the County Steering Groups and assisting in the preparation of Habitats Action Plans and Species Action Plans. |
| GOBA<br>(13.05.99)                                      | GOBA recognises the importance of this subject and is represented on the Bedfordshire Wildlife Working Group and the River Great Ouse Group.  | Noted.  |
| CPRE – Bedfordshire<br>(27.05.99)                       | The Branch agrees with the comments on LA21 and BAPs, looks forward to seeing progress in the future and hopes to see the necessary resources secured.  | Noted.  |
| Cambridgeshire<br>County Council<br>(01.06.99)          | Local Agenda 21: 'Cambridgeshire and Peterborough's State of the Environment Report 1998' has been published.   | Noted and taken forward in the LEAP.  |

## 4.3 Education and Awareness

| CONSULTEE<br>(LETTER DATE)                     | COMMENTS   | RESPONSE |
|--|--|----------|
| Cambridgeshire<br>County Council<br>(01.06.99) | The Council welcomes the Agency's commitment to Education and Awareness. This should be integral to all areas of the Agency's work. Proposals for action could be incorporated under the relevant Issues, thus raising the profile of this important area of work. | Noted.   |

## Chapter 5 Next Steps

No comments received.

## Appendices

| CONSULTEE<br>(LETTER DATE)                        | COMMENTS  | RESPONSE   |
|---|---|--|
| Alconbury &<br>Ellington IDB<br>(08.03.99)        | Appendix A (Flood Defence) is incorrect; under Section 25 of the Land Drainage Act 1991, the Agency has powers to serve notice to ensure maintenance of flows.                    | Noted and taken forward in the LEAP.   |
|   | Appendix C: Alternative definition provided for 'Internal Drainage Board'.  | Noted and taken forward in the LEAP.   |
| Bedford Group of<br>Drainage Boards<br>(10.05.99) | Appendix A: There should be reference to IDBs in the Flood Defence section.   | Noted and taken forward in the LEAP.   |
|   | Appendix C: Alternative definition of IDBs supplied.  | Noted and taken forward in the LEAP.   |
| W B Carter<br>(20.05.99)                          | Appendix A, page A4: Weirs have suffered from lack of maintenance in recent years; a proper routine of inspection and clearance is needed, as in Great Ouse River Authority days. | A routine of inspection is in place. However, overall resources are lower than in the Great Ouse River Authority days and necessary maintenance must be prioritised accordingly. |

## 5.0 CONCLUSION

This document has been distributed to all the Consultees who responded and all members of the Area Environment Group.

The LEAP is currently being finalised and will be distributed during December 1999. The Plan will be monitored and reviewed each year, and the results will be published in Annual Reviews. The whole process will be reviewed after five years.

We are grateful to all those who have participated in the production of the Bedford Ouse (Lower Reaches) LEAP.

**APPENDIX A: LIST OF RESPONDENTS**

The following is a list of all those who responded to the Draft LEAP during the consultation period:

Alconbury & Ellington IDB  
Anglian Water Services Ltd  
Bedford Group of Drainage Boards  
British Canoe Union  
Cambridgeshire County Council  
Carter, Mr W B  
CPRE (Bedfordshire County Branch)  
CPRE (Mid Bedfordshire District)  
East Anglian Waterways Association Ltd  
English Heritage (East of England Region)  
English Nature (Bedfordshire, Cambridgeshire & Northamptonshire)  
GOBA  
Huntingdon Canoe Club/Cambridgeshire Canoeing Association.  
Ivel Valley Countryside Project  
IWA (Cambridge Branch)  
IWA (Head Office, Rickmansworth)  
Lafarge Redland Aggregates Ltd  
Marston Vale Community Forest - now known as the Forest of Marston Vale  
Mid Bedfordshire District Council  
Ouse Valley River Club  
Priory Country Park Fisheries Warden  
RSPB  
South Bedfordshire District Council  
Sport England - previously English Sports Council (East)  
Swavesey IDB  
Three Valleys Water Company  
The Wildlife Trust for Bedfordshire, Cambridgeshire, Northamptonshire and Peterborough

**APPENDIX B: ABBREVIATIONS**

|           |      |   |
|-----------|------|---|
| AEG       | .... | Area Environment Group                          |
| AMP       | .... | Asset Management Plan                           |
| AWS       | .... | Anglian Water Services Ltd                      |
| BAP       | .... | Biodiversity Action Plan                        |
| BCU       | .... | British Canoe Union                             |
| Beds      | .... | Bedfordshire                                    |
| Cambs     | .... | Cambridgeshire                                  |
| CMP       | .... | Catchment Management Plans                      |
| CPRE      | .... | Council for the Protection of Rural England     |
| EN        | .... | English Nature                                  |
| EU        | .... | European Union                                  |
| GOBA      | .... | Great Ouse Boating Association Limited          |
| Herts     | .... | Hertfordshire                                   |
| IDB       | .... | Internal Drainage Board                         |
| IWA       | .... | Inland Waterways Association                    |
| JNCC      | .... | Joint Nature Conservancy Council                |
| LA21      | .... | Local Agenda 21                                 |
| LBAP      | .... | Local Biodiversity Action Plan                  |
| LEAP(s)   | .... | Local Environment Agency Plan(s)                |
| LPA       | .... | Local Planning Authority                        |
| MAFF      | .... | The Ministry of Agriculture, Fisheries and Food |
| MPA       | .... | Mineral Planning Authority                      |
| MPG       | .... | Mineral Policy Guidance                         |
| Northants | .... | Northamptonshire                                |
| NSA       | .... | Nitrate Sensitive Area                          |
| NVZ       | .... | Nitrate Vulnerable Zone                         |
| PPG       | .... | Planning Policy Guidelines                      |
| PWS       | .... | Public Water Supply                             |
| RSPB      | .... | Royal Society for the Protection of Birds       |
| SSSI      | .... | Site of Special Scientific Interest             |
| STW       | .... | Sewage Treatment Works                          |
| WLMP      | .... | Water Level Management Plan                     |
| WPA       | .... | Waste Planning Authority                        |
| WRA91     | .... | Water Resources Act 1991                        |

**APPENDIX C: AEG SUB-GROUP AND PROJECT TEAM MEMBERSHIP****Representatives of the Great Ouse Area Environment Group (AEG)**

Tony Albone  
Charles Bootle  
Colin Clare  
Dennis Ford  
David Jones  
Derek King  
Richard Payne

**Project Team**

|                  |  |
|------------------|--|
| Innes Jones      | Environment Protection Manager (Project Executive) |
| Jackie Sprinks   | LEAPs Officer (Project Co-ordinator)               |
| Pauline Jones    | Tactical Planning Officer                          |
| John Parkinson   | Flood Defence Officer – Flood Warning              |
| Alan Rich        | Team Leader – Planning Liaison                     |
| Martin Slater    | Team Leader - Conservation                         |
| Alison Whitehead | Resource Planning Officer                          |
| Liz Williams     | Environment Protection Officer                     |
| Steve Wiltshire  | Team Leader - Environment Protection               |