

Box 12

LOCAL ENVIRONMENT AGENCY PLAN

EXE

SUMMARY OF PUBLIC CONSULTATION RESPONSES

JULY 1999 - OCTOBER 1999



**ENVIRONMENT
AGENCY**

February 2000

SUMMARY OF PUBLIC CONSULTATION PROCESS

The Environment Agency launched the Exe Local Environment Agency Plan (LEAP) Consultation Draft for public consultation in July 1999. Over 500 copies of the Consultation Draft were distributed which gave individuals and organisations the opportunity to comment on the environmental issues within the catchment.

The Consultation Draft followed the format of the final Action Plan with draft costs and timescales. Maps were only printed to illustrate issues mentioned in the text of the document.

An issue will arise if there is either:

- Insufficient information to assess whether a problem is real or not
- A current or likely future shortfall against a known target, standard or objective
- A matter of serious public concern
- An opportunity for environmental enhancement.

The three-month consultation period ended on 5 October 1999 and the Agency has received written responses from 68 individuals and organisations. These responses have been collated and summarised in the following pages, and include our comments on the points raised.

The LEAP Exe Action Plan will be published in July 2000.



ENVIRONMENT AGENCY

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Issue 1 IMPACT OF FARMING		
Respondent	Summary of Comments	Agency Response
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	One of the major sources of pollution is the movement of cattle along roads and lanes. Their dung is left along the roads and is washed into the watercourses after the next rainstorm. The practice of stacking dung near watercourses continues.	Cattle dung on roads is not considered to be a major source of pollution of watercourses in this catchment. Farmers are well aware of their responsibilities and the consequences. The highway authority may become involved if large amounts are concerned. We actively discourage this practice. Anybody with specific information should contact us.
Mr T P B Hoggarth Deputy Director The Atlantic Salmon Trust Surrey	Mention is made of the adverse effects of use of sheep dips on Page 13. It is disappointing that a special action regarding best practice for their use is not included as a specific action.	We did not include an action as this type of advice is given routinely when farms are visited. There is also much literature available concerning best practice, including the 'Code of Good Agricultural Practice'.
Mr Ken Buswell Conservator – The West Country Forestry Commission Exeter	I suggest Issue 1 on page 11 is Farming <u>and</u> Forestry, particularly as most of the woodlands within the catchment are growing on valley slopes.	This section covers environmental problems in the catchment. As we are not aware of any problems with forestry in the catchment forestry does not feature here. Forestry is covered under Land Use on Page 7.
Mr A D Kilby Chairman The River Exe & Tributaries Association	Proposed preamble to the RQO non-compliance from Bickleigh Castle to Thorverton Gauging Station was to record the considerable conversion of permanent pasture adjoining the river to arable use which has taken place recently as a potential cause of the suspected land run-off. Also at this stretch of the Exe has several incoming streams in an area where most dwellings have no mains drainage.	The 1998 compliance assessment of the three years of monitoring data shows that the River Exe from Bickleigh Castle to Thorverton Gauging Station now passes its long term RQO of RE1. This is no longer an issue and the action to investigate the cause of the failure will be removed from the Action Plan. It is considered that Bickleigh STW and Fisherman's Cot public house sewage effluent discharges may have contributed to 1997 marginal failure. Improvements were made to both sites in 1998. It is not considered that conversion of permanent pasture to arable use made a significant contribution to the failure.
Mr David Hogan Royal Holloway Institute for Environmental Research	RQO non-compliance (R Kenn). It's not the heavy rainfall that causes failure but the land management (exposed bare surfaces on soils vulnerable to erosion). What action is proposed for groundwater quality data?	Agreed we will amend the text accordingly. We are considering a national strategy for groundwater monitoring. The costs are high and will need to be considered alongside our other priorities.

<p>Mr David Hogan Royal Holloway Institute for Environmental Research</p>	<p>Farm practices – Unclear about the emphasis on purple moor-grass and rush pasture on the Blackdowns. I would have thought that the seepage areas and associated heaths were more important. Areas of the former types mentioned tend to indicate poor management and lack of biodiversity.</p>	<p>This appears to be an error. The emphasis within the Blackdown Hills is on species-rich haymeadows and heathland and not rush pasture/purple moor-grass. We will amend the text for the Action Plan. We are also supporting spring-line mires and associated habitats in the Blackdowns.</p>
<p>Mr Hugh Maund Chairman Exe Valley Fishery</p>	<p>Diffuse discharges are highlighted as main cause of pollution incidents yet unlike single point dischargers do not pay licence fee. Some method should be developed to include them in licence scheme.</p>	<p>Diffuse inputs into watercourses are ubiquitous and difficult to pinpoint. Such 'discharges' are rainfall related and it is deemed inappropriate to charge for rainfall runoff. Where poor management practices persistently cause specific problems we seek improvements to land use and management practices.</p>
<p>Mr A D Appleby Clerk to Willand Parish Council</p>	<p>Regeneration of riverbanks – We suggest you should work towards the recreational use of rivers making them more accessible to the general public and thus join up with public footpaths, cycle tracks and new housing estates. It is assumed the public pay towards clearing up rivers, we wonder if private fisheries make any contribution to the costs involved.</p>	<p>All taxpayers contribute to environmental improvement work carried out by the Agency. Owners of private fisheries are not obliged to make any contribution, but many do undertake considerable works themselves to improve the quality of the bankside habitat.</p>
	<p>The policy appears to be to encourage farmers to provide buffer zones to minimise pollutants entering rivers and allow riverbanks to re-generate themselves. Could not 'set-aside' schemes by Government and European Union achieve this and then be taken into Public Ownership? Thus providing much needed recreational areas.</p>	<p>Your comments are noted. The development of grant payments to establish buffer zones is a major issue that we are working on through our farming and rural land use groups. At a local level we seek to influence a number of enhancement schemes through representation during reviews. We recognise the need for recreational areas in parts of the catchment alongside rivers, however, we only promote this where landowners give consent.</p>
<p>Mr Guy Pierce Exeter</p>	<p>I was disheartened to read of the Agency's lack of resolve to address Nitrate pollution. I would appreciate an explanation of your policy on nitrates.</p>	<p>The Government takes decisions on how European Directives will be implemented and our role is to act in accordance with these decisions. It became obligatory for all farms within designated nitrate Vulnerable Zones to comply with published Action Plans. We are putting systems into place to monitor the farms' compliance. We also expect that all farms will abide by the Code of Agricultural Practice for the Protection of Water (MAFF 1998). It is important to put this issue into perspective. Unlike other parts of the country, Devon does not have a problem with Nitrates in Surface Waters. We have some localised groundwater nitrate problems.</p>

<p>Mr Richard Weaving Head of Countryside Management Teignbridge District Council</p>	<p>I support your statement on regeneration of riverbanks and hope to see the further establishment of riverine buffer zones.</p>	<p>Thank you.</p>
<p>The Exmoor Society Dulverton</p>	<p>Referring to Maps 3 & 4, we are very glad to see that all the monitored waters in the National Park are compliant with the RQO. The rivers and streams of Exmoor are a very visual and much enjoyed ingredient of the landscape of the National Park by fishermen and others engaged in the many outdoor pursuits which the moor provides. The maintenance of this good quality must continue to be given a high priority, which in turn will benefit areas downstream.</p>	<p>Agreed. We continually strive to protect current and future water use.</p>
<p>Mr Simon Bates Conservation Officer English Nature</p>	<p>This section under-plays the problem of soil erosion. Work by ADAS identified the area east of the River Exe and Otter as the 'erosion capital of the UK'! We are extremely concerned that the actions do not include working with MAFF to seek solutions to this problem.</p>	<p>We are involved in work on soil erosion at a national level. We had input into the development of the MAFF soil erosion control programme and advisory pack. It included a training programme and farmer discussion groups, one of which was held at Starcross and included Agency Officer visits to share expertise. We were involved in setting up this project and we are discussing with MAFF how to extend this programme. We will expand the text on soil erosion in the Action Plan.</p>
	<p>I understand that MAFF take a lead on promoting guidance on drawing up Waste Management Plans. Or is this a joint lead with the Agency? It would be helpful to explain the different roles of MAFF and the Agency and how they do or do not work together.</p>	<p>The MAFF 'Do-it-yourself farm waste management plans' was a MAFF lead project but we chose the targeted locations. Some farms on the River Clyst were involved in 1996. MAFF has the principle role in providing guidance to farmers on matters of pollution control and conservation. Agency guidance is usually targeted at very specific problems, we aim to complement their work and consult them as appropriate. We will aim to be clear about whom is responsible for what in the Action Plan.</p>
<p>Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire</p>	<p>Synthetic pyrethroids are deadly to aquatic invertebrate life with consequential losses of fish stocks. Could not a dye and antidotes be compulsory purchases when SP chemical is used?</p>	<p>Yes, SPs are highly toxic to invertebrates on the sheep and aquatic invertebrates. We have approached dip manufacturers concerning dye marking for dips, but due to the huge dilution before application and again when entering the environment ensuring the visibility of dyes is very difficult. Although de-activated dip can be 99% less active, the remaining active ingredient could still be acutely toxic and needs to be carefully handled similarly to the untreated product.</p>

<p>Mr Tony Bostock continued.</p>	<p>There is an increasing threat from extensive rearing of sheep therefore I would prefer specific actions to liaise with manufacturers and reduce toxicity of used sheep dip, encourage management practices and an education programme.</p> <p>The Agency's pollution prevention guideline, sheep Dipping: PPG 12 and new Ground Water Regulations are not enough. Sheep dip should be classed as 'controlled waste'.</p> <p>The impact of disposal on terrestrial fauna is poorly documented and needs urgent investigation and an action in the LEAP.</p>	<p>As far as we are aware the number of sheep in the catchment is not increasing, nor is the use of SP based dip. We are undertaking an R&D project to develop, in consultation with representatives from those involved with sheep farming, best sheep flock management practices, which should be published next summer. We have not experienced any sheep dip pollution incidents in Devon, and education for inappropriate disposal is ongoing. The specific actions you propose are all within our recently published National Sheep Dip Strategy (31 March 1999).</p> <p>In addition of PPG12 there is a statutory Code of Good Agricultural Practice guidance on sheep dipping. The take up and adherence to such guidelines is reasonable, so there has been no reason to lobby for further legislation. Under the Ground Water Regulations the land used for sheep dip disposal has to be 'authorised' and if there are any scientific concerns about the suitability of the land, the permit is refused.</p>
<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>There is no mention of the potential impact of Tiverton STW on the Bickleigh Castle to Thorverton Gauging station stretch.</p> <p>We question whether RE2 is realistic for the Clyst Hydon to Clyst St Lawrence stretch.</p> <p>We assume you mean the B3181 for the Ash Clyst Farm to A38 bridge at Broadclyst stretch.</p> <p>No mention is made of the impact of Punchbowl Waste Disposal Site on the Creedy stretch.</p>	<p>This is a long way downstream of Tiverton STW, which is performing well, as shown by water quality data from immediately upstream and downstream of the works as well as for the final effluent. Our field staff consider the most likely cause to be diffuse agricultural pollution.</p> <p>An RQO of RE4 with a long-term target of RE2 was proposed for this stretch in December 1995 and ratified in the Action Plan of August 1996.</p> <p>You are correct the road reference should be B3181. We will amend the Action Plan and our records accordingly.</p> <p>We reported on Punchbowl closed landfill site under Issue 3, page 19.</p>

<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>Farming Practices - Whilst it is a question of degree we question whether it is worth bothering about modest levels of diffuse pollution.</p> <p>Sheep Dips – We would welcome a copy of the results of the pilot Exmoor study. It is important that views are backed up by fact.</p> <p>Bankside trees – This is subjective commentary without specific evidence. Someone will have to pay for replanting.</p>	<p>Point source pollution has dramatically improved and diffuse pollution from agriculture is considered a major cause of aquatic pollution in the catchment. Certain practices can and should be avoided and we try to bring this to farmers' attention. A formal report of the Exmoor study is not being published. The results will be made available on request.</p> <p>We have extensive experience of works in rivers and tree removal; therefore we are likely to give one of the least subjective views available.</p>
<p>Mr Morley Williams Principal Scientist (Devon) South West Water Ltd Exeter</p>	<p>Cryptosporidium – In response to an agreement with the British Retail Consortium and to concerns from various government agencies, the Water Industry is rapidly phasing out the use of raw sewage sludge to agricultural land and by 1 January 2000. All sludges in the Exe catchment will be treated by one of the approved treatment methods such as mesophilic anaerobic digestion that is an effective means of destroying the viability of <i>Cryptosporidium</i> oocysts.</p>	<p>Thank you for the information we will amend the text for the Action Plan.</p>
<p>Mr Malcolm Vallance Parish Clerk Sandford Parish Council Credton</p>	<p>We welcome the publication of the Consultation Draft and note the observations and plans both for the Exe catchment in general and for the Creedy and Holly Water in particular.</p> <p>In addressing the RQO non-compliance for the Creedy, Holly and Binneford Waters, we encourage the EA to maintain a collaborative and consultative approach with the farming community in determining the precise reasons for non-compliance. We express the hope that the outcome of the 1998 sampling data will have shown improved compliance results.</p> <p>We would also like to propose that the quality of the water be monitored in the stream that runs through Sandford playing field.</p>	<p>Thank you.</p> <p>We will continue to maintain a collaborative and consultative approach with farmers. The 1998 sampling data has shown no improvement in water quality on these stretches, they are all still marginal failures. This means we will have to re-assess our proposed actions.</p> <p>The monitoring criteria for a stretch of water are dependent on the use of the watercourse. The type of monitoring has to be appropriate for a given objective. We would be grateful to receive any information regarding water quality problems in this area.</p>

<p>Ms Nicola Mogford Assistant Farm Conservation Advisor Devon FWAG</p>	<p>We feel that the Exe LEAP has accurately identified the problems apparent in the catchment, and the recommended actions to solve these problems will hopefully be effective with the help of partner organisations such as FWAG.</p>	<p>Thank you.</p>
	<p>It is good to see that the Exe meets most of its RQOs and that they have been set at appropriate standards. Where failure is evident FWAG may be able to help in several ways.</p>	<p>Thank you we enclose copies of the 'Diffuse Pollution' leaflet. We are aware of FWAG's Landwise initiatives and where appropriate discuss them with farmers.</p>
	<p>We recommend that you promote schemes such as the Environmentally Sensitive Areas and Countryside Stewardship to farmers, or try to make other funds available for specific catchment-related improvement work.</p>	<p>Our officers are aware of the schemes you mention and where appropriate they discuss them with farmers. We are acting nationally to influence the development of these schemes.</p>
<p>Mr David Boyce Ecologist Exmoor National Park Authority Dulverton</p>	<p>The RQO non-compliances listed don't appear to relate to the stretches shown on Map 4. There appear to be many more non-compliances than are shown on the map. Could you explain this?</p>	<p>Map 4 only shows the compliance or non-compliance with the current RQOs. The compliance or non-compliance with long term River Quality Objectives is not indicated on this map, instead they are covered in the text.</p>

Issue 2 IMPACT OF EFFLUENT DISCHARGES

Respondent	Summary of Comments	Agency Response
<p>Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association</p>	<p>We submit a lot of overlooked small incidents can lead to a major problem. Many rural communities, housing developments and isolated habitations have septic tanks as a means of effluent disposal but few of the users have any idea of the maintenance and use of them. Strong disinfectants and bactericides kill the necessary bacteria in the tanks causing the discharge of raw sewage into local watercourses.</p>	<p>Many small discharges/incidents can lead to significant impact, however all discharges direct to watercourses require approval through our Discharge Consenting Procedure. Septic tank effluent should not discharge directly to watercourses please let us know of any specific case. 'Package' sewage treatment plants provide secondary treatment and can be permitted to discharge with consent from us. Manufacturers issue guidance on how to maintain and operate them correctly.</p>
<p>Mr A D Kilby Chairman The River Exe & Tributaries Association</p>	<p>In view of the problems with sewage-related debris downstream of Tiverton and the further recent failure of the screening at the West Exe outfall, proposed new action is considered appropriate.</p>	<p>We will insert text on the aesthetic impact of the West Exe sewage pumping station and mention SWWL's new fine screen. We will also include a new action to monitor its performance.</p>
<p>Mr Tom Overthrow Technical Manager, Mead Specialty Paper Devon Valley Mill</p>	<p>We are mindful of our effect on the River Culm both in terms of extraction and discharge of waste effluent. We do have programmes to improve our effluent quality in anticipation of the IPPC legislation.</p>	<p>We welcome your improvement efforts in anticipation of the IPPC legislation. It is not yet clear how consent conditions for individual sites will be affected. This will be determined at a future date on a site by site basis.</p>
<p>Mr Richard Weaving Head of Countryside Management Teignbridge District Council</p>	<p>There is dismay amongst Teignbridge Members and officers over the continuing sewage problems in the Exe Estuary and at Dawlish Warren.</p> <p>We feel more information preceded by more survey work is needed. Can you take steps to trace the origin of the debris? Can you add a new action point to this? Given the debris' apparent easterly origin, we are not confident that the new STW will solve this particular problem.</p>	<p>Regarding your concerns of sewage debris on Dawlish Warren beach we are still of the opinion most of the debris found is not sewage related. The component that is sewage related is most likely to be from the unscreened Dawlish outfall. This situation will be remedied with the completion of the new Dawlish STW which will be in pace by 31 December 2000.</p> <p>We are not aware of any likely sources of sewage debris from the east and it would be extremely difficult to pinpoint them without great expenditure of time and resources. We will review the situation once the new Dawlish scheme is in place and will add an action in the LEAP Action Plan to do this.</p>

<p>Mr K Hill Tiverton</p>	<p>The water quality in Mid Devon is still not high enough. SWW are pumping sewerage into the river at Westfield.</p> <p>The man-made weir takes sewerage under the riverbed to Collipriest is breaking up.</p>	<p>There is a pumping station, storm and emergency overflow at this location, however discharges from it are only authorised under storm conditions or in an emergency, eg power failure. SWW have added a second screen to this outfall SWW pipe sewage under the river here. We are not the owners of this weir, and we are not aware that the weir is breaking up, but will pass on your concerns to SWW.</p>
<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>Tiverton STW – We find it appalling that a contributory factor to a significant failure of the RQO will not be addressed in AMP3</p>	<p>The STW had to be a contributory factor to the failure, however its performance is well within its consented limits and it is performing well. Other factors include a discharge from a textile factory, storm overflow discharges and the input of the River Lowman. Further work needs to be done on this stretch to deal with all of these potential causes equitably. We will amend the text in the Action Plan to reflect this. It is OFWAT and DETR, not the Agency, who determine how much expenditure water companies and their customers can afford.</p>
<p>Mr J P C Shapter Exmouth</p>	<p>Inspect discharges from Exmouth Dock along Exe bank by foot/small boat. Consult local users.</p>	<p>Our local Environment Protection Officer has been in direct contact with you for more information and has inspected the area.</p>

Issue 3 IMPACT OF WASTE GENERATION AND DISPOSAL		
Respondent	Summary of Comments	Agency Response
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	Wildlife is first to be affected by waste disposal. Local wildlife soon colonises disposal sites only to be called vermin and viewed as pests. The attitude needs changing.	The statement in the LEAP is general and not specific. The location and type of fly tipped material is generally not beneficial to wildlife.
Mr A J Page Head of Policy & Heritage Teignbridge District Council Newton Abbot	Fly tipping continues to be a major problem in our area particularly around Exminster.	We are unaware of major fly-tipping at Tood House Lane or Deepway Lane. Please let us have more information upon which we can investigate and consider amending the Action Plan text.
Mr A D Appleby Clerk to Willand Parish Council	More controls and observations of leachate breakouts from waste sites need consideration. We are particularly concerned that Hillhead Quarry is not included in the document.	Hillhead Quarry is licensed only for inert materials and takes little waste now. We are not aware of any problems. Broadpath Landfill site has no problems either; therefore, they were not mentioned in the document. A great deal of groundwater monitoring is undertaken around Broadpath so any leachate will be detected.
	Landspreading of paper sludge and abattoir waste are dealt with as separate items in the document. Willand is considered as a trial area for a composting scheme involving both. Why not in the plan?	We mention our co-ordinating role with trials to compost carbon-rich paper sludges with nitrogen-rich abattoir wastes on page 20 and have action 3c and 3d regarding this matter.
Mr Aidan Winder Devon County Council	Ashley Closed Waste Disposal Site – Devon County Council has undertaken works to control the leachate breakout from the site.	We will review this text.
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	Landspreading of paper sludge and abattoir waste – is the Agency sure that the regulations governing this practice are strong enough and enforceable?	Landspreading of wastes to agricultural land under an exemption from Waste Management Licensing is an acceptable and enforceable practice in Devon. The exemptions are policed to such an extent in Devon Area that much suitable waste produced within the County is applied to land outside of Devon. Currently no abattoir waste is disposed via agricultural land in the Devon Area. We still hope to progress trails of composting abattoir waste with paper sludges. The regulations governing the requirements to qualify for an exemption are under review. Proposed amendments are a greater requirement for pre-treatment of waste prior to spreading, and more emphasis on the need to demonstrate that the practice will bring agricultural benefit.

<p>Mr Tom Overthrow Technical Manager Mead Specialty Paper Devon Valley Mill</p>	<p>The document covers all areas of concern. We are keen to push the merits of landspreading of paper sludge. We would support its application with or without combination of abattoir waste onto local fields so long as its management is controlled by an authorised third party. We are also keen to dissociate paper sludge from sewage sludge farms.</p>	<p>Noted thank you.</p>
<p>Mr Richard Weaving Head of Countryside Management Teignbridge District Council</p>	<p>I was interested to read that fly-tipping was not a major concern in the catchment. It is a major concern in the Teign catchment on Haldon. I hope you will help with prosecutions wherever possible.</p>	<p>Last year we took a prosecution on Haldon and are investigating two further cases. We continue to respond in accordance with the memorandum of understanding between the Agency and local authorities. We will review this text.</p>
<p>Mr Tony Bostock Member Midlands FRERAC & Upper Severn AEG Staffordshire</p>	<p>Landfill tax rebates for environmental improvements – I fully support this scheme, but it has been poorly publicised and appears difficult to get applications approved and funds allocated. Is it possible to raise the profile for this scheme via the action plan?</p>	<p>Ultimately the take up of the landfill tax rebate scheme for environmental improvements is down to the individual operators of landfill sites. Larger national operators are good at allocating the money. ENTRUST are the body responsible for promoting and regulating the landfill tax scheme. In some instances we have helped to encourage operator participation, but our primary role is as the waste regulator which must not be compromised.</p>
<p>Mr Noel Waine Secretary – East Devon Group The Council for the Protection of Rural England</p>	<p>It is not clear what is meant by 'amendment materials' on page 20.</p>	<p>Locally available materials such as feathers and straw are classed as 'amendment materials'. These are used with the paper sludges to speed the composting process and to improve the structure of the resulting compost, which can be used for agricultural benefit. We will clarify the text for the Action Plan.</p>
<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>Is the review of the spreading of waste to agricultural land national or local? If the latter we would wish to participate in the review.</p>	<p>The exemption procedure is currently being reviewed at a national level with the DETR.</p>
<p>Mr Morley Williams Principal Scientist (Devon) South West Water Ltd Exeter</p>	<p>Landfill – Need to refer to the new land-fill at Broadpath, Uffculme including the proposed safe treatment at Uffculme STW subject to the advanced provision of adequate treatment capacity being provided at the works.</p>	<p>Agreed – To be included in the Action Plan.</p>

Issue 4 POTENTIAL FOR EUTROPHICATION		
Respondent	Summary of Comments	Agency Response
Mr Derek Harding Exeter	I note that the Exeter Ship Canal eutrophication problem is exacerbated by the stagnant nature of the water in the canal. Increased traffic with its accompanying water changes as locks were opened would presumably help.	We are working on proposals for a management plan for the Exeter Canal in partnership with other organisations and interested parties. We have forwarded your comments to the Canal Manager at Exeter City Council.
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	The only real answer is to stop excessive use of fertilisers on land. Organic farming will change the problem from algal blooms to a de-oxygenating effect on the waters due to the oxygen demand required to breakdown the organic products.	The problem of excessive nutrients reaching watercourses is complex. It is not just spreading of organic and inorganic fertilisers, but also the ease of pathways from the land to the watercourse.
Mr Aidan Winder Devon County Council	Grand Western Canal – comments about water quality are noted, but the siltation and other factors are not included in the LEAP. Additional reference to an ongoing dredging programme and buffer strips is needed.	We will review the text to include reference to the accumulations of sediment in the canal. We would support DCC undertaking dredging and where possible encourage the use of buffer strips.
	Weed cutting – the programme implemented on the Canal is to be reviewed as part of the Management Plan and we would welcome further input from the Agency.	We welcome the opportunity to comment.
	Input of water from Fenacre Quarry is only a remedial measure and cannot be used as a routine supply.	We note your comment and will amend the text of the Action Plan.
	Water quality sampling points used by the Agency and located in the Canal basin and at Fenacre do not properly reflect conditions elsewhere within the Canal.	The GQA monitoring point was moved from the basin further upstream to Tidcombe Bridge. To be truly representative data from ten or more points would be needed, but unfortunately funds are not available to support this level of monitoring.
Mr Richard Weaving Head of Countryside Management Teignbridge District Council	I have not heard anything on the Exeter Canal Management Plan for about twelve months.	We are also concerned about the lack of progress and would welcome your support. Any concerns should be addressed to Exeter City Council.
	I was interested to read that Exe Estuary is being investigated as a potential Sensitive Area (Eutrophic). What management actions might be required following such a designation?	The Urban Waste Water Treatment Directive potential <i>sensitive area</i> monitoring data has now been gathered and is being assessed to determine if there is a case to put forward to DETR. If DETR agree the implications are that nutrient removal will be required at certain STWs discharges.
Mr Simon Bates Conservation Officer English Nature	Could the failure of the Exeter Canal under the EC Freshwater Fish Directive be due to weather in 1997? How long have oxygen levels in the Canal been monitored? I would be surprised if the low levels were	We agree it is unlikely that farm nutrients are washed directly into the Exeter Canal, however phosphate levels are sometimes elevated in the River Exe, above the canal. The canal failed the EC FWFD standard for DO in 1997 although it passed in 1996

Mr Simon Bates continued	due to farm nutrient runoff as the canal is 'above' the catchment for much of its length and our information, certainly on the Exminster Marshes, is that applications of fertilizer are minimal compared with dairy grassland.	and 1998. Our data shows that the lowest DO results are found in early morning in the summer months. This indicates plant respiration is the cause. Lack of flow in the canal exacerbates the low DO problem, with re-aeration being much slower in still waters than in fast moving rivers. Such low DOs are commonly experienced in still waters with prolific plant growth in summer. Concerns with the level of plant growth in the canal need to be addressed as part of an integrated management plan for the canal. We will change the text in the LEAP accordingly.
	What will the implications be of the 'Sensitive Area (Eutrophic)' status of the Exe Estuary?	See response to Mr Richard Weaving above.
Mr Neil Edwards Executive Director The Inland Waterways Association	We support the positive measures outlined to improve water quality on the Grand Western Canal and welcome the Agency's endorsement of the need for the Exeter Canal Management Plan. A primary objective must be to maintain recreational use whilst increasing environmental quality. It is important that full consultation with interested parties should take place before any plans are finalised.	Noted.
Mr Jonathan Calderbank Development Manager Sport England – South West Region Crewkerne	Sport England has already contributed to the development of a management plan for the Exeter Canal and Quayside. We are supportive of proposals to develop a prescriptive management plan for the Great Western Canal, in particular to realise its recreational potential. Sport England suggests that further work be undertaken to explore the canal's potential.	Noted.
Mr Tony Ellis Consultant: Planning & Environment Royal Yachting Association Reading	The RYA is interested in the fact that eutrophication coincides with the two principal inland navigations in the consultation area. Grand Western Canal – A limited number of powered craft passing up and down the waterway from time to time would introduce a measure of aeration. To retain the quiet nature of the area introduction of electric boats would retain the peace, but would introduce water disturbance needed to oxygenate the canal.	Although increasing the potential for pollution powered craft do keep the water moving. They can provide an amount of aeration and boats also inhibit weed growth. We have forwarded your comments to Devon County Council.
	Exeter Canal – This problem is of a different scale. The disappearance of the sludge vessel is a great loss, with	We welcome examination of such options as part of the integrated management plan.

	reduction in income and reduction in disturbance of waters between the entrance lock and the sewage works.	
Issue 5 IMPACT OF URBAN DEVELOPMENT		
Respondent	Summary of Comments	Agency Response
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	We would welcome early consultation from the Planning Authorities. Modern farming methods and removal of permanent flora can only lead to an increased flow rate of all watercourses. To sterilise the watercourses with concrete culverts and gabions is not the answer.	We have a flood defence role to protect people and the developed environment from flooding. We aim to protect and enhance the environment by promoting works that are sustainable and work with nature.
Mr A J Page Head of Policy & Heritage Teignbridge District Council Newton Abbot	To limit Issue 5 to the impact of 'Urban Development' is possibly a little constraining. No reference is made to the 9,000 houses allocated in the Structure Plan to Teignbridge. Inevitably a proportion will fall within the area of the Exe LEAP. No mention is made of employment land under this issue.	We will amend the title to 'Impact of Development' and mention the allocation of land for housing and employment development from the Structure Plan.
	I support further research being undertaken into water-based historic and archaeological features. I hope the brief would include assessment of historic buildings/features 'at risk' from sea level rise, bank erosion and/or pollution. Also of value if grant funding made available for repairs and maintenance of 'watery' historic or archaeological sites.	Your comments are noted, however, we are not responsible for protection of coastline erosion, unless there are flood defence implications. The future funding for particular projects such as the conservation of historic or archaeological sites is always uncertain.
Mr David Hogan Royal Holloway Institute for Environmental Research	Restriction of tidal and fluvial floodplains; these features also have important value in water quality protection (buffer zones) and flood risk alleviation (retention of floodwater).	Your point is noted and the text will be amended accordingly.
Mr John Wokersien Town Clerk Exmouth Town Council	We support actions regarding road schemes and wish to be notified of any future flood defence schemes. We offer assistance as an information point for local flood warning.	We note your support and confirm that District, Town and Parish Councils are consulted and local knowledge sought when feasibility scheme is carried out. Thank you for your offer of assistance we have passed it onto our regional flood warning section.
Mr Richard Archer Conservation Officer RSPB Exeter	Restriction of tidal and fluvial floodplains – We have significant reservations about the treatment of the issue of integrated floodplain management in the draft document. Overall, we believe that these issues have not been adequately dealt with.	The overall aim of the Agency's flood defence floodplain policies are to secure and, where necessary, restore the effectiveness of floodplains for flood defence and environmental purposes. We are unable to carry out the kind of detailed study you refer to but have forwarded your comments to our national group who are looking at future developments in LEAPs.

Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	Development and flood risk matters – do the consequences of climate change fall under this issue?	We are a statutory consultee in respect of development and flood risk matters. We advise new development should not be at risk and should not increase the risk to existing property or create new risks. It is our policy to strongly recommend that flood plains or flood risk areas should not be developed upon and that development should not take place in risk areas.
	Restriction of tidal and fluvial floodplains – It would be useful to identify appropriate areas for managed retreat. It is important to include a cross-reference to Issue 8. No loss of floodplains should be first principle and authorities should not grant development on such sites. Compensation areas should be considered as a last resort. Additional action needed to identify areas available for managed retreat, to ensure no net loss of tidal and fluvial floodplains.	Your comments are noted and we will revise the text for this section to clarify our position regarding floodplains and development. Flood storage compensation areas are always considered to be a last resort and such schemes are never promoted by the Agency. We draw your attention of issue 15f, which includes a target to restore 10ha of floodplain by 2005. If not sufficient please let us know.
Mr Simon Bates Conservation Officer English Nature	How are 'sensitive flood risk areas' defined?	Sensitive flood risk areas are investigated in greater detail because of the need to be precise in the advice we give to the planning authorities. We select a list of locations that would benefit from detailed hydraulic modelling. These are then reduced to one or two locations for tendering purposes. The current level 'B' location that is being modelled is Cullompton, an area of major change in the Devon County Council Structure Plan.
Mr Rod Lawrence Faraway Wildlife Cullompton	Expansion of Marsh Barton Industrial Estate – The flood plain of the river is so important to wildlife conservation and the biodiversity of the area that it is very hard to understand how the recent and continuing expansion has been allowed. Surplus agricultural land could and should be used. Let us see no more destruction of this priceless area.	We have made several representations concerning development of this estate through the planning process and have been instrumental in obtaining mitigating measures including the creation of areas set aside for wildlife interests.

<p>Mr Noel Waine Secretary – East Devon Group The Council for the Protection of Rural England</p>	<p>We are pleased to note the contents of Issue 5, as the adverse effect of large-scale development on the countryside is one of our major concerns. The risk of flooding and damage to flood plains is a concept that members of the public recognise and draw to our attention when housing development is discussed. We hope that you will be able to influence the scale and location of any development arising from the County Structure Plan based on the Catchment Management Plan.</p>	<p>Noted.</p>
<p>Mr K Hill Tiverton</p>	<p>Tiverton Flood Plain – Washfield Weir/Bolham Weir/Head Weir are all breaking up. Lower Washfield Lane – drainage problems when heavy rain causing land slips. The Exe silting up badly.</p>	<p>We do not own any of the weirs in the area. Responsibility for structures and associated erosion problems lies with the landowner. Highway drainage is the responsibility of Devon County Council. We remove silt and gravel in places where the build up may cause flooding problems.</p>
<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>AVM calls are frequently received after the river has topped its banks. An improved service is needed, particularly on the Lower Exe.</p>	<p>We note your comment and have passed a copy of your letter to our regional colleagues, who are in the process of introducing a range of improvements to our flood warning system.</p>
<p>Mr J P C Shapter Exmouth</p>	<p>East Devon District Council not mentioned they sanctioned over development in Exmouth Dock area- saturation, despoiling of surrounding beaches. Development flood risk - why no barrier at slipway at Starcross by Ferry Jetty? Yet barrier at tunnel approx 100 m to the east.</p>	<p>The District Council is the planning authority and control development, as stated in our document, to which concerns should be addressed. The concerns are more appropriate for the Exe Estuary Management Plan. Comments have been forwarded to the Estuary Co-ordinator.</p>

Issue 6 IMPACT OF RECREATIONAL USE OF THE CATCHMENT		
Respondent	Summary of Comments	Agency Response
West Country Tourist Board Exeter	Whilst tourism is concentrated mainly in urban areas of the Exe catchment boundary, there are a high percentage of visitors that take part in some form of recreation whilst on holiday in the area, although this may not be their motivating factor.	Comments noted we will amend the Action Plan to reflect this point.
	It is widely recognised that the majority of the projected new housing is required to house local people that are a result of falling household numbers and are not new people to the area. The notion of increased recreation and leisure pressure should, therefore, not be a large issue, as for the main they will have established recreation habits and patterns.	Comment noted, however, although the majority of the projected new housing is required for falling household numbers, inward migration to Devon is difficult to predict and we cannot discount the fact that inward migration may contribute to an increase in recreational pressure. We will amend the Action Plan text.
	We support the proposal of the plan to increase the accessibility and incidence of ingress and egress points for canoeists in particular. It is recognised that the British Canoe Union commands much respect with regard to access agreements with riparian owners and in issuing codes of practice for its members. This good relationship needs to be maintained for the development of recreation access. In addition the West Country Tourist Board supports the broad policy to improve access and utilisation of flood defence areas where it is safe to do so.	We welcome your support.
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	The countryside is shrinking, the population increasing, but little has been done in the last 50 years to increase access. Your use of the term 'access route' assumes that the only form of access is linear. Linear access damages the environment whereas Open Access would protect the occurrence of erosion.	Noted. We support the principle of increasing access for the enjoyment of the countryside. However, universal unrestricted access could generate significant problems. Consideration of fragile natural habitats and co-operation with landowners are important.
	Walking – The Exe Valley Way is not a significant asset, it is a conglomeration of side roads and country lanes, which are not safe to walker or cyclist. It is not a footpath it is a cycle route.	We will highlight your concerns within the text of the Action Plan.

Mr Bryan C Linfoot continued	Cycling – What about the No 3, Sustrans route, the Millennium route? It travels through the upper reaches of the Exe catchment area to Tiverton and into Somerset.	There are a number of proposals within Devon. We have requested further information from Sustrans with a view to making additions to the Action Plan as appropriate.
Colonel J R Lewes Chairman Pynes Fishing Ltd	Canoeing - The River Exe above the City is NOT a NAVIGABLE RIVER. Only 40% of canoeists belong to BCU. RETA does not negotiate on behalf of all riparian and Fishery owners. It is counter productive to allow canoeing even from 1 st October to 13 th February which is the very time Salmon are cutting their Redds, laying eggs and breeding.	We concur that there are no navigable rights upstream of Exeter. We note your comments about RETA we will also list Fishing Association under Action 6b. Canoeing access arrangements are restricted to outside the fishing season to minimise conflicts with anglers. Canoeing is not considered damaging to spawning fish as it is generally undertaken at a time when flows are high and is not practised in prime spawning areas.
	Liability – proper consideration should be given to legal relationship between canoeists, landowners and those exercising fishing rights.	We do not support canoeing if it is outside negotiated access agreements or without riparian owner permission. Canoeists should take responsibility for their own safety.
	Are canoeists prepared to pay? All boats on the Thames have to pay an annual fee, why cannot the same principle be applied to the Exe and money used for its enhancement?	On the Thames payment is for navigational services, and therefore is not applicable to canoeists on the Exe.
	We are against giving any “Blanket” permission for recreational activities on our section.	Noted.
	Walking – we get enough trespassers already. Consideration should be given to safety and disturbance to both the wildlife and domestic farm animals particularly when dogs are allowed to swim and roam off the lead. Before people come into the countryside everyone must be educated to respect the residents, their property and way of life. Without the control of numbers the very things that people associate with the countryside will be damaged beyond repair.	We acknowledge that most Devon rivers lie within private ownership. It is very important that decisions on access to the countryside include co-operation from landowners and do not adversely affect the conservation value of the environment.
Mr T P B Hoggarth Deputy Director The Atlantic Salmon Trust Surrey	Clearly there is a requirement to maximise the recreational use of the catchment area. However, when encouraging the extension of canoeing activities and also opening up access to river walkways, due note must be made of the need to safeguard the habitat in order to protect and sustain fish stocks. It is recommended that local fishing interests are also represented on Actions b and c.	Your comments are noted and we will include ‘Fishing Associations’ within Actions 6b and 6c in the Action Plan.

<p>Mr Dennis Walls Secretary British Canoe Union South West Region Exeter</p>	<p>We are pleased that the importance of the Exe to canoeing is recognised by the inclusion of Adam Box on the Steering Group. We would hope you will continue to work with other organisations to optimise the recreational use of the water environment. We are concerned that recreational aspects of our rivers will be restricted in the future.</p>	<p>Noted.</p>
	<p>We hope the Agency will continue to act as a broker to bring interested parties together and assist in maintaining the existing agreements that are of great importance on a national scale. We agree that there are opportunities to extend the agreements to other periods of the year. We feel there are several options, the two main ones being the allocation of set dates on which the river might be "open" to paddlers, or some time zoning that would allow canoeing between certain hours. We would not necessarily expect this along the whole length of the rivers and would be prepared to discuss details. We would be very happy to consider a trial scheme and would handle working arrangements and publicity.</p>	<p>We note your comments with regard to access agreements and temporal zoning. It would be helpful if you could indicate specific reaches where you feel riparian owners might be sympathetic to such proposals.</p>
	<p>For many years canoeists have struggled with often inadequate and sometimes dangerous access and egress points. Improvements might be made to regularly used portages. We would also request that whenever changes and or repairs to the river bed or the banks are planned that the impact on canoeing is considered.</p>	<p>It would be useful if you would advise us of any particularly dangerous access and egress points of which you are aware.</p> <p>We are committed through legislation to ensure full consideration is given to the impacts on recreation from any works. It is rare for us to consent the construction of weirs at new locations, but we are involved with repairs to existing weirs. We ensure recreational activities are fully considered and where possible seek enhancements. We would be grateful to receive details of any weirs currently seen as problems to canoeists.</p>
	<p>We note in Issue 13 that work is planned at Beasley Weir. At present this weir is considered by most paddlers to be dangerous, and thereby inhibits what is otherwise a very interesting and varied paddle. Any work that can be included to make it more canoe friendly will be very welcome.</p>	<p>To date there has been no progress on these proposals, but we did met with the BCU Access Officer earlier this year to discuss and suggest measures to improve canoeing safety and access which could be incorporated within the scheme.</p>

Mr Dennis Walls Secretary British Canoe Union South West Region Exeter	We share the concern about Rivercall and the data available. We feel that the scheme has great merits but the information needs to be presented in an understandable and interpretable manner for the average paddler or group leader.	Improvements to the Rivercall system are currently being implemented and we would appreciate any further comments as these come on line.
	The Exwick Flood Scheme provides very limited availability for water based activity and there are better places within the City of Exeter. It may have limited use for beginners, unfortunately the shape of the channel and the design of the bridges further limits possibilities.	Noted, but we have nevertheless had some success with disabled water-based events within the scheme.
	The Trews Weir White Water Project new development is not included in your draft; both the BCU SW and Exeter Club see this as an exciting way forward for an all year facility.	The scheme has considerable potential although there are a number of difficulties to be overcome. We support the principle of such a venture and will include text in the Action Plan.
Mr A D Kilby Chairman The River Exe & Tributaries Ass	RETA is not just another Fishing Association. It is the representative body for the Owners of the River Exe, and its specific inclusions are considered justified.	Noted. RETA is included in several actions where appropriate.
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	Walking – we would be keen to be involved in habitat enhancements to the Alphin Brook and Exwick Flood Relief Channels. Cycling – Devon Wildlife Trust will be involved with the Sustrans plans along the Exe Estuary through the Exe Estuary Management Plan.	Noted.
Mr Russell Blackmore BCU Access Officer Taunton	It is refreshing that canoeing has been mentioned, and pleasing monies have been allocated. <ul style="list-style-type: none"> • I would look for a longer canoeing season on the Barle and Exe. • I would seek the Agency's help in reinstatement of the Barle access agreement. • I urge the Agency to allow canoeing all year round between the weirs at Tiverton. • I would ask the Agency to provide an egress point at Beasley Weir. • I also look to the Agency to provide meaningful river level information on the Internet. Technology has moved on from telephones, verbal information and 	We propose to hold a meeting with the BCU to discuss these issues.

Mr Russell Blackmore continued	figures which are not very understandable.	
Mr Richard Weaving Head of Countryside Management Teignbridge District Council	I welcome the content and action points under Issue 6. However, more detail might be useful in three areas. <ul style="list-style-type: none"> - voluntary access code for watercraft around Warren Point; - SW Coast Path 'Local Plan'; - Sustrans and other cycling routes 	We will amend the text of the Action Plan to reflect the additional points you raise.
Mr A J C Box Regional Access Officer British Canoe Union	We welcome that canoeing is recognised as a major recreational use of the river. We would like to see the Agency take a more pro-active role in setting up meetings to discuss issues and fulfil its duty to promote the use of water for recreation. We do not want or expect open access to the water but we would be pleased to see pre-arranged dates during the summer months when canoeing can take place.	It would be helpful to know whether you have any specific sites or times in mind, when referring to extending access periods. This would certainly be a starting point for discussion.
	There are less than six main access and egress points for canoeing along the length of the Exe; we would welcome any move by the Agency to improve the conditions of these sites. The installation of simple landing stages and steps, which could also be used by fishermen, would be of particular assistance to disabled paddlers and would not be expensive.	Similarly any suggestions for additional access and egress points would be a useful precursor to taking the matter further.
	There have been several instances in recent years where repairs to weirs have resulted in an increase in the danger to canoeists. We would hope that recreational use of the river would always be considered when weir repairs are being planned.	We always give full consideration to recreational interests when undertaking or licensing works in rivers.
	Rivercall promises to be a very useful service to canoeists but it needs to offer the information which canoeists require. We are aware of and grateful for the detailed negotiations into which the Agency has entered with many canoeing groups, and hope that the revised system will be more successful.	Noted.
	We note that no reference to the proposed whitewater canoeing course in Exeter is mentioned. This is now becoming a distinct possibility and feel that it should be referred to.	We will include reference to this scheme in the Action Plan. We also propose holding a meeting with the BCU to discuss and progress the issues raised.

<p>Mr Simon Bates Conservation Officer English Nature</p>	<p>We strongly support the action points e and g.</p>	<p>Thank you.</p>
<p>Mr Neil Edwards Executive Director The Inland Waterways Association</p>	<p>We support the need to fulfil the recreational potential of the catchment area. Increased access along the Exe Valley Way and the introduction of new and improved access points for canoeists are two such methods. Issues concerning boating have not been addressed. It should be also noted that increased boat use, within limits, could be beneficial by keeping weed down and scoring the canal.</p>	<p>Whilst we do not specifically mention boating in the context of canals, we are committed, in partnership with others, to support the development of Management Plans for both the Grand Western and Exeter Ship Canal. We will ensure that these plans are detailed, prescriptive and based on sound information, with wide consultation. The management plans will therefore encompass recreational activities and we, the Agency, will ensure that we fulfil our recreational duties in the development of these plans.</p>
<p>Mr Rod Lawrence Faraway Wildlife Cullompton</p>	<p>Dog Walking – Common Seals are rare animals in our area but have become regular visitors to the Exe Estuary for the past two years. The enormous increase of dog walking every day is a serious problem. It disturbs the seals off sandy areas and disturbs birds' feeding time. Dog owners need careful education.</p>	<p>The Exe Estuary Management Partnership has been established to resolve these types of conflicts, which are outside our control. We will pass on your comments to Richard Hill, the Exe Estuary Co-ordinator, who will be able to raise this issue through the focus groups which have been set up to address such issues.</p>
<p>Mr Carel Quaife Access & Development Manager BCU Nottingham</p>	<p>The Exe is an ideal river for an improved access agreement so as to cover paddling in the fishing season as well as the close season. Several hardly fished sections would provide ideal opportunities for family canoeing at summer levels; time zoning could be a way ahead on other stretches. The BCU can offer technical information on design of facilities. We have indicated that responsible canoeing is an environmentally friendly activity. We note the environmental concerns raised in the plan. It is most important that these concerns should not lead to restrictions on canoeing, unless there is scientific proof.</p>	<p>Regional and local representatives of the BCU have already highlighted many of the points you raise and we are taking appropriate action. We propose a meeting with the BCU to discuss these points in more detail. From the meeting we hope to develop appropriate actions where necessary.</p>

Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	Canoeing – The text does not state whether there is a right of navigation on the River Exe, and I do not believe the Agency can act as an ‘impartial mediator’. By virtue of its position regarding conservation, and its statutory duties to improve fisheries, and the riverine habitats. All recreational activities require maintenance and therefore a fee should be payable for all access (even walking and cycling etc), just as anglers pay a licence fee.	There is no right of navigation on the River Exe, except within its tidal reaches. We do not share your views regarding our ability to act as an impartial mediator. Our position on canoeing is stated in ‘Agreeing Access to Water for Canoeing’, which we enclose for your information. There are a number of access agreements currently in place within the Exe Catchment which have not interfered with salmon spawning. We do not agree that supporting canoeing contradicts our statutory objectives.
	Walking –If the Government allows open access to the countryside this will increase pressure on the environment, result in increased erosion, disturbance and litter etc. We should ensure that all existing rights of way are open and in good order before any funds are allocated to establishing new access.	In general we support the principle of increasing access for the enjoyment of the countryside. It is important that decisions on access include consideration of the impact on the environment. Where it can be achieved in co-operation with landowners significant benefits for people can result.
	Green Lanes – The Government is considering opening up access to ‘Green Lanes’ to 4 x 4 sport and other recreational vehicles. I am concerned that very little consultation has been undertaken in respect of this issue. What will be the Agency’s policy on this issue?	We do not have a national policy on Green Lanes. We are not aware of any proposals within the catchment that could cause us problems. Should issues arise in the future we will seek to resolve them within the confines of our duties and responsibilities.
Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter	In the current economic situation it is likely that any agreements for access to the river for canoeing and other activities will require payment. It is important that any proposals for additional walking routes are discussed at an early stage with the landowner and occupier and only implemented with their agreement.	Noted.
Mr J P C Shapter Exmouth	Cycling must not compromise ecological integrity, no tarmac paths ribboned along bank.	Noted.
Mr Jonathan Calderbank Development Manager Sport England – South West Region Crewkerne	The Exe is a locally important catchment for recreation, more so in the lower reaches and within the estuary. Sport England supports the proposed Actions to Issue 6. In addition you might wish to consider a proposal for a white-water canoe slalom course within Exeter City’s environs.	We welcome your support and note your comments regarding the proposed white-water slalom course in Exeter. We will include a reference to this within the forthcoming Action Plan.

Issue 7 UNKNOWN CAUSES OF WATER QUALITY NON-COMPLIANCE		
Respondent	Summary of Comments	Agency Response
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	No comment except how does this differ from Issue 2.	Issue 2 covers known impacts from the discharge of waste water (effluents) whilst Issue 7 covers failures of our water quality standards where the cause is unknown.
Issue 8 ADDRESSING CLIMATE CHANGE		
Respondent	Summary of Comments	Agency Response
Mr Richard Archer Conservation Officer RSPB Exeter	Sea-level rise - In our view, the statements that are included in the LEAP about the potential impacts of sea level rise are inadequate. We wish to see some evidence that the Agency is championing a strategic approach to habitat replacement in the Exe. We support the proposed actions for addressing climate change in the LEAP. However, intertidal habitat replacement must be promoted as a planned activity within a strategic flood defence strategy for the estuary.	We recognise the need for assessing the habitat loss/gain for sea-level rise. We will investigate with English Nature including an action within the LEAP to determine this loss/gain. We are looking at options for managed retreat within the estuary although the existing infrastructure of roads and railways makes this difficult. Managed realignment has usually been carried out either where landowners wish it to happen or where there are financial benefits. Capital schemes are subject to rigorous cost-benefit analysis.
	We are far from satisfied that the Agency is taking the issue of coastal squeeze on the Exe seriously. We are looking to the Agency to carry out an assessment of the likely habitat losses due to coastal squeeze in the Exe and to develop a strategic response to flood defence and habitat recreation.	There is scope for potential additional work here and a balance must be struck to ensure we work to protect the whole catchment and not necessarily concentrate all resources on the Exe Estuary. Forthcoming guidance from English Nature and publication of the Conservation Objectives for the Estuary will enable us to identify more clearly what actions we need to be developing. We are committed to a target of maintaining and increasing quality and extent of estuarine habitats.
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	We fully support the action table for this issue.	Support noted.
Mr Richard Weaving Head of Countryside Management Teignbridge District Council	Your draft plan confirms your continuing responsibility for flood defence, but this topic is less detailed than in the 1996 document. Could you clarify if this is because your policies are aligned with the Shoreline Management Plan?	You are right in assuming that our policy for coastal flood defence is included with the SMP. The LEAP document consequently has less detail on this matter.

Mr Richard Weaving Head of Countryside Management Teignbridge District Council	A brief confirmation of your approach towards defences on the seaward side of Dawlish Warren would be useful.	We are committed to monitoring the sea defences at Dawlish Warren and undertaking appropriate work 'to hold the line' on the seaward side of the Warren. This will involve consultation with you, English Nature and others and probably be the subject of an environmental assessment for significant works. We will mention this in the Action Plan. As stated in the plan on page 48 we have decided (through consultation) not to maintain the defences behind the Warren.
	The CMP referred to a pre-feasibility study at Powderham. Are there any further actions here that are worth reporting in the new LEAP?	Following the pre-feasibility study for Powderham Bank the recommendation indicated a scheme was viable. Consequently it now appears in our Flood Defence Medium Term Plan for 2005/6. In the intervening period bank maintenance will continue. We will add this information to the Action Plan.
Mr Simon Bates Conservation Officer English Nature	We strongly support the action points a and b and will work with the Agency to achieve them.	Thank you.
Mr Richard Hill Exe Estuary Co-ordinator Exeter	It would be useful to know why saltmarsh within the Estuary, apart from Dawlish Warren is considered to be able to keep pace with climate change. Surely all saltmarsh and reed beds are potentially at risk from 'coastal squeeze'.	Our comments were based on EA and EN R&D Technical Report W150, 'Implications of future Shoreline Management on Habitats' 1998. If you have other sources of information please let us know. We will add a statement to emphasize the importance of this area in our Action Plan.

Issue 9 DECLINE OF SPRING SALMON STOCKS		
Respondent	Summary of Comments	Agency Response
Colonel J R Lewes Chairman Pynes Fishing Ltd	Spring fish caught and released should be "marked" so if re-caught they are not counted twice.	Tagging is a useful technique, however consideration should be given to the effect on fish. We are considering a pilot tagging scheme on a south west river and if successful it could be extended to other rivers.
	The problem with catch and release is a political one and it may have been wiser to have a total ban until mid June.	Your comments with regard to catch and release are noted, however coarse fishing has always been operated on this basis and the high level of success with salmon would have deemed closure as over restrictive.
	I understand river water that is too clean or pure supports less aquatic life.	We are not in a position of having rivers that are too clean to limit salmonid productivity. The cleanest of Devon rivers are among the most productive.
Mr T P B Hoggarth Deputy Director The Atlantic Salmon Trust Surrey	It is recommended that the following actions are included; An investigation into salmon spawning targets leading to optimisation of the maximum carrying capacity of the Exe catchment.	This will be carried out as part of the Salmon Action Plan, and compliance with targets assessed on an annual basis.
	A programme of habitat improvement, especially in headwater areas.	We are currently working on a major habitat improvement project in conjunction with the River Exe Tributaries Association and South West Water Ltd. This will feature in the Action Plan.
	Identification of spawning sites and the regeneration, improvement and maintenance of redds.	Most of the important spawning areas are well known, and those that under perform can be targeted for improvements. We have recognised, in the LEAP, the need to identify areas in which spring fish spawn and give these locations priority for improvements.
	Pressing for the closure of mixed stock high seas drift net operations. Encouraging the Government to take the lead in developing an international research programme into the causes of the decline in numbers of adult salmon returning from the marine phase of their life cycle.	We are dealing with these issues nationally. The LEAP document is aimed at identifying problems that can be addressed at a local level.
Mr A D Kilby Chairman The River Exe & Tributaries Association	In the preamble, the reference to voluntary rod fishing measures to protect early running MSW Salmon to be attributed to RETA and to state 1996 as the year of introduction.	We will amend the text of the Action Plan to clarify the situation.

Mr A D Kilby Chairman The River Exe & Tributaries Association	In view of a recent stocking incident, the proposed inclusion in the preamble of the entire introductory third paragraph of the River Exe Action Plan 1996, concerning non-native fish species (particularly barbel and chub) is considered appropriate.	We will mention the concern re non-native fish species but, to keep the document manageable, we cannot repeat Agency policy word for word.
	The proposed inclusion of Action 15c (i) from the River Exe Action Plan 1996 together with Action 15c (ii) from its 1997 Annual Review concerning drift net fishing particularly in the estuary is considered essential.	We will include an additional action to consider the introduction of a byelaw to limit the extent of drifting for sea fish in the Exe Estuary to minimise illegal capture of migratory salmonids.
Mr Hugh Maund Chairman Exe Valley Fishery	Problem not fully understood. Annual checks of juvenile production needed. Installation of fish counter needed to establish numbers of adult fish migration and smolt descent.	Major electric fishing survey of juvenile salmonid stock is carried out every three years, and productivity is good for much of the catchment. The greatest concern is marine mortality. The need for a counter has been highlighted in the LEAP.
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	We support the actions proposed for tackling the fishery issues in the catchment, especially measures to tackle the problems with spring salmon.	Support noted.
Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	Changes in land use are probably the major factors impacting on the freshwater phase of the salmon's life cycle. Extreme low flows, higher water temperatures, greater siltation of spawning gravels all leads to poor natural spawning, low recruitment and habitat destruction. Therefore planning permission should be required for all changes in land use and the Agency should have the power to veto any application, which is deemed to be detrimental to the water environment.	We are only consultees for planning applications and cannot veto any detrimental application. The District Councils are the Planning Authorities.
	My concern is that the Salmon Action Plan is still at least two years away. Is there any way the SAP can be brought forward?	The Salmon Action Plan for the Exe cannot be brought forward, however, many of the actions are already in place within the LEAP.
	I believe the new measures introduced this season to protect early running fish will be of little help and are purely politically motivated. Catch and release is also robbing the Agency of valuable rod catch data.	Anglers are required to submit a record of fish that are caught and released on their rod licence return.

<p>Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire</p>	<p>Redd counting is used as a satisfactory indicator into the success of salmon spawning, however I understand that redds are not counted in the Exe Catchment.</p>	<p>We try to undertake a limited amount of redd counting when resources permit.</p>
	<p>Poaching – The focus here appears to be on collaborative arrangements and intelligence, however enforcement, prosecution and publicity still needs to be used as an adequate deterrent. The problem is how will all the salmon protection work be funded in the future with the continuing reduction in GIA.</p>	<p>Anti-poaching enforcement is still the single greatest area of expenditure in Devon. We prosecute and publicise successful prosecutions whenever possible. Declining funds from grant-in-aid causes us great concern also.</p>
	<p>Sea Trout – This fish is of major importance across the whole of the South West and although numbers of returning fish are very low in the Exe Catchment the fish could be very important in terms of recreation and to the local economy. Sea Trout appear to fall under the same issues as salmon and although I agree many issues affecting these two species are the same. The sea trout is a completely different species and should receive equal focus and priority within the action plan.</p>	<p>Noted, but the River Exe has never sustained an appreciable run of sea trout. Compared with other Devon and Cornwall rivers, it is unique in this respect.</p>

Issue 10 DECLINE IN BROWN TROUT POPULATIONS

Respondent	Summary of Comments	Agency Response
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	We support the actions proposed for tackling the fishery issues in the catchment, especially measures to tackle the problems with the decline of native brown trout.	Thank you.
Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	I could not find any mention of the forthcoming Agency 'Brown Trout Strategy'. There are many issues affecting the stocks of salmon, which also affect the native brown trout. Acidification which affects spawning and juvenile survival in many nursery streams. Genetic integrity of native stock should be maintained. However ongoing R&D may prove restrictions on stocking may need to be reviewed. To ensure accurate records are maintained in the future could not a catch return for non-migratory trout be mandatory?	We note our omission of a reference to the 'Brown Trout Strategy'. Acidification is mentioned elsewhere within the LEAP and is not considered an issue for the Exe fishery. We will consider the findings of the R&D and modify policy accordingly. The effects of stocking farmed brown trout go further than genetic integrity as they compete for food, habitat and predate on native juveniles. There are no requirements to make catch returns for non-migratory trout, however we will be encouraging clubs to collate annual catch data and providing them with return forms.
Mr Jonathan Calderbank Development Manager Sport England – South West Region Crewkerne	It is of great concern that many tributaries throughout England that once held larger brown trout populations no longer do so. Eutrophication, acidification and deposition of fine mud sediments over spawning grounds could be contributing factors.	Comments noted.

Issue 11 BARRIERS TO FISH MIGRATION		
Respondent	Summary of Comments	Agency Response
Mr Dennis Walls Secretary British Canoe Union South West Region Exeter	There are certain types of design of weirs that are particularly dangerous to the canoeist. Within the BCU there is a broad base of knowledge about weir design etc and we hope that the appropriate consultations will always take place. We note in Issue 11 that certain works to weirs to install fish passes are proposed and we would hope that where appropriate measures will be included to permit safe passage of canoes.	When designing fish passes, the Agency gives full consideration to the impact of pass installation on canoeing activity. Wherever possible, passes will be installed which permit canoe access.
Mr A D Kilby Chairman The River Exe & Tributaries Association	Since Action 16a (i) from the River Exe Action Plan 1996 in respect of Perry Weir is underway with RETA's involvement, its inclusion into the LEAP is considered appropriate.	We will include Perry Weir to Action 11a.
	Proposed specific addition of new action to LEAP to address storm flooding of fish farm rearing ponds is considered relevant.	Creation of bunds around ponds would constitute development in the flood plain, and is contrary to flood defence policy. In most cases there are no reasonable actions that could be taken to fully address this issue.
Mr Hugh Maund Chairman Exe Valley Fishery	Smolt entrapment - The plan did not make clear that Trout Farming Industry has formal agreement with you to have screens in place.	The formal agreement has now become a legal requirement to ensure that all fish farms have screening installed to the satisfaction of the Agency, this is mentioned in the plan.
Mr Ian Cook Exwick	Exwick Weir – need to mention improvement by 150 tons of rock/stone in 1997 repaired and stopped eastern side leakage.	This work was a flood defence measure and not undertaken to improve fish migration.
Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	I fully support the policy of increasing access to migratory fish and the building of fish passes, but we must ensure that the impact on the resident species above the obstruction is fully assessed.	We agree ensuring that the impact on resident species above the obstruction is fully assessed, and that habitat is suitable for the target species.

Issue 12 FISH-EATING BIRDS		
Respondent	Summary of Comments	Agency Response
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	We are totally against culling of indigenous wildlife for any reason or excuse.	Noted.
Mr T P B Hoggarth Deputy Director The Atlantic Salmon Trust Surrey	Adoption of the precautionary approach to avian predation is recommended now. Of particular concern is the damage caused by cormorants to juvenile stocks.	Although cormorants may be taking juvenile salmonids it cannot be concluded that there is a detrimental impact on the fishery. This is one of the questions that the three-year study has attempted to answer. We are committed to implementing appropriate recommendations arising from this study.
Mr Dennis Walls Secretary British Canoe Union South West Region Exeter	Although not directly on our agenda we have great sympathy for coarse fishing interests who are suffering losses from their waters. There is undoubtedly an increase in the number of these birds at inland sites.	We are committed to implementing appropriate recommendations arising from the three-year study.
Mr Hugh Maund Chairman Exe Valley Fishery	As a salmonid river, the Exe was at its peak in the 1920s when cormorant and heron numbers were controlled and goosanders did not exist this far south. The vast increases in bird numbers have some effect on salmon. Essential to allow control not decimation of birds.	Recent research showed inconclusive effect of cormorants on riverine salmonid stock. The MAFF will be considering if current licensing policy needs to be revised.
Mr John Wokersien Town Clerk Exmouth Town Council	We support actions to reverse the decline of fish stocks and support the cautious approach being taken by you to license killing of fish-eating birds.	Noted thank you.
Mr Richard Archer Conservation Officer RSPB Exeter	We support the Agency's approach to this issue.	Thank you.
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	We support the position taken by the EA and the proposed action on this issue.	Thank you.
Mr Paul Marks Devon Area Fisheries Forum Member Exeter	An excellent Exe consultation draft. I comment on behalf of all local coarse anglers regarding the predation by cormorants on our Exeter canal fishery. The Agency really has to make a stand and support the culling of the birds despite the total opposition by the RSPB.	Thank you. Following the publication of the R & D findings the Agency will be consulting its Fisheries, Ecology and Recreation Advisory Committees early in the new year, but overall, the results confirm that there is no immediate need for the Agency to change its stated position.

<p>Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire</p>	<p>There are absolutely no grounds for cormorants to remain on the protected list inland or above the tidal limit. In addition the situation with regards to goosanders may also need to be reviewed now that the three-year report into fish eating bird predation has been published.</p>	<p>Noted.</p>
<p>Mrs Sally Harradine clerk Lympstone Parish Council Lympstone</p>	<p>Members would like to support the document and comments made by Exmouth Town Council. The Parish Council was very clear in its opposition to any killing of wild birds on the Exe.</p>	<p>We thank you for your support for the document and note the members' opposition to any killing of wild birds on the Exe.</p>

Issue 13 INCREASING DEMAND FOR WATER RESOURCES		
Respondent	Summary of Comments	Agency Response
West Country Tourist Board Exeter	It may be worth considering the fact that many farm properties also cater for tourists and their water use volume will be affected by this diversification.	In assessing future demands for water a wide range of factors are taken into account including individuals consumption, occupancy rates of different properties, and economic activity. Forecasts within plans take these points into account but not specifically farm households. Establishing occupancy rates and periods when applicable for tourists can be difficult, but we aim to improve how this is calculated in water resources plans in future years.
	We support the 'Green Audit Kit' document which promotes water saving devices. Water saving ideas and devices are outlined as being a quick and easy way to be more efficient.	We welcome your support and understand South West Water Ltd offer free seminars on water efficiency to tourist businesses. We are also happy to provide 'Conserving Water in Buildings' fact cards.
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	Water abstraction – we cannot keep on taking water from underground sources without jeopardising our and our children's future. The water table will drop and we will have to water crops compounding the problem. A completely new approach to the whole water rainfall and water usage needs to be devised. What about greywater? Our system of using a gallon of water or more in a toilet to dispose of less than a pint of liquid waste is bordering on lunacy.	Underground sources contribute a relatively small proportion of the water abstracted for public water supply within the Exe Catchment with much of this water returned to the river system as treated effluent. In determining applications to abstract water we strive to balance the needs of the environment with the needs of the abstractors. We promote water conservation and work with the water companies to plan for future demands currently until the year 2025. Greywater recycling is mentioned on page 35 and new Water Regulations (July 1999) state new toilets must use a 6 litre flush rather than the current 7.5 litre flush, giving a 20% saving.
Mr Hugh Maund Chairman Exe Valley Fishery	The trout farming industry can only exist if it can continue to abstract water for its operations. To alter a licence volume could render any capital expenditure superfluous or at worst put a farm out of business by limiting production to a non-viable level. Future plans must be fully discussed and compensation paid.	Through its paper 'Taking Water Responsibly' the Government expects the Agency to review damaging abstractions but recognises a balance will have to be struck with the needs of the licence holder. Overall we are expected to work with abstractors in developing long-term solutions.

<p>Mr W J Elliott Torquay</p>	<p>Five years ago when I was a Devon County Councillor the comment I used to make was to help Roadford Reservoir. This seemed to lack resources yet there was a surplus in the Exe Estuary at certain times due to flooding. It seemed some kind of transfer was required.</p>	<p>Water is transferred from the River Exe to aid the supply to North Devon as part of the Roadford Reservoir scheme. Water is licensed from Exebridge into the Exe/Taw transfer pipeline, for subsequent abstraction from the River Taw at Newbridge. South West Water Ltd can winter pump water from Exebridge back to Wimbleball Reservoir to help water resources in Devon, as mentioned on page 34 of this draft.</p>
<p>Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire</p>	<p>Spray Irrigation – Winter storage must be promoted more widely and mandatory best practice for spray irrigation introduced.</p>	<p>We do advocate winter storage for irrigation, generally it is our preferred option, although each scheme has to be assessed on its merits.</p>
<p>Mr K Hill Tiverton</p>	<p>River Flows – there are not enough gauging station of the Exe.</p> <p>Bolham should have a gauging station as there's far too much water being taken out of the river by SWW's pumping station.</p>	<p>Our network of stations has been developed over many years. The aim is to have sufficient coverage to provide river flow data for our work and assessment of water resources available in the catchment. We have many stations so cannot easily justify any new ones.</p> <p>Water is released from Wimbleball Reservoir at times of low river flows. Licence conditions for SWW's abstraction at Bolham require that the water released supports this abstraction from the river when the natural flow is below a prescribed rate. Compliance with these conditions is checked by site visits and analysis of SWW's daily return figures for abstraction at Bolham and releases from Wimbleball.</p>
<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>For farmers who irrigate an adequate supply of water is essential to meet the quality demands imposed by purchasers.</p> <p>It is essential that the Environment Agency is involved in detail on Structure and Local Plan matters to ensure there are adequate resources for proposed new development.</p>	<p>The proposed Catchment Abstraction Management Strategies will explicitly include and encourage relevant parties' efforts and contributions to balance future water needs with the environment.</p>
<p>Mr David Boyce Ecologist Exmoor National Park Authority Dulverton</p>	<p>Under European Regulation 50 of the Conservation (Natural Habitats) Regulations 1994 will also require review of extant permissions on the Exmoor Heaths cSAC.</p>	<p>Noted. The East Devon Pebblebeds have been identified as a priority for review of permissions. A review of permissions for the Exmoor Heaths cSAC will follow.</p>

Issue 14 IMPROVING AIR QUALITY		
Respondent	Summary of Comments	Agency Response
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	Agreed in general terms, but there are two other types of pollution you have ignored – light and sound.	These pollutions are not within the remit of the Agency; they are issues for the local authority.
Mr Simon Bates Conservation Officer English Nature	Action point a: 'key' or 'indicator' species might be better than 'declining'. Additional Action: produce a <u>sustainable</u> monitoring strategy, lead by ENPA or EN, with input from EA?	We are awaiting copies of the draft Exmoor BAP and suggest that we review this issue once we have all had an opportunity to study the Exmoor BAP. It is likely that Exmoor National Park Authority will take the lead in developing the way forward. We will then make appropriate amendment to the LEAP Action Plan.
Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	Acidification – I am please to see the matter receives such a high profile within the LEAP. Liming watercourses to ameliorate the effects of acidification can only be a short-term measure.	In other upland areas of the UK acid deposition has undoubtedly resulted in severe environmental impacts, and in some areas liming has been used to ameliorate these effects, although it is not without its own problems. On Exmoor although critical loads are exceeded, there is no evidence of actual environmental impacts resulting from it, more information is needed to assess if any actual impacts are occurring.
Mr David Boyce Ecologist Exmoor National Park Authority Dulverton	ENPA is identified as a partner in the implementation of actions (a), (b), (c) and (d). Probably the single most important nature conservation issue on Exmoor would be the protection of the epiphytic lichen communities that occur in our upland oakwoods and parklands. I would say that the setting up of a programme of monitoring would be a key action if we are going to address this issue. I also note that action (b) is timetabled to be addressed by 2000. What do we need to do to progress this action?	We suggest that we include an action to 'investigate the impact of air pollution and woodland management on lichen communities on Exmoor'
	Table 3 – Need to add reed bunting species for spring-line mire and rhôs pasture. Add air pollution as additional threat to lichens of wet woodland. Add heath fritillary to species list of lowland heathland.	We will correct our omissions from Table 3 for the Action Plan.
	15f – ENPA are also involved in the control of knotweed on the Barle.	Noted, we apologise for the omission of ENPA concerning Japanese knotweed control on the Barle and will amend the text for the Action Plan as you suggest.

Mr David Boyce Ecologist Exmoor National Park Authority Dulverton	Action (j) for 15f and 15i both should identify ENPA as a partner, given that the action is concerned with the implementation of the Exmoor BAP.	Noted, we will amend the text for the Action Plan and include ENPA as a partner for these actions.
Issue 15 ENHANCING BIODIVERSITY		
Respondent	Summary of Comments	Agency Response
Ms Barbara Benfield Devon County Lichen Recorder	River Jelly Lichen, <i>Collema dichotomum</i> was found in the Barle between New Bridge and Brushford Bridge. It was not found south of Tiverton, but was found by the Exbridge Waterworks and Oakfordbridge. It is very encouraging to find this pollution sensitive lichen growing in the river Barle and Exe.	Thank you for drawing our attention to some additional sites, we will add these to our database. We need to gain as full a picture as possible of the status of the species distribution in the West Country.
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	The key to maintaining wildlife habitats is not draining them by extraction of water by whatever means or 'improving' them.	Abstraction of water is subject to controls via abstraction licences, and we can impose conditions to protect wildlife habitats. The government is currently reviewing wildlife legislation, which we welcome.
Mr A J Page Head of Policy & Heritage Teignbridge District Council Newton Abbot	Reference to Alder root disease is welcomed. This disease could, potentially, decimate the Alder population in the area that would have major consequences for the landscape and river bank erosion. I consider there is a need for a more expansive and proactive role to be taken by the Agency in addressing this issue than is currently proposed. In my view there is a need for annual surveys and replanting programmes (of other species if current field trials indicate a lack of disease resistant alder strains).	We promote the establishment of riparian buffer strips. We mention the problem on page 14 under 'regeneration of bankside trees', and we will add an action in the Action Plan. Buffer strips can be an effective way to re-establish Alder from natural seedbank and develop disease resistant individuals. Whilst we pursue a keen interest the Forestry Commission is undertaking detailed research into the disease and takes the lead in the collection of information on the extent and physiology of the disease. We pass information of disease occurrence directly to the Commission. We work to encourage tree management along watercourses in addition to the establishment of woodland see Action 15b(i).
Mr A D Kilby Chairman The River Exe & Tributaries Association	RETA is not just another Fishing Association. It is the representative body for the Owners of the River Exe, and its specific inclusions are considered justified.	Agreed. RETA are included as partners in several biodiversity actions where appropriate.

Mr David Hogan Royal Holloway Institute for Environmental Research	The length of this section rather unbalances the document.	Biodiversity within the Exe catchment is relatively rich and therefore the text is extensive, but we will review the text for the Action Plan.
	Blanket bog – poor burning as a threat suggests there is a good burning practice. Bogs should not be burnt at all.	Light swift burning over bogs can be beneficial in removing species such as <i>Molinia</i> .
	Wet woodland – most are in areas of high groundwater and seepage with gley soils, which are loamy rather than heavy (clayey). The combination of heavy soil and high rainfall gives Cwm grassland. Diptera are hoverflies. Neglect can increase the amount of wet woodland as some occupies abandoned former enclosures in bottomland.	We do not wish to increase the text of the document unless absolutely necessary, but your comments are noted and will remove 'neglect' as a contributory factor to decline.
Mr John Wokersien Town Clerk Exmouth Town Council	The document should make reference to the designation of the national special site of interest to the RAMSAR designation within the Exe estuary.	We refer to the Exe Estuary being a SPA, Ramsar and SSSI throughout the document. We will consider cross-referencing the information.
	The position of the docks as a gateway to the river should be referred to in the report.	We mention that the significance of Exmouth docks and detailed recreational activities within the Exe Estuary are dealt with in the Exe Estuary Management Plan.
	Can reference be made to the ownership of the land under the water of the estuary with particular reference to how far Crown agent's ownership is involved?	These matters are better dealt with within the Exe Estuary Management Plan, which we support and do not wish to duplicate the information.
Mr John Hayward Devon Biodiversity Project Officer Devon Wildlife Trust Exeter	15b Wet Woodland – it might be useful to include more detail on new wet woodland creation and joint project with Forestry Commission.	Noted we will revise the text to include the Forestry Commission as a potential partner.
	15d Spring-line mire and Rhôs pasture – I assume that the East Devon southern damselfly populations are outside the area. If not perhaps should be mentioned here. Devon Bird Watching and Preservation Society is Champion for curlew. The Barn Owl Trust is Champion for barn owl and would probably be keen to contribute to any work.	Our information indicates that they are outside this catchment. We will include DBWPS and BOT as potential partners.

Mr John Hayward Devon Biodiversity Project Officer Devon Wildlife Trust Exeter	15f Rivers, streams, floodplains and fluvial processes –the target to restore 10 ha of flood plain by 2005 could usefully be cross-referenced with 15b. Consideration of the potential for decreasing the connectivity of drainage systems to headwater channels by blocking drains where appropriate, to attain wetland habitat restoration: action B8 in the Rivers' HAP in the Devon BAP.	Your suggestion for cross-referencing will be actioned. Noted.
	15l Reedbed – the supply of figures for potential areas of new reedbed in the catchment would be good. DBWPS may contribute to this as Champions and have valuable experience from other work in Devon.	We are currently working to develop specific targets for a number of LEAP areas including the Exe, and will endeavour to link these closely with the Devon BAP.
	Overall the LEAP seems to take Devon biodiversity targets well into account and I look forward to seeing new projects develop from it.	Thank you for your positive comment.
Mr Aidan Winder Devon County Council	15f – The County Council is happy to support the proposed action relating to water voles. We are already heavily involved in water vole survey work on the Canal.	Support noted.
	15h – It is unfair to suggest that management works are merely reactive. The County Council works to past published management plans and associated documents, which will be reviewed and incorporated within the future management plan. However availability of resources dictates the degree of implementation.	We note your comments but have expressed our particular concerns on the dredging work with the GW Canal Manager. We will revise the text for the Action Plan. We still maintain that a strategic approach is urgently required for the Exeter Canal.
	15i- The archaeological value has been omitted. There is a high degree of archaeological monuments, such as prehistoric burial mounds (barrows/tumuli), prehistoric and medieval field systems, etc.	Noted. We will broaden the text in the Action Plan.
	15m – The link with the Exe Estuary Management Plan is properly made. However Policy 12 and 13 should also be included. EEMP Action Points 25 to 28 cover these areas.	Noted we will incorporate these suggestions into the text of the Action Plan.
Mr G F Poad Chief Planning & Technical Officer East Devon District Council	The Council is supportive of the aims and proposed actions, but timescale and budgeting implications need consideration before specific commitments are made.	Noted.

<p>Mr G F Poad Chief Planning & Technical Officer East Devon District Council</p>	<p>We are a funding partner on the Exe Estuary Partnership and are carrying out an ecological survey on the Exmouth Local Nature Reserve which will lead to the publication of a management plan for the Reserve. We are in discussion regarding projects on the River Clyst. We also provide grants for environmental improvements and would welcome ideas for projects from you.</p>	<p>We are aware of the Exmouth Local Nature Reserve and welcome the publication of the management plan. Local Nature Reserves are not mentioned within the LEAP as there are no issues relating directly to them. We note your comments regarding grants and look forward to our continued involvement with you on such projects in the future.</p>
<p>Mr Richard Archer Conservation Officer RSPB Exeter</p>	<p>Floodplains – The target to restore 10 ha of floodplain by 2005 is modest, and does not take into account the many other benefits which could accrue through a strategic and integrated floodplain management strategy.</p>	<p>We consider that target size is less relevant than the existence of a target. Our stated target will, importantly, enable us to measure success or failure.</p>
	<p>Grazing marsh – We support the proposed target for grazing marsh, although the recreation/enhancement of a further 25% by 2005 is likely to require considerably more than £16,000. There are some obvious opportunities which should be explored, including our own land at Goosemoor, and land further up the Clyst.</p>	<p>We are working with partners to look at habitat replacement (eg Clyst Marshes and Goosemoor).</p>
<p>Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter</p>	<p>This is an excellent and very good reflection of the work done on including biodiversity issues some time ago. We appreciate the amount of work put into this section to make is so thorough.</p>	<p>Thank you for your enthusiastic support for this issue, we have had some comments regarding the length of this section, but feel that it is justified as it represents the enormous diversity of wildlife in the catchment.</p>
	<p>We support the comments made by John Hayward, Devon Biodiversity Officer, and would add: 15p Coastal Reefs – The reference Munro, D should read Monro, C. A working group of interested parties (DWT etc) should also include 'local fishing industry'.</p>	<p>The incorrect reference is noted. We believe it is actually C D Munro. We will also include local fishing industry within the interested parties.</p>
	<p>We would encourage funding for actions to be implemented within the time frames suggested, so that the Devon BAP is supported as a contribution to national and local BAPs.</p>	<p>Noted.</p>
<p>Mr Ian Cook Exwick</p>	<p>Exe and Creedy at Cowley presence of freshwater mussels and crayfish. Need to be monitored and protected.</p>	<p>We would be interested to know where and how recently crayfish were seen. Exact dates and grid references would be helpful. Swan mussel is fairly common, but we would like to receive any exact records of freshwater pearl mussel.</p>

Mr Ian Cook Exwick	Weircliffe – I have witnessed spawning of sea lampreys. Presence in Exe/Creedy should be recorded.	Thank you. We are aware of them spawning within the Exe, but lack detailed knowledge of the distribution of all three species throughout the catchment.
	Water Vole – predation by mink has virtually wiped out the population.	We agree that mink have been a major factor in the decline of the water vole, although loss of habitat is also an important factor.
Mr Richard Weaving Head of Countryside Management Teignbridge District Council	I was impressed by the amount of detail given in this long section.	Thank you.
	I note the reference to the production of CWS Inventories. The Agency helped with our survey in 1994, but it needs updating. Could you include an action that reinforces your existing statement?	We have action 15(i) on page 39 to support updating of wildlife inventories, but appreciate that it may appear hidden within the document. We will revisit this text for the Action Plan.
	We realise that we must develop local district BAPs. Any financial support would be greatly appreciated.	With regard to a local/district BAP no funds are available at the moment.
	15b Wet Woodland – I note your intended action on potential sites for a millennium forest. Do you wish any such forest to be a wet one?	We would certainly support any opportunity for a creation of this habitat as part of the millennium forest initiative or any other woodland creation proposals.
	15k Grazing Marsh, 15m Estuary Habitats – the EEMP is keen to promote wetland enhancement on the flanks of the Estuary. Could the text and the action point at 15k or 15m reflect this a little more fully?	We believe our intentions for habitat restoration along the Exe Estuary margins are clearly stated within 15k, although not specifically mentioned in section 15m. We will clarify that opportunities for habitat creation along the estuary are not restricted to grazing marsh within section 15k.
	The general commitment to the integration of LEAP/EEMP policies is to be welcomed. At present Teignbridge Council has a serious budgetary shortfall for this year and for next. Could the Agency help with core and project funding?	We also have a budget shortfall and cannot continue to fund the Estuary Project. We are seeking other methods and have supported the recent INTERREG II funding bid made by DCC for the Exe and Teign Estuaries.
	15n Sand Dunes – I note and welcome action 15n (i) and (ii) for the hydrology project at Dawlish Warren. Support in analysing water level data recorded would be very valuable too.	Our Project Officer will discuss this matter with you to see what help we could give with analysis and interpretation.
	Dawlish Warren LNR- could you reflect your support for the emerging Dawlish Warren LNR Management Plan within the LEAP?	We will include an action to support the development and implementation of the Dawlish Warren LNR Management Plan.

The Exmoor Society Dulverton	We note the Agency's commitment to deliver improvements to the land, air and water environment. Its acknowledgement of the importance of the catchment for wildlife and nature conservation is reassuring, and the mention of several very special Exmoor habitats gives us hope that the designations of these areas will be respected in any future plans.	Noted. Thank you.
Mr Simon Bates Conservation Officer English Nature	Reference should be made to the 'Dartmoor Hydrology Project'.	Noted, we will amend the text for the Action Plan.
	15f - You should add <i>Hydrocotyle ranunculoides</i> (a pennywort) to the section on invasive species. It has recently been found in the Exminster Marshes and is a large threat to the ditch flora and fauna.	We will include this species within the list of invasive aquatics, and we will add Exminster Marshes to areas requiring control.
	15k – It is absolutely essential that the first action in this section is for the production of an agreed Water Level Management Plan for Exminster Marshes. It doesn't exist at present! The Agency must put more resources into monitoring the ditch water levels and flood events on the marshes. This is absolutely essential to check wither the objectives in the WLMP are being achieved. The figure of £15,00 under action (i) is not enough. We strongly support points (ii) and (iii) but the Agency should commit money to the latter. The Agency only own one area of land on the marshes and it ought to be possible to cost an enhancement scheme out and commit to it.	Noted. We will amend the Action Plan. However, we do have telemetry equipment at two sites (Swans Nest and Swingbridge) which continuously monitor water levels fulfilling the monitoring requirements of the WLMP as previously agreed. We have recently received guidance documentation from MAFF with regard to water level management plans and in the light of this will review the situation.
Mr Neil Edwards Executive Director The Inland Waterways Association	15h Canals – We are pleased that the Agency recognises the recreational importance of canals. The IWA supports the enhancement of biodiversity provided that it is not at the expense of boating and waterside interests.	Noted.
Mr Rod Lawrence Faraway Wildlife Cullompton	Exotic plants – It saddens me very much to see the establishment of many species in the Exe valley and no attempts at control. Dawlish Warren is a classic example where a few clumps of Michaelmas Daisy have now destroyed the whole of Greenland Lake.	Your concern about the Michaelmas Daisy on Dawlish Warren is noted. The warden at the Warren is aware of the problem and has tried a number of physical and chemical control techniques with varying levels of success. Advice is currently being sought from English Nature and we hope this will lead to an effective method of control.

Mr Rod Lawrence Faraway Wildlife Cullompton	Another exotic is Winter Heliotrope which is taking over huge areas and wiping out our native flora. Control should be immediately implemented. There are huge areas of this plant on Exminster Marshes.	We would be grateful for any information you hold on the distribution of these species within the marshes. We are concentrating our efforts on the control of aquatic submerged, emergent, floating and marginal invasive plant species. We will ensure that any information regarding this species will be investigated and we will encourage control as appropriate.
Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	Disease of Alder Trees – As the alder is one of the dominant species along the Exe and tributaries <i>Phytophthora</i> could have drastic detrimental effects. Therefore the extent of the disease and its potential impact within the LEAP area must be established as a matter of some urgency, together with a strategy to ameliorate its impact.	We will be making amendments to the text as we receive updates from the Forestry Commission, who have taken the lead in researching this disease. We are concerned about the potential impacts the disease will have and will draw attention to the mitigation proposals that we are either undertaking or encouraging others to take.
Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter	15b Wet Woodland – Many farmers will be happy to be involved with issues such as this, providing there is appropriate funding. Although the cost to the Agency is listed, there is no indication as to how such improvements will be funded. 15f River, streams and fluvial processes – Again, all worthy actions but where is the money coming from?	As our funding is uncertain from year to year, we cannot identify funding for all the actions. As the plan is implemented we will seek funds for many of the actions, from sources both within and outside the Agency.
	15j Lowland farming – We support the encouragement of more resources to be directed into agri-environment schemes. The main scheme, Countryside Stewardship, is woefully under-funded.	Noted.
Mr Colin Shawyer The Hawk & Owl Trust Herts	The installation of boxes for Barn Owls and Kestrels on some parts of the catchment would undoubtedly complement the Trust's already established partnership schemes in Somerset. It would also provide important nesting opportunities for those young that disperse from existing sites.	We have included an action for Barn Owls, under Spring-line Mire and Rhôs Pasture (15d (iii) page 42). We will add the Hawk and Owl Trust as a potential partnership body, and welcome your support. We welcome suggestions for specific projects.
Mr David Boyce Ecologist Exmoor National Park Authority Dulverton	We will shortly be sending the Agency a copy of the draft Exmoor BAP for your comments. Many of the actions in this tie in closely with those outlined in the Exe LEAP.	Thank you we will refer to your document in the Action Plan.
Mr Tony Ellis Consultant: Planning & Environment Royal Yachting Association	15h – The decline in water vole is a concern to all. British Waterways have been involved in making provision for voles when installing bank piling.	Noted.

Issue 16 LACK OF INFORMATION ON CATCHMENT RESOURCES		
Respondent	Summary of Comments	Agency Response
Mr Hugh Maund Chairman Exe Valley Fishery	We know that salmon numbers are in serious decline, but there is no certainty as to the cause, so the installation of a fish counter is vital.	Noted.
Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire	Under this issue I would like to restate the comments concerning redd counts and rod catch returns as methods of establishing population densities.	Noted.
Mr Jonathan Calderbank Development Manager Sport England – South West Region Crewkerne	We believe that the author of the Plan has a good grasp of the key issues affecting the Exe catchment. Consideration might be given to amalgamating one or two issues. For example, Issue 16 could be drawn into Issue 9 or 11.	We will review this matter for the Action Plan.

ADDITIONAL COMMENTS AND PROPOSED ACTIONS		
Respondent	Summary of Comments	Agency Response
Ms Lisa Henry West Country Tourist Board Exeter	The Board supports and commends the joined-up thinking approach towards the existence of other plans that also cover the geographical area of the Exe catchment.	Noted thank you.
Mr Chris Marrow Forest Enterprise Peninsula Forest District Kennford	Land Use – p7 please amend Forestry Authority to read Forestry Commission	Noted and amendment made.
Mr Harvey Wood Clean Rivers Trust Newark, Nottinghamshire	Thank you for the consultation LEAP for the Exe catchment. I have read it with interest and found it a well put together document. I know the river well and am unable to add any additional information or disagree with any point.	Thank you.
Professor J Hilton Institute of Freshwater Ecology Wareham	Having read the report I found it to cover all the necessary areas and is well put together.	Thank you.
A Hall Pinhoe, Exeter	The development of riverside environment is long over due in the Exe tributary Pinbrook. A footpath and wooded area all the way up to source would achieve much.	Due to our limited resources the Pinbrook has not been identified as an area of priority, however we may be able to advise and support a community led initiative.
Mr Bryan C Linfoot Hon Countryside Secretary The Ramblers' Association	There are no user groups proposed for the Steering Group. Why not, you talk about Access but you don't involve the people that have the expertise.	We will be looking closely at public participation and LEAPs during 2000 and considering how to actively involve a wider section of the community in the LEAPs process.
Mr A J Page Head of Policy & Heritage Teignbridge District Council Newton Abbot	Aims: While the Agency's role and that of the LPA's are defined later in the document I fear there is scope of confusion among the public as to responsibilities. There is an expectation of delivery of the actions. If this is not the case some other statement that more accurately describes the likelihood of action needs to be incorporated into the preamble.	The second aim within the document will be amended in the Action Plan to read 'to encourage the conservation of natural resources, animals and plants' as stated in our Environmental Strategy. We will add new text under section 1.2 to clarify the position with regard to funding of the actions.

Mr A J Page Head of Policy & Heritage Teignbridge District Council Newton Abbot	<p>If you consider that reference is merited to listed buildings and historic parks and gardens (2.4), conservation areas should also be afforded a mention. To be more meaningful, I consider that reference ought to be limited to 'watery' sites with actions proposed to safeguard important sites, buildings and features.</p> <p>While Local Plans are mentioned in Issue 5, they are of such significance to the LEAP process that they warrant a mention in Chapter 2.</p>	<p>Your comments are noted with regard to district built conservation areas and will ensure references to such areas will be made in the Action Plan. However, our conservation duties are not restricted to wetland areas.</p> <p>With regard to statutory plans a new paragraph will be written for inclusion into Chapter 2 of the Action Plan.</p>
	<p>I note your desire to take an active role in the local plan process. I'm uncertain whether the LEAP fulfils its potential in presenting a truly holistic view of the Agency's future intentions. However, a 'one stop' document possibly with South West Water's input would be of great value in providing help and guidance to local planners.</p>	<p>A national group is currently examining how future LEAPs will be developed. Your suggestions have been forwarded to this group.</p>
Mr Ken Buswell Conservator – The West Country Forestry Commission Exeter	<p>Our Woodlands are all owned by the Forestry Commission (and managed by the FE) so the last line of the paragraph will need correcting.</p>	<p>We will amend the Forestry paragraph on page 7 to read Forestry Commission in the Action Plan.</p>
	<p>In the last sentence it would be more correct to state that the UK Forestry Standard is the nationally agreed code of standards for all management and operational practices.</p>	<p>We will amend the Action Plan.</p>
	<p>I would also comment that as the Exe has a considerable range of woodland a map showing the woodland would be useful. Earlier LEAPs used to include them.</p>	<p>The focus of our LEAPs has changed significantly over the last two years. The documents are now more focused on producing actions on the ground, than on describing the catchment in detail. As a result of this we are only showing sites which are raised as issues in the report on our maps.</p>

<p>Mr Michael W Tyler Environmental Consultant Morchard Bishop</p>	<p>I was impressed with the document, which is a marked improvement on the former catchment management plan. With the publication of the Devon BAP you are now able to concentrate on specific areas that apply to the Agency's statutory role as opposed to being drawn in on irrelevant matters. The Agency appears to have identified problem areas from the past and hopefully those anticipated and have produced suggested actions of which I fully agree with.</p>	<p>Thank you.</p>
<p>Mr David Hogan Royal Holloway Institute for Environmental Research</p>	<p>Maps – there is detail on the geology map of which not all relevant to the issues of the catchment. The key is out of chronological order and the colour appears wrong.</p>	<p>We will review the presentation of the geology map in the Action Plan.</p>
	<p>2.2 Physical Features – The catchment description could usefully relate to the natural areas. Geology – No mention of the important Quaternary units. Hydrogeology – Final paragraph should go elsewhere. Soils – this needs to relate more closely to geology (a map would help). Given the importance of soils, this section is very short.</p> <p>Suggestion of re-wording included.</p>	<p>We will review this section and amend the text for the Action Plan. A sentence will be inserted on the Quaternary period. We will move it to the wildlife 2.3 section. We do not currently have the resources or expertise to cover soils in detail. We have forwarded your comments to the national group who is currently looking at future LEAPs.</p> <p>We will amend the text of the Action Plan.</p>
	<p>Section 3 – When is chemical quality monitored and where? What are the parameters such as discharge, season (affects land use impacts) etc?</p>	<p>Chemical quality is assessed annually, and biological quality is assessed every five years under the General Quality Assessment Scheme (GQA). The GQA chemical assessment uses all routine chemical samples taken over a three-year period. For example the GQA assessment for 1998 would be based on the data from 1 January 1996 to 31 December 1998, typically thirty-six samples. There are hundreds of GQA monitoring points on rivers in Devon and each year the sites are reviewed to keep the data as representative as possible.</p> <p>The parameters monitored for GQA assessment purposes are BOD, total ammonia and DO. The GQA scheme provides an absolute measure of water quality and shows trends in water quality over time.</p>

Mr David Hogan Royal Holloway Institute for Environmental Research	3.1 – How are target RQOs set? I class 2 preferred to class 1 for some rivers?	RQOs are set using a different classification scheme, namely the River ecosystem (RE) Classification. In addition to BOD, total ammonia and DO, four further determinands are assessed, unionised ammonia, pH, dissolved copper and total zinc. We set realistic, sustainable, achievable RQOs based on current and anticipated uses of the watercourse. In some cases RE2 is more realistic due to physical characteristics of river.
	3.2 – How many samples represent 3 years of monitoring data? How does this relate to the statement at the top of page 8?	There are thirty-six samples in three years of monitoring data (both RE and GQA). We will replace the word 'monitored' with 'assessed' at the top of page 8.
Mr John Woodland Conservation Officer Devon Bird Watching and Preservation Society	We are happy with the plan and the issues contained within it. It is good to see the various BAPs mentioned and hopefully the targets contained within these plans will remain high on all our agendas.	Thank you for your comments.
Mr A Brian George Exeter	I think you have correctly identified the problems in the catchment area. A first rate document presenting factual information. I wish to highlight silting problem at Crediton arch of three-span bridge at Cowley bridge.	We are aware of the silting problem and our Flood Defence section undertakes regular inspection and annual de-silting. In the longer term we will carry out modelling work to assess if any improvement can be achieved.
Mr Hugh Maund Chairman Exe Valley Fishery	Flood Plain Maps – It is quite clear that the existing Agency maps are inaccurate. To retain credibility the Agency should ensure all flood plain maps are reviewed to ensure accuracy.	The recently completed Section 105 Survey flood plain maps represent the indicative 100-year return period flood. Where they are found to be inaccurate they are amended. This review and correction process is ongoing.
Mr John Wokersien Town Clerk Exmouth Town Council	In general the Plan is supported and the principle of protecting the special environment of the Exe area.	Thank you.
	Reports on river water quality should be made available to the Town Council and displayed on public sites in the estuary area, just as sea water quality information is publicised	River quality and EC standards information is made available through several methods of publication via reports, LEAPs and the Agency web site. Unlike bathing water standards both RE and GQA standards are non-statutory. Information is also available from us on request.
	There appears to be no reference to bass fishing, bait digging, shellfish digging and the need to protect these particular resources.	The Exe Estuary Management Plan covers these issues.
	The Exeter Canal Management Plan is not referred to and this could affect river traffic so is relevant.	The Exeter Canal Management Plan is mentioned under Issue 4 and action 4a.

Mr Aidan Winder Devon County Council	Section 2 – Is rather thin and downplays archaeological and historic importance. The plan area contains a very rich and diverse historic environment from earliest Stone Age tools to Cold War defensive sites of the 20 th Century.	We will revisit the text with a view to giving a more representative account of the catchment.
	Section 6 – Archaeology There is scope for greater emphasis on the Agency's duty with regard to archaeology within the Issues and Actions outlined within the body of the Plan. The only major recognition of the historic environment is in the section on Urban Development. It might we better included in Section 2.4. Many actions have or have the potential to impact directly and negatively upon the historic environment.	We note your comments and will review how archaeology has been incorporated into the LEAP with a view to ensuring that the coverage is sufficient and that issues are highlighted within appropriate sections.
	Map 6 – The AGLV boundaries have been revised so this map is incorrect. The area now covered is wider.	Noted, our maps will be amended accordingly.
Mr David Newcombe Chairman Culmstock Parish Council	Over the last ten years a number of weirs have been totally destroyed causing serious erosion in a number of areas requiring costly remedial action to banks. Increased speed of flow has scoured out the river bed and will affect the water table and eventually change the habitat and species both in and around the river.	Weirs belong to the landowners who are responsible for their maintenance. We have permissive powers to carry out works on main rivers for Flood Defence work, but not for erosion control. This is the responsibility of the riparian owner. We are keen to allow natural river processes to function and will intervene only where absolutely necessary. If there are implications for bankside ecology following weir collapse, the situation needs investigation and we can provide assistance.
Mrs Lorna Knowles Clerk to Bradninch Town Council	The Council found the document interesting and an excellent analysis. We agree with the proposed actions and look forward to the Action Plan in 2000.	Thank you.
Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter	2.3 Wildlife – Habitat and Species – we are pleased to see that CWS and LWS are acknowledged, but find the description of fish in the catchment in terms of fishing issues rather bizarre. A description of wild fish populations would be more appropriate and sport fishing moved under 2.5 Land Use - Recreation and Amenity.	The text will be revised for the Action Plan.
	2.5 Table 1 – Are the grass land figures taken from MAFF data? Is there a breakdown of unimproved, improved semi-improved proportions? This may give an indication in future reviews as to whether or not unimproved and semi-improved grassland areas are in decline.	The data is from the MAFF Agricultural Census, which is carried out every 10 years. The data for grassland <5 years (14,921 ha) and grassland >5 years (66,379 ha) were amalgamated together for the purposes of the LEAP table, no further detail is available.

<p>Ms Mary-Rose Lane Rivers & Wetlands Officer Devon Wildlife Trust Exeter</p>	<p>3.3 EC Directives – has the decision on Exe designation under the Shellfish Waters Directive been made yet? Could the result of the consultation be included in the LEAP Action Plan when published?</p>	<p>The Exe has now been designated as Shellfish Water under this Directive and the text in the LEAP Action Plan will be changed accordingly.</p>
<p>Mr Richard Weaving Head of Countryside Management Teignbridge District Council</p>	<p>I found your draft to be a useful statement of the Agency's plans for the coming years. The level of commitment to environmental protection and enhancement is impressive. For fairly technical document I found the writing to be clear and easy to understand, nicely laid out and largely free of small errors. At the same time I am confused about the extent of the Agency's interests and responsibilities.</p>	<p>Thank you for your positive comments. Section 6 is meant to summarise our interests and responsibilities. Any comments on how this could be made clearer will be considered.</p>
<p>The Exmoor Society Dulverton</p>	<p>The broad representation of the Steering Group which will monitor the implementation of the Action Plan is noted, especially the inclusion of the Exmoor National Park Authority. We feel that overall the plan will be to the benefit of the catchment, and we are grateful for the opportunity to comment upon it.</p>	<p>Thank you.</p>
<p>Mr Tim Robbins Mariculture Officer Devon Sea Fisheries Committee</p>	<p>There are concerns amongst the shellfisherman, ourselves and the estuary management group over the omission of testing for anti-fouling paints from the LEAP Plan. Proposed dredging of the Topsham Quay showed that high levels TBT was still present in the muds around the quay and could have been put back into suspension in the river when dredging took place. TBT paints have disastrous effect on molluscan shellfish in particular pacific oysters. The Exe suffered in the early eighties and there are still shells on the grounds today showing the classic TBT deformities. The beds at Cockwood were also effected. I feel that the EA should re-establish their sampling scheme for TBT in the Exe to assess current levels. There should also be a new advertising scheme around the local boatyards to warn against the use of TBT.</p>	<p>Regarding dredging within the Exe Estuary. We have requested that Exeter City Council undertake an environmental impact assessment in order for the Agency to properly assess their proposal and have stated that heavily contaminated sediments should not be dredged. There has been no sampling for TBT on the Exe catchment as there have been no consented discharges of the material. We held a meeting with DSFC, DCC and the Exe Estuary Co-ordinator in October to discuss TBT issues. We are considering whether monitoring should be undertaken, DSFC will take some shellfish samples. This should help us to assess whether we have a problem or not.</p>

<p>Mr Tim Robbins Mariculture Officer Devon Sea Fisheries Committee</p>	<p>There has also been a scare over the use of Irgarol based anti-fouling paint. This also requires a monitoring programme from the EA to assess present levels and whether they are safe or whether they are likely to cause a problem in what is an environmentally sensitive estuary.</p>	<p>To date there is no R & D information on the impact of the substance, however the Health & Safety Executive are currently reviewing the authorisation for the product. We are concerned if this product has an adverse environmental impact and would seek to influence its safe use dependant on the outcome of the review.</p>
<p>Mr Rod Lawrence Faraway Wildlife Cullompton</p>	<p>There are many people who argue that conservation reduces the economy of a particular area. Conservation of wildlife is in fact doing the opposite throughout the world, bringing huge numbers of tourists where before there were none. Within the Exe estuary there are thousands of tourists visiting the area during the winter months because of the success of bird conservation. The wildlife is bringing in the tourists in larger numbers each year. Conservation pays!</p>	<p>We note your comments regarding the contribution conservation makes to the local economy. This case is well made within the document we recently produced in conjunction with the RSPB, English Nature and others, 'An Environmental Prospectus for South West England'. Copies available from either the RSPB or our Regional Office.</p>
<p>Mr Tony Bostock Member Midlands RFERAC & Upper Severn AEG Staffordshire</p>	<p>Grayling – I was under the impression that there is a small population of grayling in the Exe system, but shows no sign of increasing or expanding its range.</p>	<p>Noted.</p>
	<p>Funding – In addition to land fill tax credit scheme already mentioned, surely there is scope for applying for European funds or lottery grants for conservation and fisheries projects.</p>	<p>We are already involved in a number of European and Lottery Funding bids, we will continue to investigate all avenues for funding.</p>
	<p>Protection, enhancement and restoration of riverine and other wetland habitats – I believe this should be an issue on its own right.</p>	<p>We are addressing a number of problems associated with habitat loss within the LEAP. In addition, we are working at a national level to influence Government.</p>
	<p>Unauthorised river works – Included in the Action Plan must be an education programme, aimed at landowners, fishery owners and farmers etc. The Agency must use its statutory powers rigorously in the future to prevent further damage.</p>	<p>We agree an education programme aimed at landowners and riparian owners is a good idea. We will consider including text in the Action Plan. We catch most intended work through the planning process. The works we can control do not give rise to major problems. However riparian owners have a common law right to extract gravel from the riverbed. Our lack of powers to control this type of works was highlighted to the Legislative Review Group and we await the outcome.</p>

<p>Mr Noel Waine Secretary – East Devon Group The Council for the Protection of Rural England</p>	<p>The overall concept is welcome, and in general readily accessible to the layman, although in one or two places the text gets bogged down in technicalities and acronyms – section 3.4 on page 9 is a good example of this.</p>	<p>We have reworded the text and consequently Appendix Three for the Action Plan to clarify the information.</p>
<p>Dr Robin Cotton Renewable Heat & Power Ltd Barnstaple</p>	<p>Despite words about commitment to sustainability, any reference to small-scale hydropower is absent from the LEAP. The plan should include a section that systematically identifies the hydro-electric power potential of the river Exe and its tributaries. Beasley Weir in Brushford is an example. A well designed hydropower scheme, with proper screening, should have no detrimental impact on fish. We believe that each region should be acting locally in helping to achieve the government's target of producing 10% of the UK electricity from renewable sources.</p>	<p>Whilst we are keen to see initiatives developed which contribute to a more sustainable method of energy production, we are also very concerned about the other environmental consequences of such proposals. Such as barriers to fish migration, depletion of river stretches bypassed by such systems, changes in flora and fauna of the impounded/depleted or affected reaches. We have a duty to regulate such abstractions to ensure that the environment is protected. We would be interested in receiving information about any new technologies that would help fish passage.</p>
<p>Mr K Hill Tiverton</p>	<p>Fish Stocks are well down from what they were twenty to thirty years ago.</p> <p>There are too many rainbow trout getting into the Exe. More coarse fish being put into the Exe and Pike when caught put back, why?</p> <p>Stop the striping of salmon on redds.</p>	<p>Our 1995 Exe Fisheries Survey recorded bullheads, stone loach and minnows at all sites from Exebridge downstream to Up Exe. We also have a project to assess the status of wild brown trout. We have often removed rainbow trout from the Exe. It is not the policy to remove coarse fish from the river. Consented fish stockings have been in lower reaches below Cowley Bridge. Any collection of eggs from broodstock in the upper reaches of the Barle is agreed with RETA. Surveys indicate that juvenile populations are not adversely affected by this operation.</p>
<p>Mr Richard Hill Exe Estuary Co-ordinator Exeter</p>	<p>I would like to congratulate the Agency on the effort taken in producing the Exe LEAP. The close links with the Exe Estuary Management Plan are welcome. However implementation of the actions rest with lead agencies identified within the EEMP and not necessarily the Management Partnership.</p>	<p>Thank you. Noted.</p>
	<p>Section 3 should be clearer with regard to where RQOs and GQA are used in relation to fresh and marine waters.</p>	<p>We will amend the heading for Section 3.</p>

<p>Mr Richard Hill Exe Estuary Co-ordinator Exeter</p>	<p>Inclusion within Section 5.3 of a description of the work of the EEMP is welcomed, particularly the emphasis on co-ordination with the LEAP. However some changes to this paragraph need to be noted.</p>	<p>Thank you for the additional information the Action Plan text will be amended.</p>
<p>Mr Mike Ellingham Senior Technical Adviser NFU South West Region Exeter</p>	<p>3.4 – We question why the BMWP score is calculated using only tolerance to organic pollution. This will tend to bias the results against the farming industry than if; for example, pollutants such as cadmium were taken into account.</p>	<p>Organic pollution can come from a number of sources, eg discharges from sewage works, paper mills, food industry wastes etc in addition to farm wastes. The BMWP score was devised as a means of relating the invertebrate fauna of a river to the water quality, impacts from pollutants other than organic matter can also be detected, eg toxic effects resulting from elevated levels of metals.</p>
	<p>We are concerned in general terms that many of the proposed actions derive from subjective assessment and fairly woolly impressions. We note with concern that the farming industry was not represented on the steering group (although this has now been rectified) and we would have wished to see far more supporting evidence, for example, the analyses to support the failures of RQOs.</p>	<p>The plan deliberately avoids including large amounts of data or analysis; instead it summarises to make it more readable. We can provide details of data and analyses upon request. We agree it was unfortunate that farming was not represented on the steering group due to the representative's illness. We are pleased to have found a replacement.</p>
	<p>The actions listed are very much a wish list without costing either to the Agency or to those affected. We would suggest that the BATNEEC technique be applied to all the actions proposed.</p>	<p>The actions in the report are proposed actions and it is not practical or possible to apply any form of cost benefit to them at this stage. When actions have been agreed in principle we can then apply cost benefit assessment and secure funding for them.</p>
<p>Mr J P C Shapter Exmouth</p>	<p>LEAP Plan not much different to NRA publication of December 1995.</p> <p>Many points and comments were raised concerning the management of the Exe Estuary.</p>	<p>The CMP of 1995 was used as a basis for this LEAP plan updating it and expanding it as necessary to cover all the responsibilities of the Agency.</p> <p>Noted and forwarded onto the Exe Estuary Co-ordinator for his information.</p>
<p>Mr Jonathan Calderbank Development Manager Sport England – South West Region Crewkerne</p>	<p>The Exe LEAP Consultation Draft is thorough and satisfactorily prescriptive through the proposed Actions under each Issue. Greater priority should be given to addressing fisheries' issues and the access needs of water sport participants.</p>	<p>We endeavour to achieve a fair balance between these interests and seek to reflect this within the LEAP.</p>

<p>Mr David Boyce Ecologist Exmoor National Park Authority Dulverton</p>	<p>We would like to congratulate you on the production of an excellent document and look forward to working with you to achieve the objectives it sets out.</p> <p>Section 2.3 – Exmoor Heaths candidate SAC is also in the Exe catchment and is therefore also of international importance.</p>	<p>Thank you.</p> <p>Noted, we will amend the text for the Action Plan accordingly.</p>
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Comments also received from:

Dr R Dukes, Inland Waterways Association, Broadstone
 Mr Derek Madge Exminster Parish Council
 Mr F White, City of Plymouth
 Mr M J Woodward, West Dorset District Council
 Ms Christine Langford, Somerset Rural Development Area, Langport
 Mr Martin Venning, environment Agency Liaison Manager, Wessex Water Services Ltd
 Mr J O G Adams, Clerk to the Council, Morebath Parish Council
 Mr A P Radford, Vice Chairman, Somerset Archaeological & Natural History Society, Taunton
 Mr T M Thompson, Clerk to Bickleigh Parish Council
 Mr T Carter, Teignmouth