

**NORTH WEST NORFOLK
LOCAL ENVIRONMENT AGENCY PLAN**

Statement of Consultation

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Environment Agency
Anglian Region
Central Area
Bromholme Lane
Brampton
Huntingdon
Cambs
PE28 4NE

Tel: 01480 414581
Fax: 01480 413381

NORTH WEST NORFOLK LEAP STATEMENT OF CONSULTATION

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1.0 INTRODUCTION

The North West Norfolk Draft Local Environment Agency Plan (LEAP) was launched in December 1999. This marked the beginning of a three-month consultation period.

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

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

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

Table 2 describes the feedback received, including errors and omissions. A list of respondents can be found at Appendix 1.

2.0 FORMAL CONSULTATION

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

- Distribution – The Draft LEAP was distributed to over 200 organisations and individuals, with a request for written feedback.
- Promotion – Documents and poster displays were sent to libraries and local authorities. Press releases were issued and radio interviews were given.

3.0 STAKEHOLDER GROUP

As part of the North West Norfolk LEAP process, we agreed to participate in a collaborative trial project with the Environment and Society Research Unit (ESRU) of University College London's Department of Geography. The aim of the project was to explore ways of improving the participation of key stakeholders and to improve consultation by involving them from the outset. Thus, 37 organisations and individuals were invited to form the North West Norfolk Stakeholder Group; a list of those who accepted is included in Appendix 3. The project was led by ESRU, and the Agency participated as one of the stakeholders. Following a series of site visits and meetings, the Group identified the environmental issues and ranked them in terms of local importance for full consultation through the Draft LEAP. This process was independent of and additional to the work of the local Sub Group of the Area Environment Group.

4.0 AREA ENVIRONMENT GROUP (AEG)

The Great Ouse AEG consists of a group of people from different walks of life, who have broad experience and interest in environmental matters and who represent our customers. AEG members include, for example, river users, local authority representatives, farmers and industrialists. One of the roles of the AEG is to advise and comment on the LEAP process and discuss priorities, proposals and key issues within the Plan. Initially, a 7 member Sub-Group was appointed to work on the North West Norfolk LEAP with the Agency Project Team,

providing input and detailed feedback at every stage of its production. A list of current members can be found in Appendix 3.

5.0 RESPONSES

We received 36 letters written in response to the Draft LEAP (see Appendix 1), which are outlined in the tables below. All responses were acknowledged. One letter made no comment. All other responses were considered whilst developing the LEAP in a way that we believe reflects a reasonable balance between the opinions expressed and our desire to ensure that the plan is feasible and robust.

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

- concern about water resource issues for the environment, abstractors, recreational uses and development;
- concern about levels of siltation in the Tidal River, particularly for its impact on navigation;
- support for activities that will enhance recreational aspects, and the need for consultation with users; and
- the importance of partnership working to maximise resources and results.

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

Table 1: Number of responses made on each issue

Issue No	Issue Title	Number of Responses
1	The demand for water during the summer can often exceed available resources	8
2	A better understanding of the water balance of the LEAP area is required	8
3	A better understanding of the water requirements of the environment and the impacts of abstraction is needed	8
4	The allocation of the water resources and the licensing policy require restating	5
5	There is concern over the impact of engineering works on riverine habitat diversity	8
6	There is a need to assess and, where appropriate, protect the ecological status of headwaters	6
7	BAP targets specific to the LEAP area are unknown	6
8	There is a need to reassess the mowing regime of river banks to minimise disturbance to wildlife	5
9	There is a need to protect habitat outside designated areas	3
10	There is concern over the impact of river structures on sea trout populations in the rivers Nar and Babingley	5
11	There are problems with fish being pumped out of the Middle Level System during times of high flows	2
12	There is an absence of grayling in the River Nar	4
13	There is a need to improve recreational and navigation access to Agency-owned land on the Relief Channel and the Cut Off Channel	9
14	There is concern over environmental impacts of Blackborough End waste management sites	1
15	A number of river stretches fail to meet their River Ecosystem targets	5
16	There is concern over eutrophication of the Great Ouse estuary	3

Issue No	Issue Title	Number of Responses
17	Groundwater is vulnerable to pollution	5
18	Hunstanton Main and Heacham North beaches fail to meet guideline bathing water quality standards	4
19	There has been a failure to meet environmental quality standards (EQS) for tributyl tin in the Great Ouse estuary	1
20	There is concern over the impact of poor water quality on the River Nar SSSI	6
21	There is concern over the air quality in North Lynn	0
22	Sea defences at Sea Banks East (Wolferton to Snettisham) need re-shoring and re-profiling	2
23	There is concern that tidal defences between Hunstanton and Snettisham provide inadequate protection from flooding	1
24	There is the potential for King's Lynn (South Quay) tidal defences to be compromised	2
25	There is concern over the impact of siltation on flood defences and navigation in the Tidal River	9
26	Water Level Management Plans need to be completed	6
27	The future of Snettisham Beach groynes needs to be evaluated	1
28	There is a need to meet Bye Report actions for improving flood defences to the specified deadlines	0
29	There is an inadequate level of flood defence protection on the River Nar	6
30	The use of managed realignment as part of the coastal defence strategy in the east of the Wash needs to be evaluated	4
31	Proposed development behind River Nar flood defences is of concern because of insufficient flood protection	4

Table 2: Summary of consultation responses

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

General Comments

Consultee (Date)	Comment	Response
Dr R B Rickards (14/12/99)	There is a deal of very useful general information in the Draft LEAP that would be useful to any newcomer.	Noted.
King's Lynn Consortium of Internal Drainage Boards (4/1/00)	<p>We welcome the LEAP and the extensive consultation that has preceded it.</p> <p>However, as is common with these reports, we feel that the IDBs' contribution to the management of the water environment is insufficiently recognised. The Boards have potential to make a significant contribution to biodiversity targets and other conservation issues identified by the Agency, yet they are rarely listed as key partners.</p>	<p>Noted.</p> <p>Noted and taken forward.</p>

Consultee (Date)	Comment	Response
The Norfolk Society (West Norfolk Branch) (30/3/00)	<p>The committee generally is in agreement with the content of the plan, which gives a clear and concise explanation of the issues.</p> <p>In particular we welcome the priority given to water abstraction and water conservation as well as the identification of the principles of sustainable development as a means of protecting natural resources and enhancing biodiversity.</p> <p>Issue 9 and the 'Green Shoots' education strategy for schools and industry were felt by our committee to be effective ways of protecting the countryside and of raising the level of environmental awareness.</p> <p>We feel the Human Rights Act 1998 should appear in the final LEAP, since it will affect the operations of the Agency. The Act places a statutory duty on 'public authorities' (such as the Agency) to comply with the European Convention on Human Rights. From October 2000, the UK courts will deal with the legislation (currently dealt with by the European courts). Article 8 can be applied to environmental damage, or the <u>potential</u> for such damage. Article 1 of Protocol 1 establishes protection for individuals with acquired rights with economic interest and this may be applied to, for example, water abstraction licences, fishing rights or other riparian rights.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>The Agency's legal services section has been considering the implications of the Act for some time now and has sought preliminary advice from Counsel. Our decision making process already seeks to balance the rights of the individual and of the wider public, and at this stage the Act does not raise any fundamental concerns.</p>
The Inland Waterways Association (Head Office) (30/3/00)	We find the great majority of the proposed actions to be acceptable.	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	We commend the Agency on a comprehensive and well laid-out document.	Noted.
Sport England (3/4/00)	Sport and recreation appear to be relatively minor considerations in the Draft LEAP, although I acknowledge that Issue 13 deals with navigation on the Relief Channel and Cut Off Channel. I would hope that any actions arising from the LEAP would seek to fulfil the recommendations of the Water Recreation Strategy.	All actions arising will be in line with the Strategy. Issue 13 fulfils the recommendation that the Agency should continue to provide new riverside facilities for informal recreation, public access and waterway users.

Consultee (Date)	Comment	Response
English Nature (Norfolk) (4/4/00)	<p>English Nature supports the work carried out by the Agency in the preparation of LEAPs and believes they have a key strategic value. We look forward to working closely with the Agency in achieving the implementation of proposals incorporated into this plan.</p> <p>English Nature's broad policy on sustainable development is to ensure choices are available to meet social, economic and environmental needs without undermining the quality of the natural environment.</p> <p>Throughout the LEAP key actions are identified to improve water management and deliver environmental enhancements. The prioritising and timetabling of the work, where appropriate in collaboration with partners, is important. English Nature would be pleased to be involved on the Stakeholder Group for this process.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>We appreciate this offer but the stakeholder process is now complete.</p>

Key Details

Consultee (Date)	Comment	Response
Middle Level Commissioners (14/1/00)	It would appear from your map that, although the Middle Level Main Drain is situated in the LEAP area, the Commissioners' District is not.	Middle Level Commissioners are listed in the Key details under the Internal Drainage Boards. The map included inside the front cover is to give the reader an idea of locality.

Executive Summary

Consultee (Date)	Comment	Response
Norfolk County Council (NCC) (14/3/00)	<p>Enjoyment of the Waterways (and other recreation sections) - Authority staff are pleased with the partnership with the Agency, whose contribution is important to improving recreation facilities in Norfolk.</p> <p>Managing Waste – It is assumed that the 'need for greater liaison with site operators' refers to Anti Waste and William George sites, not Norfolk Environmental Waste Services/NCC's closed site. Agency staff have recently had discussions with a site operator about environmental monitoring.</p>	<p>Noted.</p> <p>This item relates to operational licensed sites and the text has been amended accordingly.</p>
Country Landowners' Association (Norfolk) (2/4/00)	Under the paragraph 'Risks to Water Quality', we would like to see emphasis placed on the problems of sewage works' run-off. We believe those relating to agriculture are well flagged-up and are in any case now minimal.	There will not be run-off from sewage treatment works as their discharge will be point source controlled by discharge consents. The emphasis is now on diffuse discharge, which is primarily from agriculture. The Eutrophication Strategy will highlight research areas to investigate any impacts from this nutrient source.

Draft Vision for the LEAP Area

Consultee (Date)	Comment	Response
Dr R B Rickards (14/12/99)	There is no mention in the Vision of aiming to reduce run-off rates. Small and large efforts to decrease run-off may be less important in NW Norfolk, compared to every other LEAP area in the Central Region, but it is still important enough to be catered for in a vision or mission statement.	The document 'Sustainable Urban Drainage Systems' gives an overview of the techniques used to overcome the problems of run-off. The Agency also has a Strategic Planning Team, which will promote drainage system inclusion in all developments at the earliest possible stage. Local planning authorities are encouraged to include them in their strategic and local plans. Therefore, this is part of our day-to-day task.
Norfolk & Suffolk Yachting Association (3/2/00)	The Association regards the Agency's long-term aim 'to conserve and develop river navigation' as a vital element in all LEAPs with inland waterways.	Noted.
East of England Tourist Board (4/2/00)	The recognition of 'protecting, improving and promoting recreation on or near water' is welcomed, given the importance of tourism in the area.	Noted.
The Inland Waterways Association (Cambs branch) (17/3/00)	The IWA welcomes the many aims, particularly 'to manage water resources ...', which for many years past and for many future years has been and will be a major problem.	Managing water resources is a statutory role of the Agency. This type of issue is common to all LEAPs and is regarded as fundamental to achieve a balance between the needs of the environment and of humans.
Norfolk Wildlife Trust (27/3/00)	The sixth bullet point should refer to an 'appropriate' level of flood protection, rather than just improving or maintaining the status quo. In some cases the level of flood protection may be looking to be reduced (e.g. Proposal 5 of Issue 5). As the identification of biodiversity targets is a first step in many other actions, it could be added to the short-term bullet points.	We do not aim to reduce the standard of flood protection on our embanked Main Rivers. Proposal 5 of Issue 5 refers to natural floodplains on non-Main embanked watercourses, and the text will be amended to make this clear. Noted.
Country Landowners' Association (Norfolk) (2/4/00)	In the introduction to this section, the point should be made that there is no such thing as 'natural habitat'; all habitats, particularly wet ones, require some degree of management. We would like to see the second bullet point under the short-term list reworded as follows: 'managing water resources by improving our understanding of the local hydrology and reviewing <i>and taking account of all</i> abstractors' demands for water and the needs of a water environment'.	Whilst we accept this point for debate, 'natural habitat' describes, as near as possible, habitat that supports wildlife. Noted and taken forward into the LEAP.

Chapter 1 – Introduction

Consultee (Date)	Comment	Response
Norfolk & Suffolk Yachting Association (3/2/00)	We note that one of the Agency's long term aims is 'to conserve and develop river navigation' which my Association regards as a vital element in LEAPs with inland waterways.	Noted.

Consultee (Date)	Comment	Response
The Inland Waterways Association (Head Office) (30/3/00)	<p>We welcome the aim 'to conserve and improve river navigation', but ask why there is no reference to the Agency's duty to promote river and water space for recreation (see Appendix A4).</p> <p>1.2 This section places too great an emphasis on protection and enhancement of the natural environment and too little on the social and economic environment. There is no mention of navigation or recreation, nor the Agency's duties as a manager of water resources.</p>	<p>Noted and taken forward.</p> <p>This section is intended to give an overview of the Agency's routine work and is not intended to be exhaustive. Section 2.8 of the Draft LEAP covers the social and economic considerations.</p>
Country Landowners' Association (Norfolk) (2/4/00)	<p>1.0 The CLA would like the seventh bullet point reworded as follows: 'To manage water resources to achieve a proper balance between <i>socio-economic</i> needs of humans and the needs of the environment'.</p> <p>The four bullet points explaining how the aims are to be achieved are good general management and we would not wish them to be changed. The intention of 'being open and frank when dealing with all issues' is welcomed. We suggest the following:</p> <p>1.3 Alter the second sentence of the second paragraph to: 'It will promote the effective, accountable and integrated delivery of environmental improvement, <i>which is economically sustainable</i> at a local level.'</p> <p>1.4 Add 'and the lives of those living there' at the end of the second paragraph.</p> <p>1.5 Include '... involvement <i>and support</i> of society ...' in the second sentence.</p> <p>We welcome the bullet points below this paragraph, particularly the objective 'to help educate young people'. Young people should understand that the environment has to be managed and that difficult choices must be made. There is a cost associated with this management, either directly or in profit foregone, and it must be appreciated that someone must bear this cost.</p>	<p>Noted and taken forward into the LEAP.</p> <p>Noted.</p> <p>Noted. Section 2.8 covers our socio-economic duties.</p> <p>Noted. Text amended in line with comments.</p> <p>Noted and taken forward.</p> <p>Noted.</p>
English Nature (Norfolk) (4/4/00)	<p>We support the Agency's 'sustainability' approach to water management. We would wish to see 'proper balance' defined as sustainability of the wetland resource into the future – both irreplaceable sites, such as SSSIs, and features within the wider countryside which support wetland wildlife.</p> <p>Table 1.1 Replace 'damage to SSSIs' with 'protection of SSSIs'. English Nature's work with others covers a much wider area than prevention of damage.</p>	<p>Noted.</p> <p>Noted and taken forward into the LEAP.</p>

Chapter 2 – The North West Norfolk Area

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	<p>No mention is made of the rights of the La Strange family to the Wash foreshore of this Plan.</p> <p>2.4.7 There is no mention of the licensed liquid waste disposal site at Chalk Farm, Narborough. Waste transfer sites and their monitoring such as the Glazewing site at West Dereham (sic). The report notes that there are two landfill sites in the LEAP area, although the list of consultees shows eight landfill site managers.</p>	<p>The rights of landowners are taken into account as a matter of course in all of our activities, but are not normally identified in LEAPs.</p> <p>The key details identify 9 operational landfill sites, which are located at: Docking, Wissington, 4 at Blackborough End, Stoke Ferry, Snettisham and Wereham. Docking and Blackborough End are highlighted as the two major sites that accept household waste. Detailed information on waste can be found in the Norfolk Environmental Overview and its Supplement.</p>
Norfolk & Suffolk Yachting Association (3/2/00)	<p>2.6.2 We note the limited extent of navigable rivers within this particular LEAP and in principle, support the idea of using the non-tidal Relief Channel as a link with King's Lynn to provide an additional 17 km of navigable waterway.</p> <p>2.8 We welcome the Agency's acceptance that it should take into account the socio-economic well-being of local rural communities and trust that you will follow this precept in the Broads area, particularly Hickling Brook, where the absence of such consideration is of concern to my association.</p>	<p>Noted.</p> <p>Noted. Under the Environment Act 1995 we have regard to the social and economic well-being of local communities in rural areas.</p>
East of England Tourist Board (4/2/00)	<p>2.6.3 outlines many of the tourism/ recreation uses of the area although it does understate the importance of bathing waters and beaches at the resorts of Heacham and Hunstanton. It may also be worthwhile recognising the importance of tourism to the local economy. A recent study by EETB estimated that in 1996 the overall value of tourism to King's Lynn and West Norfolk was £157.5M, creating almost 3900 job equivalents.</p>	<p>Noted and taken forward into the LEAP.</p>
Breckland District Council (8/3/00)	<p>The NALMI project does not impact on the R Nar – it covers the area around Watton.</p>	<p>The 13 parishes covered by NALMI are outside this LEAP area; the project includes the upper catchments of the rivers Wissey and Tudd, Watton Brook and Wendling Beck, and crosses the boundary between our Eastern and Central areas. The text was included for reference only and will not appear in the LEAP.</p>

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	<p>2.1.2 refers, correctly, to the importance of Wash wildlife. Should there be more reference to the Agency's [and others'] responsibilities as a competent authority for the Wash/North Norfolk Coast Marine European Habitats Directive Site?</p> <p>2.3 NCC suggests that Norfolk BAP species and habitats are marked separately and that lists are updated in accordance with the list provided. In due course, a group of Tranche 2 Biodiversity Species will be added - can this be mentioned in the text?</p> <p>2.4.3 Should the LEAP include more definite targets on water quality e.g. an objective to try to reinstate protected mammal and bird species in all of the LEAP area's rivers by a given date?</p>	<p>This section aims to describe the natural habitats of the LEAP area. The Agency's responsibilities are outlined in Chapter 1 and further detail is contained in the Wash LEAP.</p> <p>Noted and taken forward into the LEAP.</p> <p>It is difficult to produce water quality targets for mammals and birds and this is often not the limiting factor. Targets for such species should be covered by the BAP process.</p>
The Inland Waterways Association (Cambs branch) (17/3/00)	<p>2.6.2 After the first sentence, add the following: 'The problems of siltation of the Tidal River are being considered and action taken.'</p> <p>Before the last sentence in the last paragraph, add: 'The possibility of extending navigation from the Relief Channel via a new channel to the River Nar and thence to a new marina in the Nar Loop in King's Lynn has been suggested and consultations will take place with the Local Authority and others.'</p>	Text amended in line with comments.
East Anglian Waterways Association Ltd (21/3/00)	We remain very concerned about the ongoing siltation problems in the Tidal River, resulting in particular in the difficulties in accessing Salters Lode Lock and the closure of the Old Bedford Sluice. The operation of the Sluice needs to be kept under constant review and the Association hopes the modest improvement recently seen will continue.	Noted.
Norfolk Wildlife Trust (27/3/00)	<p>2.1.1 We would query the statement that there is water available for abstraction from the Norfolk Greensand aquifer. The comments in Issue 1 proposal 5 and issue 2 proposal 1 would appear to caution against greater use of the Greensand aquifer before it is better understood.</p> <p>What is the reason for listing only those SSSIs identified on page 10? There are other water dependent SSSIs within the LEAP area that depend upon springflow and seepage. Section 2.1.2 mentions 8 such SSSIs. We believe that if any sites are to be listed it would be more appropriate for this to be done in Section 2.1.2. Given the relatively low number, all sites should be included.</p>	<p>The current resource balance for the Greensand shows that there is water available for additional abstraction. However, any application for more water is accompanied by a technical assessment of the impacts. The resource balance is due to be reviewed during 2000 as part of the Regional Water Resource Strategy.</p> <p>The three that are mentioned in section 2.1.1 are dependent on aquifers for their water. The text has been amended to make this clearer.</p>

continued...

Consultee (Date)	Comment	Response
Norfolk Wildlife Trust (27/3/00) continued	<p>2.3 We greatly welcome the mention of BAP habitats and species at an early stage within the LEAP, and it is valuable that the different habitats and species are noted individually. However, it is important that the information is relevant to the LEAP area and therefore we would query the inclusion of species that are not present or associated with the area. Conversely, there are other BAP habitats/species for which the Agency is not the lead or contact but which should be included as relevant to the LEAP area.</p> <p>In respect of the level of information presently provided, it would be useful in setting the context to give more detail if it is available e.g. habitat extent or population range and size within the LEAP area. The fact that information may not be available is in itself instructive.</p> <p>Table 2.1 From where do these targets and standards originate? Some standards achieved appear to contradict issues that are being raised as concerns later in the LEAP (e.g. future availability of water resources) and so potentially engender a false sense of security.</p> <p>2.4.3 If biodiversity is a key indicator of sustainability (pages 36 & 80), monitoring is an important pre-requisite and therefore we support all efforts directed towards this.</p> <p>What are the nature conservation targets mentioned and are they in place? If targets are to be adopted the most sensible approach would be to use or incorporate those emanating from the BAPs, rather than potentially having two different sets of targets.</p>	<p>All Norfolk BAP species and habitats have been added to the LEAP. Relevant ones will be marked, as will those for which the Agency is the lead or contact.</p> <p>This is addressed in issue 7 of the Draft LEAP.</p> <p>The four targets are Statutory and given in the Water Resources Act 1991; the text has been amended to reflect this. The standards for PWS are given by OFWAT. The standards for spray irrigation describe current practice in Anglian Region (declared in our Water Resources Strategy 1994).</p> <p>Noted.</p> <p>The word 'targets' has been removed, as BAP targets for the LEAP area are unknown at present (Issue 7 of the Draft LEAP).</p>

Consultee (Date)	Comment	Response
The Inland Waterways Association (Head Office) (30/3/00)	<p>2.6.2 Although the IWA supports in principle the proposal for navigation works on the Flood Relief Channel, it emphasises that the Agency has a legal duty to improve conditions in the Tidal River in accordance with the Anglian Water Authority Act 1977. The IWA is concerned that there is no reference in this section to the serious siltation in the Tidal River, which has now made navigation challenging to say the least. The Association considers that the primary navigation need in this area is to provide bed levels in the Tidal River consistent with those required by the Act. This would:</p> <ul style="list-style-type: none"> a) enable navigation to be undertaken more safely on the Tidal River; b) provide greater depths in the Tidal River near Denver, which would remove the difficulties at neap tides in navigating between Denver Lock and Salters Lode Lock. It would also enable the route into the Middle Level via Old Bedford Sluice/Old Bedford River/Welches Dam Lock to be reopened; c) reduce low tide levels at Denver, allowing Denver Sluice to be operated more frequently (which will assist in the removal of silt from the Tidal River), facilitating the use of the Old Bedford Sluice and improving the opportunities for long craft to pass through Salters Lode Lock when the tide 'makes a level'; d) reduce low tide levels at Welmore Lake Sluice, allowing the Ouse Washes to be drained efficiently to the benefit of agriculture and nature conservation; and e) improve depths for navigation in the Hundred Foot River. 	<p>Noted and taken forward. Issue 25 has been carried forward in recognition of this.</p> <p>This is being addressed through the Ouse Washes Habitat Protection and Funding Group.</p>
The Norfolk Society (West Norfolk Branch) (30/3/00)	2.2.3 Hardings Pit is no longer designated for mixed residential/business use but as an 'open space' in the Nar Ouse Regeneration Area proposals.	Noted and taken forward.
Country Landowners' Association (Norfolk) (2/4/00)	2.2.2 We welcome the recognition of the vital part agriculture plays in this area. We believe that the number of full-time, part-time and temporary jobs dependent on food-producing businesses is considerably more than 10,000 although we accept that this is hard to quantify. What is important is that the percentage of jobs dependent on food-related businesses is a great deal higher in this area than almost any other area in the UK. It is important to recognise that there is no ready supply of alternative work.	Noted and taken forward.
Continued....		

Consultee (Date)	Comment	Response
<p>Country Landowners' Association (Norfolk) (2/4/00) continued</p>	<p>The third paragraph of this section recognises the conflict between the demand for efficiently and cheaply produced food and the demand for the countryside to be protected and cared for. We believe that this conflict should be emphasised, because it is the farmers who are left to bear the costs, and government and EC subsidies only partly cushion the effect. The problems, which recently came to a head over the two-metre restriction on hedgerows, are an excellent example of this.</p> <p>2.2.3 The CLA has been voicing concern, in a number of forums, about the provision of water supplies for proposed developments in the county. We urge planners to identify sustainable water supplies before permitting development; this must not be allowed to occur to the detriment of other abstractors, such as farmers. We also urge the Agency to take very serious consideration of the demand which new housing will create. The CLA will be extremely critical if water resources for agriculture are adversely affected through insufficient planning taking place now.</p> <p>We have been supporters of the proposal to build a reservoir at Feltwell since its conception. We regret the proposal has now been shelved, on grounds of cost. We are firmly of the opinion that this reservoir will one day be built; when that time comes, a great deal more will have been spent on it than would have been the case if the decision to go ahead was taken now. The sooner such a decision is taken, the better.</p> <p>2.3 We consider that this section is weak and if it is to play a meaningful part in the formulation of the LEAP, which it should, it should be a great deal more comprehensive.</p> <p>2.4.2 We are unhappy with the bullet points relating to the need to meet reasonable demands. We believe that recent droughts have indicated only too clearly that water resources are fragile and sometimes inadequate and this has been emphasised by restrictions to spray irrigation, usually at the very same time when it is most needed. Furthermore we believe there are many local issues that relate to the reliability of water supply for the agricultural industry.</p>	<p>This is addressed in Section 2.8 Socio-economic considerations.</p> <p>The Agency does consider water demands made by new development. We work closely with water companies and planners to discuss water availability. We also encourage new development to incorporate water saving measures such as grey water reuse, water butts etc.</p> <p>The decision to go ahead with the promotion of the reservoir lies with the beneficiaries (water companies). However, they have not identified the need for such a reservoir within the next 25 years and have decided to progress with other options in the interim, such as demand management, leakage control and enhancement of existing supplies.</p> <p>Noted and taken forward.</p> <p>Noted. The second bullet point does state that water resources are not always available for spray irrigation and that the 1 in 12 year target is not met.</p>
Continued...		

Consultee (Date)	Comment	Response
Country Landowners' Association (Norfolk) (2/4/00) continued	<p>We would like to see a more robust approach to ensuring that water supplies are properly used, and are concerned that there is some complacency implied in this section.</p> <p>2.6.1 One of the main sources of income in the area is tourism. We believe that it should be recognised that the landscape contributes in no small measure towards this.</p> <p>Table 2.2 The last section of this table refers to 'vast commercial conifer plantations'. We do not think that these occur in this area but are willing to be corrected.</p> <p>2.8 We strongly support the first paragraph of this section and would like to see something similar in the Vision. We would like to see the first sentence amended as follows 'We are required to have regard to any effect that our proposals would have on economic and social well being of local communities in rural areas and <i>which is thus sustainable</i>'.</p> <p>The CLA is one of the supporters of the NALMI project.</p>	<p>The Agency is not complacent about the proper use of water, but we have only limited powers to ensure water supplies are properly used. Where we can, we encourage efficient use. Abstraction licence applications are subject to an assessment of whether the quantities applied for are justified and reasonable. We also have active R&D into optimum use of water in industry and agriculture so that best practice can be incorporated into our assessments and promoted to water users.</p> <p>Noted and taken forward.</p> <p>This table gives a Character Area description as given by the Countryside Agency.</p> <p>Noted and text amended inline with comments.</p> <p>Noted.</p>
Essex & Suffolk Water (4/4/00)	Given the importance of the Ely Ouse-Essex transfer scheme to regional water supply (not just ourselves, but other water companies and river abstractors), reference to the Denver complex in this context should be made more explicit.	Noted and taken forward.
English Nature (Norfolk) (4/4/00)	2.4 We are pleased to note the inclusion of BAP species and habitats and that they have been listed individually. However, we would question the inclusion of species and habitats not present or associated with the LEAP area. The LEAP covers a specific area and we believe that the species and habitats mentioned should assist you with drawing up a LEAP specific list.	The list includes all species and habitats for which the Agency is the lead for information purposes. Habitats and species associated with the LEAP area are highlighted.

Chapter 3 – Issues and Proposed Options

Consultee (Date)	Comment	Response
Middle Level Commissioners (14/1/00)	The identification and ranking of issues by the Stakeholder Group, rather than by Agency staff or committees, and the refusal of the Agency to consider the implications of this prior to publication of the Draft LEAP give cause for concern.	Noted. The decision to go ahead with this research and development project was supported by both our Area Management Team and the Area Environment Group. As a result of the formal consultation process, some issues have been changed and the priority ratings will not appear in the LEAP.
Norfolk County Council (14/3/00)	All water resources/wildlife issues covered are worthy of attention and it is good that they have been fully recognised in the LEAP.	Noted.
Government Office for the East of England (26/1/00)	<p>It would be helpful for the LEAP to distinguish between fluvial and coastal management issues, recognising that coastal management is subject to wider sedimentary processes beyond the LEAP area, which may have implications for coastal defence priorities.</p> <p>Issues affecting natural and cultural resources of recognised importance should be considered in the context of advice in PPG Notes 9, 15 and 16. Where SSSIs are affected, such as in the River Nar corridor (issues 15 and 20), it would be appropriate to agree targets and priorities with English Nature. It would be appropriate to seek representation from English Nature in the Stakeholder Group.</p> <p>In the formulation and evaluation of strategies and options, it is desirable to promote courses of action that have regard for environmental capacity. Whilst it may be technically feasible to apply engineering solutions to problems, these may have an environmental cost (e.g. pumping generates carbon dioxide). It is preferable to manage the use of resources so that consumption is contained at a level that does not require correction by engineering methods.</p>	<p>Noted. Reference to the Wash LEAP and Shoreline Management Plan (in which coastal management is dealt with in more detail) will be made in the Flood Defence introductory text.</p> <p>Noted.</p> <p>Noted.</p>

Consultee (Date)	Comment	Response
Norfolk & Suffolk Yachting Association (3/2/00)	<p>Table 3.2 We note that Theme 6 incorporates the largest number of separate issues, of which issue 13 is one. However, when it comes to priorities, we are disturbed to find that it is the lowest ranked in the non-flood defence category, and consider that it should be higher. If this low priority is related to the probable cost of the 'Action Plan for Navigation', is it reasonable that the cost and complexity of attracting partnership funding should so dramatically affect priority rankings? We think that the relatively modest navigational improvements envisaged should take a much higher priority and thus act as a challenge to partnership funding bodies. At the moment, so low a priority could result in it being shrugged off for many years.</p> <p>We are concerned that, of the 31 issues listed in Chapter 3, only two mention advantages or disadvantages for navigation (issues 13 and 25). It seems unlikely that none of the options being considered for other issues would have implications for navigation (eg proposal 3 of issue 1, proposal 4 of issue 5 and proposal 3 of issue 10). We suggest that somebody from the Agency should look at this chapter and insert any references that may then become necessary.</p>	<p>The purpose of the R&D project described in Section 3.0 of this document was to engage local and key stakeholders in identification and prioritisation of environmental issues within this LEAP area. The Agency did not lead this project and had only one representative on the stakeholder group. The prioritised list reflects the outcome of the stakeholder process and was not compiled by the Agency. The priority rankings will not be taken forward into the LEAP.</p> <p>Noted. However, the advantages and disadvantages sections are not taken forward into the LEAP. Navigation interests will be consulted on any matter/project/issue that may affect navigation.</p>
Westacre Estate (7/2/00)	<p>I believe that issue 13 could be ranked above issues 10 and 12.</p> <p>While there are several proposals for many issues, as research and knowledge of 'cause-and-effect' grows, a more limited number of tactics will be needed to achieve what is required.</p>	<p>The prioritised list of issues was a result of voting by all the stakeholders and could not be adjusted. The priority ratings will not be taken forward into the LEAP.</p> <p>Noted. All possible proposals were included in the Draft LEAP to facilitate discussion. The LEAP will be reviewed annually and the activities adjusted in line with new and current research.</p>
Breckland District Council (8/3/00)	<p>The prioritised list's formulation concerns the Council. All issues are important – the level of importance to a particular individual or agency is dependent upon that individual's/agency's perspective.</p> <p>There is no explanation of the methodology, criteria or weighting used in formulation of these lists. It is not known whether the cost of implementation of an issue was a factor or whether the timescale for implementation was considered to carry weight.</p> <p>It would appear that the priorities are 'wish-lists' only; the Council is concerned that ranking priorities in this way could be divisive.</p>	<p>We agree that all LEAP issues are important. The stakeholder analysis aimed to balance all perspectives to try and achieve an agreed priority listing. However, the priority ratings will not be taken forward into the LEAP.</p> <p>'Value for money' was one of the criteria used. A more detailed account of the process is contained in 'LEAPs: Evaluation of a stakeholder approach to environmental management in NW Norfolk by Darren Bhattachary.' (Available on request.)</p> <p>We are keen to involve the local community in our decision making process. Projects like these will help us to identify the most effective way of doing so.</p>

Consultee (Date)	Comment	Response
Great Ouse Boating Association Ltd (GOBA) (9/3/00)	It may be helpful to investigate the inclusion of a GOBA representative in Stakeholder Groups for future LEAPs/Annual Reviews. In the rankings table, flood defence measures are listed separately from other measures and it is noted that issue 25 is ranked number 1.	Noted. Noted.
Norfolk County Council (14/3/00)	The term 'proposals' needs to be replaced with 'options'. I assume that the consultees are supposed to say which options they support. Could the options preferred by the Agency be highlighted in the text?	These tables will go forward as activity tables and therefore 'proposals' will not appear at all. The proposals are put forward by the Agency to facilitate open discussion. New 'options' can also be identified as a result of consultation.
Anglian Water Services Ltd (29/3/00)	The Nine Themes do not appear to embrace bathing water quality. Can the Agency confirm that bathing water quality improvement is a key objective? AWS fully supports the aims of the 'Stakeholder Process', but: 1) the process is very time-consuming. AWS currently respond to 18 Anglian Region LEAPs and a few other LEAPs. AWS would not have the manpower to participate in activities like this on a wide scale. 2) The ranking of the issues will always depend on the membership of the Stakeholder Group; this relates to those groups invited initially and those individuals able to attend the meetings.	Bathing water quality is captured under the theme of 'Integrated River-Basin Management'. It is one of our objectives. Noted. 1) We appreciate how time consuming this process is and that full commitment is required from all the stakeholders throughout the whole process. 2) We tried to ensure that a balanced Stakeholder Group was identified and that members were committed to attending all four workshops. Although attendance did vary, the stakeholders were pragmatic and put forward arguments for both sides.
The Norfolk Society (West Norfolk Branch) (30/3/00)	We are concerned about the environmental impacts of waste management at Blackborough End, the lack of plans to provide navigation between Denver and King's Lynn, and the low priority given to Flood Defence issues.	Noted. The prioritised list of issues resulted from voting by the stakeholders against set criteria and could not be adjusted. The Agency did not lead on this project (see section 3.0 of this report) but was represented as one stakeholder. The priority ratings will not be taken forward into the LEAP.
Country Landowners' Association (Norfolk) (2/4/00)	We are interested to note the way in which the scoring system has prioritised the issues. Our own view is that issues 1, 2 and 3 are those which need to be most urgently addressed.	
Downham & Stow Bardolph IDB (3/4/00)	The Board is disappointed at the low priority that appears to have been given to most flood defence issues.	
East of England Tourist Board (4/2/00)	The Board welcomes the inclusion of 'Enjoyment of the Waterways' in the Plan, the proposals to construct a lock at Denver and new boating facilities along the channel, Agency participation in the Fens Access and Fens Waterways Regeneration Project, and work to improve angling facilities. It would therefore seem appropriate to add Fens Tourism to the list of consultees.	Noted. Noted and taken forward.

Consultee (Date)	Comment	Response
English Nature (Beds, Cambs & Northants) (6/4/00)	Issues of the greatest concern to English Nature in connection with the Ouse Washes have appeared high in both Flood Defence and non-Flood Defence issues. The ranking of Issue 25 (Siltation) as the highest priority flood defence issue is welcomed and the high priority given to Issue 8 (Bank-mowing) is also welcomed. For non-flood defence issues, the priority list is close, but once again, issue 16 (Eutrophication) is another clear priority. In addition, in the face of such large and important environmental issues, the ordering of issue 13, (recreation and navigation) is not seen as a priority.	Noted.

Managing our Water Resources

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	The Council would be particularly interested in any consultation that takes place concerning Catchment Abstraction Management Strategy.	Both Breckland DC and GOBA were consulted during April 2000 on the process of producing CAMS and their content. They will be consulted again when the CAMS for the Norfolk area is produced.
GOBA (9/3/00)	As CAMS will describe abstraction policies that may be important to navigation, it is important that GOBA is consulted.	
Clean Rivers Trust (15/12/99)	Enlargement of King's Lynn power station is still an option; despite the Government's moratorium on new gas-fired power stations, over 40 have been given the go-ahead since it was imposed. The increased water take would impact on the environment.	Any increased abstraction would require a licence and would therefore be subject to a technical assessment of the potential impacts. A licence would not be granted if the impact was considered unacceptable.

ISSUE 1 THE DEMAND FOR WATER DURING THE SUMMER CAN OFTEN EXCEED AVAILABLE RESOURCES

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	Proposal 3 would usually require consent under General Development Order (GDO). The disadvantages would include impact on the landscape – the Nar Valley is identified in the Breckland Local Plan as an Area of Important Landscape Quality. The Council would be concerned if existing reservoirs, e.g. Narford Lake which is a private water supply, were to be the subject of abstraction by the Agency. The monitoring of private water supplies is a statutory requirement of the council.	Noted. The Agency considers the availability of water for reservoirs. Other aspects are covered as part of the planning process. This issue refers to the storage of winter water in purpose-built reservoirs, not existing lakes with environmental and other uses.
GOBA (9/3/00)	Proposal 4: If water is transferred from river to river, good control measures must be used to ensure that too much water is not removed from the donor river.	A transfer of water from river to river would require an abstraction licence; it would be subject to a technical assessment of potential impacts and appropriate control conditions.

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	<p>Proposals 1-2 are supported; 3 is also, as long as sites can be subject to winter flushing.</p> <p>Proposal 4 is more doubtful as it is not very environmentally friendly, having water chemistry implications and being likely to incur large environmental costs relating to pumping, thus it is not considered very sustainable.</p> <p>Proposal 5 is only acceptable if there really is water is available on a sustainable basis.</p>	<p>Noted.</p> <p>As stated, this can be at any scale, even within a farm. Large-scale transfers are considered to be an important aspect of strategic management to make best use of water resources. However, the impacts and implications would all be considered fully in an environmental assessment of any such scheme.</p> <p>Noted.</p>
East Anglian Waterways Association Ltd (21/3/00)	<p>This is a recurring theme throughout all LEAPs that we have seen.</p> <p>We campaigned against Essex & Suffolk Water Plc being allowed to increase its abstraction licence at Denver Sluice because of damage that had already been inflicted to the Great Ouse and which is now partly responsible for the problems facing the Agency. Hence we urge the Agency to apply even stronger pressure on water companies and other abstractors to make more efficient use of an increasingly scarce resource.</p> <p>We support all steps to reduce demand by the measures outlined and to encourage more efficient irrigation techniques.</p> <p>Whilst the possible redistribution of water from areas of surplus to areas in deficit sounds an attractive option, the adverse effects of the Ely Ouse-Essex scheme illustrate that this could have unforeseen after effects.</p>	<p>Limited water resource is an issue for most of East Anglia.</p> <p>The Agency does encourage efficient water use, both through the licensing system and as a consultee in the planning system, but we have limited powers in this respect.</p> <p>Transfers are an important aspect of strategic management. The Ely Ouse-Essex transfer is effective and strictly controlled to provide water in Essex whilst protecting the environment and other water users in the Ely Ouse area. The significance of flows to tide is also being monitored.</p> <p>Any proposals for redistribution of water from areas of surplus to areas of deficit would be subject to a full assessment of all the impacts.</p> <p>The potential impact of any abstraction is taken into account in our technical assessment of the proposal. In this part of Norfolk, the summer surface water and much of the groundwater is considered to be fully committed to the needs of the environment and existing abstractors, so few new licences will be granted. In addition, the Habitats Directive review of consents will investigate the potential impact of existing abstraction licences on important wetlands, including the Wash.</p>
The Inland Waterways Association (Head Office) (30/3/00)	<p>This is a recurring theme throughout all LEAPs we have seen in this Region..</p> <p>As a result of siltation in the Great Ouse due to water abstraction, we feel it is necessary for the Agency to take a firm stance with water companies and other abstractors in this area. We opposed Essex & Suffolk Water Plc being allowed to increase its abstraction licence at Denver Sluice in light of these problems and hope the Agency will continue to strictly control the availability of this scarce resource. The Agency should aim to maximise its promotion of efficient techniques of water use. The adverse effects caused as a result of water abstraction should be acknowledged and considered in view of any further water abstractions proposed in the area.</p>	<p>The potential impact of any abstraction is taken into account in our technical assessment of the proposal. In this part of Norfolk, the summer surface water and much of the groundwater is considered to be fully committed to the needs of the environment and existing abstractors, so few new licences will be granted. In addition, the Habitats Directive review of consents will investigate the potential impact of existing abstraction licences on important wetlands, including the Wash.</p>

Consultee (Date)	Comment	Response
Norfolk Wildlife Trust (27/3/00)	<p>We support all positive proposals (1-3) to reduce demand. However, the lower water/abstraction cost in proposals 1 and 3 should not be an advantage, as it undermines the message that water is a finite resource that should be valued and conserved.</p> <p>For proposal 3, we would endorse concerns about the possible environmental effect of reduced winter flows.</p> <p>We agree that the potential environmental and ecological effects of any proposed inter-basin transfers (proposal 4) would have to be investigated thoroughly.</p> <p>We cannot support the continued utilisation of the Norfolk Greensand aquifer (proposal 5) as a solution to this issue because of concern raised in the disadvantage column about uncertain impacts of increased abstraction. In particular, we have concerns about the 'abstract and monitor' approach suggested. This could bring about long-term ecological harm, even if any adverse hydrological impacts are only short-term. We believe that any greater use of the Norfolk Greensand should be based on establishing a sounder scientific knowledge of the aquifer, as suggested in issue 2 proposal 1.</p>	<p>Noted. Although the cost advantage is to the abstractor, all three activities aim to benefit the environment as well.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Any proposals for additional abstraction are subject to a technical assessment of the impacts, and the precautionary approach is applied.</p>
Country Landowners' Association (Norfolk) (2/4/00)	<p>Proposal 3: The CLA supports the new reservoir at Feltwell. (See the CLA's comments under Chapter 2.2.3).</p> <p>Proposal 2: We fully understand the reasons behind this proposal, but wish to draw the Agency's attention to the fact that night-time irrigation has significant problems in connection with health and safety at work issues and the Working Time Directive. This must not be underestimated. It is dangerous for one man to move heavy irrigation equipment in the dark, and farm staff already work long hours. Ground-nesting birds and other creatures may also be put at risk.</p> <p>The implementation of Proposal 4, at a farm level, is beset by a great deal of time-consuming bureaucracy, which we would like to see addressed.</p>	<p>Noted. See Agency's response under Chapter 2.2.3.</p> <p>Noted. The Agency is aware of the health and safety implications of night-time irrigation and takes them fully into account.</p> <p>The administration processes for licence applications will be included in the Government's review of the abstraction legislation.</p>

Consultee (Date)	Comment	Response
Essex & Suffolk Water (4/4/00)	It needs to be reinforced up front that the issue of demand exceeding resources is not just confined to the LEAP area, since the area's resources are used to supply other areas in the region. We particularly support proposals 1 and 4, which are most relevant to our own situation. We lead the industry in terms of demand management and water efficiency measures. We are pleased to see the Agency's commitment to the principle of redistribution from areas of surplus to areas of deficit. We are committed to monitoring for any potential environmental effects of the Denver variation.	Noted. Noted.

ISSUE 2 A BETTER UNDERSTANDING OF THE WATER BALANCE OF THE LEAP AREA IS REQUIRED

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	All three proposals are concerned either with formulating strategies or monitoring and review – there appears to be very little in the form of action and implementation.	The groundwater modelling strategy will involve extensive data collection in the first instance; the other two reviews are essential to assist with this. Issues 2 and 3 are primarily strategic and will lead to action and implementation as shown in Issue 4.
Norfolk County Council (14/3/00)	Proposal 1 must be followed, and proposals 2 and 3 are also supported.	Noted.
East Anglian Waterways Association Ltd (21/3/00)	We fully support the proposed groundwater investigation, as this will provide an important building block on which to base future policy and will impact on Issues 3 & 4, both of which we support.	Noted.
Norfolk Wildlife Trust (27/3/00)	We support all positive proposals (1-3). It is important that any groundwater model is able to incorporate climate change and the likely implications for water availability.	The model will take account of different recharge scenarios for future resource assessments.
The Inland Waterways Association (Head Office) (30/3/00)	We fully support the proposed development of a groundwater investigation. This will complement the successful implementation of Issues 3 & 4, both of which we support.	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	We warmly welcome the proposal to develop a groundwater investigation and modelling strategy and are aware that work has already begun. We consider this to be crucial and wish to see it pursued as a matter of urgency as it is vital to the development plan.	The groundwater investigation and modelling strategy for the NW Norfolk LEAP area is a phased programme over four years, which will be reviewed annually. The project is planned to commence in April 2001, with completion by March 2005.
Essex & Suffolk Water (4/4/00)	We have a potential interest in Proposal 1 and would be interested in gaining a better understanding of the surface/groundwater interaction in the Cut Off Channel.	Noted.

Consultee (Date)	Comment	Response
English Nature (Norfolk) (4/4/00)	We support the statement that a better understanding of the water balance of the LEAP area is required and believe that this is a fundamental under-pinning for the LEAP. However, proposal 4 ('do nothing'), whilst economically attractive, cannot benefit the sustainability of the natural environment.	Noted.

ISSUE 3 A BETTER UNDERSTANDING OF THE WATER REQUIREMENTS OF THE ENVIRONMENT AND THE IMPACTS OF ABSTRACTION IS NEEDED

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	There is a need for more positive action and implementation in relation to this issue.	Wetland monitoring, the review of consents, AMP3 and monitoring of the significance of flows to tide <u>are</u> positive actions. Other more strategic activities will lead to more action and implementation under Issue 4.
Norfolk County Council (14/3/00)	All proposals are supported strongly apart from 'do nothing'.	Noted.
The Inland Waterways Association (Cambs branch) (17/3/00)	Proposal 6: IWA is glad that this involvement will continue. It seems essential if good flood protection and navigation are to be maintained.	Noted.
Norfolk Wildlife Trust (27/3/00)	All proposals (except 'do nothing') are supported. For Proposal 2, what criteria were used to select the sites mentioned? In particular we would highlight the omission of East Winch Common SSSI. The document 'Water abstraction and SSSIs in England 1999', which lists wetland sites of concern, is an appropriate information source.	Noted. The sites are parts of candidate Special Areas of Conservation (cSACs), and the Habitats Directive requires the Agency to review consents that potentially affect them. East Winch Common SSSI is not part of a cSAC.
The Inland Waterways Association (Head Office) (30/3/00)	The Association supports the proposal to continue monitoring the environmental significance of flows to tide, particularly the flow in the Tidal River, as this improves the understanding of general river hydraulics as well as the Ely Ouse – Essex scheme.	Noted.
Councillor P Cobb (2/4/00)	I am concerned about the transfer of water from the Ouse to Essex when we do not fully understand the flow requirements to maintain optimum salinity in the Wash and what the effects on siltation might be.	The Agency is involved in monitoring the flow requirements of the Wash. In addition, the Ely Ouse-Essex transfer is subject to a requirement for a minimum residual flow to tide.
Essex & Suffolk Water (4/4/00)	Proposals 5 & 6 are inter-related and covered by the ongoing monitoring programme agreed under the terms of the Denver licence variation. When this expires in November 2002, the monitoring work will continue for the remainder of AMP3. It should be made clear that the variation is for an increase in monthly Hands Off Flow (HOF) during March and April and a decrease in the monthly HOF from October to December.	Noted. Activity tables in the LEAP will not be in the same format, but brief explanatory notes will be included.

Consultee (Date)	Comment	Response
English Nature (Norfolk) (4/4/00)	<p>We support this issue and believe that this also is a fundamental part of the LEAP.</p> <p>A further advantage of proposals 2 and 3 is sustainability. An increased knowledge of wetland sites and identification of potentially damaging abstractions will allow decisions to be made which do not undermine the quality of the natural environment.</p> <p>With regard to proposal 2, we would suggest East Winch Common SSSI for monitoring as the site is subject to drainage and abstraction impacts.</p> <p>Proposal 2: change to 'Leziate, Sugar and Derby Fens SSSI' from 'Leziate, Derby and Sugar Fen SSSI'.</p>	<p>Noted.</p> <p>Noted, but advantages and disadvantages are listed only as an aid to consultation and are not repeated in the LEAP.</p> <p>Monitoring of the Common is either a condition of licences thought to have an impact, or is currently being agreed with the Agency.</p> <p>Noted and carried forward into the LEAP.</p>

ISSUE 4**THE ALLOCATION OF THE WATER RESOURCES AND THE LICENSING POLICY REQUIRE RESTATING**

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	<p>Catchment Abstraction Management Strategies (CAMS) are viewed as important in relation to this issue – the Council would welcome more consultation.</p> <p>Local Authorities could be identified under 'other organisations' as they have a statutory role in respect of private water supplies – which are often affected by abstraction. Other bodies, e.g. RSPB, English Nature, Norfolk Wildlife Trust, should be identified where appropriate.</p>	<p>The Council was consulted during April 2000 about the process of producing CAMS. It will be consulted again when the Norfolk area CAMS is being produced.</p> <p>This column indicates the local partner responsible for implementing each action. In this case the Agency is responsible, although other organisations, such as RSPB, English Nature, etc, will be consulted.</p>
Norfolk County Council (14/3/00)	All proposals apart from 'do nothing' are supported strongly.	Noted.
Norfolk Wildlife Trust (27/3/00)	We support all positive proposals (1-4). It is important that the results of the Regional Water Strategy and the potential constraints on developing further PWS, and so future built development, is disseminated to water companies and local authority planners. This would support the key issue on page 76.	Noted.
Essex & Suffolk Water (4/4/00)	With regard to proposal 2 and the update of the Agency's Regional Water Resources Strategy, you do not make reference to the water companies' own Water Resources Plans which you will surely use to formulate the regional picture.	Updating the Regional Water Resources Strategy is an Agency responsibility, as shown. We will, as indicated, consult with others, and the water companies' Water Resource Plans will be taken into account.
English Nature (Norfolk) (4/4/00)	We fully support this statement and proposals 1-4.	Noted.

Enhancing Biodiversity

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	The Agency needs to take account of the wish of a number of organisations to create large areas of freshwater wetland, for which more water will be needed. In addition, it should be seeking to influence more appropriate land use in the floodplain. Rivers also need to be seen in the context of their floodplains, as is being done as part of the Transnational Ecological Network Project (TENP).	The Agency supports this type of initiative and is a key partner in TENP. However, it should be noted that water quantity and availability should be viewed as major constraints to proposals. Early consultation and dialogue with our Water Resources staff is essential.
East Anglian Waterways Association Ltd (21/3/00)	We are generally supportive of the measures outlined.	Noted.
Clean Rivers Trust (15/12/99)	The shellfishery is at present under pressure from overfishing, due to the use of intensive, unsustainable methods.	Noted. The Agency is aware of such concerns and is working with partners in the Wash Forum on a range of sustainability issues. However, management of the shellfishery is the statutory responsibility of the Eastern Sea Fisheries Joint Committee.

ISSUE 5 THERE IS CONCERN OVER THE IMPACT OF ENGINEERING WORKS ON RIVERINE HABITAT DIVERSITY

Consultee (Date)	Comment	Response
King's Lynn Consortium of IDBs (4/1/00)	The Consortium is working hard to set standards to reduce the impact of engineering works and routine maintenance on habitat diversity and has produced a document entitled 'Standard Maintenance Operations'. We would like the good practice set out in it to become standard procedure for all IDBs; through its implementation, we will be looking for opportunities similar to proposals 1 and 3-6 and should be included as a lead partner for these proposals.	Noted and taken forward in the LEAP.
Breckland District Council (8/3/00)	These are all well-established practices.	Noted.
GOBA (9/3/00)	Proposal 1: Although it is unlikely that this will affect mooring sites, this may need to be considered when identifying particular sites.	Noted.
Norfolk County Council (14/3/00)	All proposals are supported strongly (apart from 'do nothing').	Noted.
Norfolk Wildlife Trust (27/3/00)	We support all positive proposals (1-6) to enhance riverine habitat diversity. For Proposal 1 an additional advantage for buffer zones is to reduce siltation and water pollution. We would encourage that such buffer zones are established alongside ditches and tributaries as well as larger rivers.	Noted.

Consultee (Date)	Comment	Response
The Inland Waterways Association (Head Office) (30/3/00)	We are generally supportive of the measures outlined.	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	Members report that sheet-piling alongside rivers such as the Wissey has a devastating effect on mammals and other creatures living alongside the riverbanks.	Potential environmental impacts are taken into account when piling is used to prevent erosion of flood defences. The top of the pile is back-filled with fibre rolls containing plants such as reeds that will recreate a conservation margin at the water edge.
English Nature (Beds, Cambs & Northants) (6/4/00)	The EU LIFE environmental project 'Wise use of floodplains' would appear to contribute to Proposal 5 (Restore flooding to natural floodplains).	Noted and taken forward.

ISSUE 6 THERE IS A NEED TO ASSESS AND, WHERE APPROPRIATE, PROTECT THE ECOLOGICAL STATUS OF HEADWATERS

Consultee (Date)	Comment	Response
King's Lynn Consortium of IDBs (4/1/00)	Although the Agency has a responsibility to protect the ecological status of headwaters, many smaller watercourses are IDB-managed (e.g. the Upper Nar and the Gaywood River). The Boards also have a duty to further conservation through their work and we would like to see the responsibility we have towards headwater conservation specifically mentioned in the text. We would also be pleased to be involved in any future work on headwaters.	Noted and taken forward.
Westacre Estate (7/2/00)	I note that 'the Agency has a lead role in protecting chalk rivers etc'. From what I know of the Agency's response in connection with a planning application for a rubbish dump in the Nar Valley at Lexham, it failed to take such a lead.	One of our roles under the UK Biodiversity Action Plan is to act as contact point for chalk rivers and 12 species of aquatic animals and plants, including otters and water voles. Current practice is that planning permission (issued by Local Planning Authorities) is usually obtained in advance of a waste management licence (issued by the Agency). The case of the West Lexham landfill proposal highlighted the need for closer collaboration, to ensure that Environmental Impact Assessments address both sets of issues at the same time. These local concerns have been fed up to national policy makers and are being acted upon.
Breckland District Council (8/3/00)	It would be useful to have a timescale attached to the survey and strategy proposed. Options involving the natural reinstatement of headwaters should be investigated, including the removal of land from agriculture and its restoration to reed-beds.	We will indicate approximate timescales for all activities in the LEAP. These two will be addressed on completion of the BAP process for Norfolk, under 'Chalk Rivers'. Noted, but this will form part of our investigations under Proposal 2.

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	All proposals are supported strongly apart from 'do nothing'.	Noted.
Norfolk Wildlife Trust (27/3/00)	We fully support all positive proposals (1,2) that lead to a better knowledge of the ecological status of headwaters. Headwaters of rivers are coming under increasing pressure as winter surface water abstraction becomes more prevalent. Consequently such knowledge is important in safeguarding their nature conservation interest.	Noted.
English Nature (Norfolk) (4/4/00)	With the increasing recognition of the environmental importance of headwaters, it is essential that a detailed knowledge of their ecological status is obtained. We wish to see BAP species targets linked to this issue in order to prioritise strategies for headwater protection and achieve maximum benefit.	Noted and taken forward.

ISSUE 7**BAP TARGETS SPECIFIC TO THE LEAP AREA ARE UNKNOWN**

Consultee (Date)	Comment	Response
King's Lynn Consortium of IDBs (4/1/00)	The Consortium is a member of the Norfolk BAP Waterbodies Topic Group and should be listed as a lead partner.	Noted and taken forward.
Breckland District Council (8/3/00)	Proposal 1 is supported.	Noted.
Norfolk County Council (14/3/00)	All proposals are supported strongly, apart from 'do nothing'. Perhaps proposal 1 could mention the Waterbodies Steering Group, set up as part of the Norfolk Biodiversity Steering Group work?	Noted. All major members of the Waterbodies Steering Group are included as partners.
Norfolk Wildlife Trust (27/3/00)	We fully support proposal 1. The Agency's 'National Action Plan for Conservation' has a target to include all BAP targets in LEAPs by 2000, therefore it is important that this issue is progressed within this document.	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	Landowners must be included as partners in developing biodiversity action plan targets. Indeed, such targets will be meaningless without their co-operation.	Noted and taken forward.
English Nature (Norfolk) (4/4/00)	We feel that there is a need for specific targets regarding BAP habitats, and species need to be identified. Consultation with the Norfolk Biodiversity Action Plan Steering Group should lead to the production of specific, timetabled actions.	Noted. This is addressed at present in the relevant county BAPs; development of Agency-specific targets will be a future commitment in agreement with other partners.

ISSUE 8 THERE IS A NEED TO REASSESS THE MOWING REGIME OF RIVER BANKS TO MINIMISE DISTURBANCE TO WILDLIFE

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	The Council is happy to be identified as a Lead Partner, but is unsure who in the Council would act as a consultee on this issue.	Noted.
Norfolk County Council (14/3/00)	All proposals apart from 'do nothing' are supported strongly.	Noted.
The Inland Waterways Association (Cambs branch) (17/3/00)	This issue can affect mooring of boats at some points; are all moorings part of the 1 July deadline, or can specified, i.e. agreed, moorings be exempt? There should be discussions with boating interests.	Moorings, locks and other operational sites have been and will continue to be cut before 1 July for Health and Safety purposes. This will be formalised in the grass cutting policy.
Country Landowners' Association (Norfolk) (2/4/00)	We understand the requirement to mow riverbanks at certain times, but are conscious of the adverse effect this has on wildlife. The mowing regime should be reduced significantly, possibly down to a three-year cycle or, if this is not possible, to alternate sides each year as recommended by the Countryside Stewardship Scheme. Mowing on the Nar is particularly damaging to wildlife.	Noted. The Agency continually strives to ensure that all interests, including the environmental impacts, are considered. This protocol will be reviewed on a regular basis to take account of experience and the views of other parties.
English Nature (Beds, Cambs & Northants) (6/4/00)	We fully endorse Proposal 1. This should ensure the maintenance of habitat value to wildlife and prevent the destruction of birds, their nests and young and thus prevent any contravention of the Wildlife & Countryside Act. No mention is made of the recent legislation protecting habitat used by water vole. It is possible that mowing could disturb water voles and damage or obstruct their holes, which would be an offence under the Act. Due account should be made of this in the LEAP.	Noted. Noted.

ISSUE 9 THERE IS A NEED TO PROTECT HABITAT OUTSIDE DESIGNATED AREAS

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	CWS are afforded protection from development in the Adopted Breckland Local Plan irrespective of size. Remove 'small undesignated' from the sentence. Norfolk Wildlife Trust is consulted by the Council on all planning applications related to CWS. Therefore they are considered in the planning process by the council. An additional proposal could be the identification of buffers and link habitats in order to protect them from agriculture.	Noted. However, this introductory text was included only as an aid to consultation and will not be repeated in the LEAP. Noted. A proposal to identify opportunities for habitat creation has been included in the LEAP.

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	It is pleasing to see this recognised – all proposals are supported (except 'do nothing'). Maybe the proposed survey work is less important than attempts to create more basic new habitats, additional wet areas, ponds and tree-planting etc. It is more important that there should be plenty of such work rather than that it is located in particular places.	Noted and taken forward into the LEAP.
Norfolk Wildlife Trust (27/3/00)	We fully support proposals 1&2. The importance of the wider countryside is recognised in the Habitats Directive. It is essential that we avoid having key protected nature conservation sites isolated within a degraded wider environment. We need a vision of the landscape we wish to create to ensure that nature conservation will be sustainable. A clue can be obtained from that which existed prior to drainage, abstraction and land improvement. We also need a baseline to be set to ensure that there is no deterioration.	Noted.

ISSUE 10 THERE IS CONCERN OVER THE IMPACT OF RIVER STRUCTURES ON SEA TROUT POPULATIONS IN THE RIVERS NAR AND BABINGLEY

Consultee (Date)	Comment	Response
Sandringham Estate (16/12/99)	I would very much like the Agency to become involved in improving the river and seeing if sea trout can return to the watercourse. Any work that the Agency can do would receive our full support as the river is suffering badly in one or two places due to various unsympathetic works.	Noted.
King's Lynn Consortium of IDBs (4/1/00)	The Consortium should be identified as a lead partner in this issue.	Noted and taken forward into the LEAP.
Norfolk County Council (14/3/00)	All proposals are supported except 'do nothing'.	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	Whilst we all like to see the occasional sea trout in the Nar and Babingley we do not believe they should be specifically encouraged. There is evidence to suggest that sea trout kelts damage brown trout fry and spawn. We would recommend that no encouragement should be given to sea trout to travel above Narborough Mill.	For sea trout returning to the sea following spawning, most feeding and weight gain occur once they are back in the more productive saltwater environment. Sea trout kelt predation on resident trout would therefore be minimal.
English Nature (Norfolk) (4/4/00)	With regard to proposal 3, we would suggest that the Upper Nar IDB is added to the lead partners list.	Noted and taken forward in the LEAP.

ISSUE 11 THERE ARE PROBLEMS WITH FISH BEING PUMPED OUT OF THE MIDDLE LEVEL SYSTEM DURING TIMES OF HIGH FLOWS

Consultee (Date)	Comment	Response
Middle Level Commissioners (14/1/00)	<p>The Commissioners are surprised at the way this issue has been raised and the importance ascribed to it; it is also a flood defence issue and should be treated as such. If implemented, proposal 1 would lead to an increased flood risk for land and property in the Middle Level. This is unacceptable. Action has already been taken with respect to Proposal 2. Where appropriate, further measures will be taken.</p> <p>It is noteworthy that, in local LEAPs, the Agency does not consider fish kills at its own or other pumping stations worthy of issue status. Chapter 2 confirms that the Main Drain supports a 'good Class B fishery'.</p>	<p>Noted.</p> <p>This issue was raised by Stakeholders during the LEAP formulation process, and its priority rating was determined by members of that group. All issues in the Draft LEAP are subject to review through the consultation process.</p>
Norfolk County Council (14/3/00)	All the proposals are supported except 'do nothing'.	Noted.

ISSUE 12 THERE IS AN ABSENCE OF GRAYLING IN THE RIVER NAR

Consultee (Date)	Comment	Response
Dr R B Rickards (14/12/99)	I wouldn't have any problems with putting grayling in, but I would not like to see some vague historical reason dredged up as an excuse for this. Also, if anglers are to be discouraged from moving fish around, the Agency should be seen to be whiter than white. This is not really an issue, lets drop it.	An investigation into the historical existence of grayling in the Nar, involving communication with the Grayling Society and letters to local landowners and fisheries interests, has failed to discover any grayling records.
Clean Rivers Trust (15/12/99)	Grayling have not been known in the Nar to any of the Trust's supporters in the last century.	The Agency will not, therefore, consent any introduction of grayling into this watercourse.
Country Landowners' Association (Norfolk) (2/4/00)	A stocking policy to include grayling in the Nar should be approached with caution. We suspect that there may never have been grayling in the Nar and that it would be wrong to introduce them if it were the case. It is doubtful if the trout population could readily absorb the competition for food which grayling would introduce.	An investigation into the historical existence of grayling in the Nar, involving communication with the Grayling Society and letters to local landowners and fisheries interests, has failed to discover any grayling records.
English Nature (Norfolk) (4/4/00)	English Nature should be added to the list of lead partners. We remind those involved that consent under Section 28 of the Wildlife & Countryside Act (1981) as amended would be required.	The Agency will not, therefore, consent any introduction of grayling into this watercourse.

Enjoyment of the Waterways

Consultee (Date)	Comment	Response
British Canoe Union (28/3/00)	The BCU urges you to include polices in your plan whereby you will actively encourage the making of agreements to enable canoeing to take place on physically-canoeable waterways.	Noted and taken forward. Having assessed the fisheries and conservation implications, the Agency would, where appropriate, be prepared to assist with access negotiations for canoeing.
Mr P R Clarke (20/3/00)	<p>I would like to comment on two points:</p> <p>1) I wish to complain about the lack of dog control on Norfolk beaches and the dog ban that has been imposed by some councils. This ban has concentrated dog owners onto the more secluded, wildlife-rich beaches, which are becoming a grave health risk. How long will it be before there is another <i>E.coli</i> case similar to the one in Devon? Councils should consider this and make a complete ban of all dogs on beaches.</p> <p>2) Traffic along the A149 has increased enormously in the last 15 years, with 10-wheeled lorries crunching roadside verges up to 2 ft from the tarmac. The increase in holiday traffic creates hazards for walkers, cyclists and wildlife. Before there are more human fatalities the speed limit should be 30 mph everywhere and 20 mph in villages.</p>	Noted. As these matters are outside of the Agency's remit, they are being dealt with by the Environmental Health Department at King's Lynn & West Norfolk Borough Council.

ISSUE 13**THERE IS A NEED TO IMPROVE RECREATIONAL AND NAVIGATION ACCESS TO AGENCY-OWNED LAND ON THE RELIEF CHANNEL AND CUT OFF CHANNEL**

Consultee (Date)	Comment	Response
Middle Level Commissioners (14/1/00)	It is unfortunate that the Agency has decided to proceed with opening the Relief Channel to navigation, rather than promoting improvements identified as priorities by the Fens Tourism Partnership and the Fen Waterways Group. The Commissioners are therefore pleased to note that the Agency intends to continue its participation in the Fen Waterways Regeneration Project.	<p>The Relief Channel project was identified as a long-term project by the Fen Waterways Group. The availability of European funds brought the project forward.</p> <p>The Agency will continue to support the Fen Waterways Regeneration Project, subject to available funds.</p>
Norfolk & Suffolk Yachting Association (3/2/00)	We applaud the inclusion of this significant issue in the LEAP.	Noted.
GOBA (9/3/00)	<p>GOBA is the Great Ouse Boating Association, not Authority.</p> <p>The new boating facilities mentioned are not specific.</p> <p>The Relief Channel navigation is mentioned as a new/alternative route to King's Lynn, but there is no mention of a lock at the downstream end of the channel being provided later.</p>	<p>Noted. Text amended.</p> <p>The text will state that facilities include three 48-hour moorings and three water points.</p> <p>Although this is our long-term goal, it is beyond the scope of the current project.</p>

Consultee (Date)	Comment	Response
The Inland Waterways Association (Cambs branch) (17/3/00)	As part of, or subsequent to completion of, this issue, we suggest an extension of the Relief Channel to connect to a new proposed marina at the Nar Loop in King's Lynn (see comment on Chapter 2.6.2).	Consultants employed by King's Lynn & West Norfolk Borough Council are considering the proposal highlighted here. Discussions have taken place between representatives of the Agency, the consultants and the Council.
East Anglian Waterways Association Ltd (21/3/00)	<p>The Association congratulates the Agency for securing funding to open the Relief Channel to navigation from Denver to Saddlebow, but is concerned about the lack of prior consultation. Details were received third-hand and it had no reply to a letter expressing worries about aspects of the scheme, in spite of the Agency's supposed intention to communicate fully and openly. Whilst the scheme is important, Saddlebow is remote from King's Lynn and the main navigational benefit can only come when an exit can be provided. The Agency is urged to prioritise an investigation into how this could be achieved. The proposed marina on the Nar could be a possibility. Further up, the Nar runs within half a mile of the Relief Channel, with only farmland and a road between. A channel between the two could provide an exit via the marina and also improve the flood containment concerns outlined in Issue 31.</p> <p>The Association is encouraged to see the Agency's active participation in the Fen Access Project and the Fen Waterways Regeneration Project and supports the creation of trails and improved angling facilities.</p>	<p>All comments received on the Scheme have been passed to the consultants (Posford Duvivier) so that they can be dealt with in the Environmental Impact Assessment, which will respond to matters raised but which has unfortunately fallen behind schedule.</p> <p>Noted.</p>
British Canoe Union (28/3/00)	When planning waterside facilities, it is important to provide launching sites for canoes and portage routes around locks and sluices.	Noted. The Relief Channel lock will have a canoe portage to provide access for canoeists.
The Inland Waterways Association (Head Office) (30/3/00)	<p>Although we support this proposal, we are disappointed at the lack of consultation with interested groups concerning the scheme. The Agency's policy of 'being open and consulting others about our work' has not been upheld. Problems that arose as a consequence of the lock construction on the little Ouse at Brandon justify this concern.</p> <p>This significant improvement in recreational and navigation access needs a suitable exit from the channel. It could be linked with redevelopment in the Boal Quay area; the proposed non-tidal marina on the Nar will have to incorporate a lock or tide gate. Linking the Relief Channel and the River Nar could alleviate flooding concerns (see issue 31), with water being diverted via the exit sluice.</p>	<p>Funding for this project was obtained prior to consultation. However, this was made necessary by the short timescale available for obtaining Objective 5b funding. All interested parties have been consulted and updated.</p> <p>Consultants employed by King's Lynn & West Norfolk Borough Council are considering the proposal highlighted here. Discussions have taken place between representatives of the Agency, the consultants and the Council.</p>

Consultee (Date)	Comment	Response
The Inland Waterways Association (Head Office) (30/3/00) continued	We are pleased to note the Agency's active participation in the Fen Access Project and the Fen Waterways Regeneration Project and support their aims to improve recreational facilities and walkways for public use.	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	We wish to see landowners included amongst the lead partners. Increased access implies increased facilities, parking and liability. This would require funding.	Noted.
Essex & Suffolk Water (4/4/00)	Proposal 1 has implications for monitoring and mitigation works required under the Denver Licence Variation. We ask the Agency to commit to keeping in close contact with us regarding the implementation and timing of any of these proposals in order to aid the investigative process and avoid duplication of work.	We agree with this statement and this will be addressed by liaison with the internal monitoring team and the Environmental Impact Assessment shortly to be published for consultation.

Managing Waste

ISSUE 14 THERE IS CONCERN OVER ENVIRONMENTAL IMPACTS OF BLACKBOROUGH END WASTE MANAGEMENT SITES

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	Norfolk County Council, as the Waste Disposal Authority, should be identified as a Lead Partner – Breckland Council does not have a role in this respect.	Noted.

Risks to Water Quality

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	Deemed consents of both the local authority and Ministry of Defence STWs are likely sources of problems for the River Nar and other watercourses; the West Acre STW oozes slime into a ditch leading to the Nar at times. The Marham water treatment facility belonging to Anglian Water discharges concentrated 'cleanings' or concentrate to the River Nar. North Lynn Drains: The Agency has prosecuted Omex re pollution of the drain through St Edmund's school but has usually not responded to frequent pollution notifications by the school's headmaster and caretaker. This is poor practice and needs to be not repeated.	RAF Marham and West Acre STWs are currently compliant with their consents to discharge. The latter discharges via a soakaway. We are not aware of any specific problems associated with this discharge but will investigate it. Marham WTW is consented to discharge to the Polver Drain, which is a tributary of the River Nar. The discharge is routinely monitored to assess compliance against the consent to discharge. The Agency has responded to all reports of pollution received from St Edmund's School.
Continued...		

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99) continued	Mudflats at the mouth of the Ouse are part of the major wading bird over-wintering feeding grounds of the Wash. Biologists have observed that invertebrates (a major food source) are in decline. The most likely reason is the river discharges carrying less nutrients from the sewage works and food packing and processing industries.	Noted.
British Canoe Union (28/3/00)	We trust that the Agency will continue its work to improve water quality. Accessibility of water quality information is important for canoeists to make informed decisions, on their own responsibility, as to when and when not to go afloat.	Water quality information is available on the public register.

ISSUE 15 A NUMBER OF RIVER STRETCHES FAIL TO MEET THEIR RIVER ECOSYSTEM TARGETS

Consultee (Date)	Comment	Response
Westacre Estate (7/2/00)	I am surprised that some stretches of the River Nar fail to meet their ecosystem targets as the water looks and tastes very good; I would think your proposals miss the point. If there are problems they need to be analysed and understood and corrective measures taken. Farming systems may be some of the cause but so may STW at Castle Acre. Cannot the causes be pinpointed?	Water quality in the River Nar is good, showing little or no sign of organic enrichment. Failure to meet River Ecosystem targets is due to low levels of dissolved oxygen, associated with low flows. Nevertheless, we are committed to refining and improving water quality targets. Under the EU Habitats Directive, we are reviewing all consents issued by the Agency at designated sites to ensure that they do not adversely affect the environment. Earlier this year we consulted publicly on our proposals for the production of Catchment Abstraction Management Strategies, which will describe the licensing policy for LEAP areas.
Breckland District Council (8/3/00)	In addition to farm pollution itself, run-off from agricultural fields should also be included.	We are working with planning and highways authorities, sewerage undertakers, developers, etc, to ensure that drainage from roads and urban areas is designed in a cost effective and sustainable manner.
Country Landowners' Association (Norfolk) (2/4/00)	Other factors contribute to this problem, particularly riverbed management. In addition, damage is almost certainly caused by discharge from housing developments and large concrete areas and by abstraction. There is also concern that outfalls from small sewage works are not as clean as claimed; water quality in many ditches appears poor.	Small STWs known as 'package treatment plants' can produce good quality effluents. They normally have 'descriptive' consents that define the effluent treatment plant and require good practice in its operation and maintenance. The consent may also describe potential adverse effects that must be avoided in the receiving environment. Descriptively consented discharges are inspected annually to assess compliance; non-compliance may lead to enforcement action for a breach of consent conditions. Castle Acre STW discharges via soakaway and is compliant with the discharge consent.

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	This proposal is supported.	Noted.
English Nature (Norfolk) (4/4/00)	English Nature would wish to work closely with the Agency in addressing problems and restoring the water quality on the River Nar.	Noted.

ISSUE 16 THERE IS CONCERN OVER EUTROPHICATION OF THE GREAT OUSE ESTUARY

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	Progress on the Wash/Great Ouse Estuary work is noted with pleasure.	Noted.
Essex & Suffolk Water (4/4/00)	All proposals have implications for monitoring and mitigation works required under the Denver Licence Variation. ESW would like to be kept in close contact regarding the implementation and timing of these proposals in order to aid the investigative processes and avoid duplication of work.	We agree with this statement and this will be addressed by liaison with the internal monitoring team and the EIA shortly to be published for consultation.
English Nature (Beds, Cambs & Northants) (6/4/00)	I note the concerns expressed both in this document and the Wash LEAP. Similar concerns have been raised by EN in connection with Ouse Washes (Dr C Newbold recent paper enclosed). Poor water quality, in particular high phosphorus levels, have been identified in the River Ouse which appear to correlate with a dramatic decline in the variety of macrophyte flora recorded on the Ouse Washes. Actions are proposed in this paper as possible solutions to the problem.	A macrophyte survey on the River Delph and Counter Drain were undertaken by the Agency in 1999. These surveys showed that both the rivers contain a moderately rich and diverse macrophyte flora. In the Counter Drain there is evidence that high abundance and cover of filamentous algae may be reducing (other) macrophyte diversity and abundance.

ISSUE 17 GROUNDWATER IS VULNERABLE TO POLLUTION

Consultee (Date)	Comment	Response
Westacre Estate (7/2/00)	If nitrate levels are the only concerns regarding pollution in groundwater then I think we are very lucky. Also there is very little evidence that high nitrate levels (above 50 mg/l) are of much concern.	Nitrate levels are not the only concern regarding groundwater pollution. Targeting pollution prevention inspections and the implementation of Groundwater Regulations 1998 aim to prevent groundwater pollution arising from other pollutants and sources. The criteria for identifying NVZs are defined by the Nitrate Directive (676/91/EEC) which sets the limit. The Agency has statutory responsibility for the enforcement of the NVZ Action Programme Measures.
Breckland District Council (8/3/00)	Local Authorities should be listed under proposal 2, because of the statutory duty in respect of private water supplies.	Noted and taken forward into the LEAP.
Norfolk County Council (14/3/00)	All the proposals are supported except 'do nothing'.	Noted.

Consultee (Date)	Comment	Response
Norfolk Wildlife Trust (27/3/00)	The Trust supports all positive proposals to reduce nitrate pollution of groundwater. However, it appears to concentrate only on nitrate levels in relation to public water supply. Our concern also is for possible groundwater pollution arising from activities such as outdoor intensive animal rearing and sewage sludge disposal. Where this is taking place close to wetland nature conservation sites that are naturally nutrient poor there would appear to be the potential for eutrophication, leading to adverse ecological impacts. In particular we have concerns for Roydon Common SSSI/cSAC. There is also concern about heavy metals within sewage sludge. How are these activities controlled? How far and fast do different constituents travel? Has any assessment been undertaken as to the possible risks of pollution to groundwater and water and wetland sites?	<p>In addition to enforcing the NVZ Action Programme measures, by targeting pollution prevention inspections and the implementation of the Groundwater Regulations 1998, we aim to prevent groundwater pollution arising from other pollutants and sources.</p> <p>The application of sewage sludge to agricultural land is controlled in the UK by the Sludge (Use in Agriculture) Regulations 1989 (amended 1990). The Agency is the competent authority responsible for enforcement. The Regulations require that the average annual rate of addition of specified heavy metals and their concentration in the soil do not exceed specified limits. The complementary 'Code of Practice for Agricultural Use of Sewage Sludge', prepared by the DoE and adopted by Water Companies, recommends additional safeguards based on the best available scientific evidence.</p> <p>Outside of NVZs there are no specific controls to prevent pollution arising from intensive outdoor animal rearing. If pollution occurs or is likely to, the Agency can take action under the Water Resources Act 1991.</p>
Country Landowners' Association (Norfolk) (2/4/00)	We believe that MAFF, and the Countryside Agency as well as landowners should be amongst the lead partners.	The text in the final LEAP refers to 'responsibility', and the Countryside Agency, MAFF and landowners do not have any responsibility for the actions identified. However, the Agency welcomes pro-active promotion and adoption of best practice.

ISSUE 18**HUNSTANTON MAIN AND HEACHAM NORTH BEACHES FAIL TO MEET GUIDELINE BATHING WATER QUALITY STANDARDS**

Consultee (Date)	Comment	Response
East of England Tourist Board (4/2/00)	Recognition of the importance of bathing water quality standards at Hunstanton and Heacham is supported, as this can have a significant influence on the attractiveness of a seaside resort which, by nature, has the beach and sea as its focus. In a context where there are many beaches and resorts around the country and overseas with Blue Flag status, it is critical to the long-term competitiveness of these resorts that high standards are reached and maintained.	Noted.
Norfolk County Council (14/3/00)	All the proposals are supported except 'do nothing'.	Noted.

Consultee (Date)	Comment	Response
Anglian Water Services Ltd (29/3/00)	<p>There are two issues here, not one, i.e.</p> <ol style="list-style-type: none"> 1. Hunstanton Main Beach does not achieve the guideline standard, which is understood to be an Agency target at this location; 2. Heacham North Beach is in danger of failing the mandatory standard, with at least one sample failure in 5 out of the last 6 seasons despite UV treatment being installed at Heacham STW in 1995. <p>The title implies that the Agency's target is to achieve the guideline standard at Heacham; Anglian Water supports this aim, as this is also our target. However, correspondence with the Agency indicates an unwillingness to pursue the guideline standard at this stage, firstly because compliance with the mandatory standard is at risk, and secondly because the beach is not a Key Resort. Clarity on this issue would be appreciated.</p> <p>The 'Progress' column correctly identifies the contamination source as diffuse, from privately owned sewerage systems, but there are no survey recommendations and no action plan. What does the Agency intend to do?</p> <p>Hunstanton STW is mentioned, but this should be South Beach Road TPS.</p>	<p>This issue has been included in our North West Norfolk document for reference only as it is being addressed through the Wash LEAP.</p> <p>These comments have therefore been forwarded to the Wash LEAP Project Manager for action.</p>
Councillor P Cobb (2/4/00)	<p>Proposal 1: It might be more accurate to say that Heacham Parish Council has been successful in preventing the feral wildfowl population increasing further. Reducing it enough to stop pollution may require bylaws and prosecutions so people stop feeding them. The word 'feral' ought to be added to make it clear that the waterfowl are domestic.</p>	

ISSUE 19

THERE IS A FAILURE TO MEET ENVIRONMENTAL QUALITY STANDARDS (EQS) FOR TRIBUTYL TIN IN THE GREAT OUSE ESTUARY

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	All the proposals are supported except 'do nothing'.	Noted.

ISSUE 20

THERE IS CONCERN OVER THE IMPACT OF POOR WATER QUALITY ON THE RIVER NAR SSSI

Consultee (Date)	Comment	Response
Westacre Estate (7/2/00)	Organic enrichment, siltation and pesticide pollution obviously need to be understood and corrective action taken. However, there is no mention of possible effects from an old waste tip near Newton-by-Castle Acre. Nor is there any mention of the discharge from the Castle Acre sewage works. Most of the proposals for this issue are for monitoring, whilst very few relate to implementation of corrective measures. Maybe the Agency has no muscle in this respect?	The proposals connected with this issue have been carried out and have shown that water quality throughout the River Nar is good; failures are due to low dissolved oxygen and low flows. Discharges are compliant with their consents and unlikely to cause deterioration in the River Nar. Monitoring needed to be undertaken to assess the extent of these concerns prior to any corrective measures being implemented.
Breckland District Council (8/3/00)	Proposal 5: Countryside Stewardship is a voluntary scheme in which farmers are encouraged to participate. It is therefore not able to be 'implemented' as such.	Noted. The text has been amended in the LEAP.
Norfolk County Council (14/3/00)	All the proposals are supported except 'do nothing'.	Noted.
Norfolk Wildlife Trust (27/3/00)	It is a concern that a SSSI river is continuing to suffer from poor water quality, despite this issue being identified in the CMP. All proposals are supported (except 'do nothing').	Noted.
Country Landowners' Association (Norfolk) (2/4/00)	This is a cause for concern amongst landowners and they should be included as lead partners. As many agri-environment schemes as possible should be included under proposal 5. Members report that water quality in the lower Nar has deteriorated recently.	Noted and taken forward into the LEAP, under Activity 5. More agri-environment schemes have been listed in the comments section of this issue. The proposals within this issue have been carried out and have shown that water quality throughout the River Nar is good; failures are due to low dissolved oxygen and low flows.
English Nature (Norfolk) (4/4/00)	With regard to proposal 3, we would ask that EN are added to the list of partners. We welcome the emphasis placed on improving poor water quality on the River Nar and would wish to work closely with the Agency in supporting Proposal 3. Proposal 3 work has already been identified in the 'River Nar Conservation Strategy' (a joint Agency-English Nature document). We would suggest that the FRCA is added to the list of partners for Proposal 5.	All the proposals were identified in the River Nar Conservation Strategy and most have been completed, showing the River Nar to be of good quality. Failures are due to low dissolved oxygen and low flows. Noted and taken forward into the LEAP.

Needs for Monitoring and Further Investigation

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	Environmental issues regarding the winning of sand and gravel are not mentioned. In the past this activity has had to remediate acidic waters especially in the Leziate area. The quarries at Pentney are also of environmental significance.	This was not picked up as a major issue by the Stakeholder Group. Although our powers in connection with sand and gravel extraction are limited, the Agency is a statutory consultee for Local Planning Authorities, who issue the relevant consents. Potential environmental impacts are always taken into account when we comment on planning applications.

ISSUE 21 THERE IS CONCERN OVER THE AIR QUALITY IN NORTH LYNN

No responses on this issue

Improving Flood Defences

Consultee (Date)	Comment	Response
Government Office for the East of England (26/1/00)	Flood defence works, particularly in the inter-tidal zone, may have archaeological implications. Whilst this may be more significant for CZM than for LEAPs, it would be appropriate to acknowledge this in the discussion of estuarine development subject to tidal influence and in considering coastal defence options.	Noted. Implications for the potential archaeological resource are addressed at the EIA stage when planning flood defence works.
Norfolk County Council (14/3/00)	All the Flood Defence issues are welcomed.	Noted.
Westacre Estate (7/2/00)	I have little knowledge of the various flood defence issues but I understand that the nation may be unable to maintain all present flood defences in perpetuity. Some sort of managed realignment will have to be accepted, with flood defence strategies being based on a thorough cost-benefit analysis.	Noted.
East of Ouse, Polver & Nar IDB (3/4/00)	Regular weedcutting operations are necessary to maintain the channel conveyance performance to a high standard. This is essential to avoid high water levels impacting on and thus detrimentally affecting the standard of drainage/protection that is afforded to the low fenland areas. The Board discharges surface water to the river and it is concerned at the problems that may occur as a result of increasing siltation, which may arise from flows being controlled or diverted. The Board acknowledges that both of these matters are addressed in the LEAP, but is very concerned that the need for protection of people and property should be afforded its due respect and not overlooked when addressing other conservation issues.	Noted. Although conservation interests are taken into account with all Flood Defence issues, the need to protect people and property is paramount.

ISSUE 22 SEA DEFENCES AT SEA BANKS EAST (WOLFERTON TO SNETTISHAM) NEED RE-PROFILING

Consultee (Date)	Comment	Response
Sandringham Estate (16/12/99)	If there is any suitable material on the estate to help strengthen the sea wall, the Estate would be pleased to help.	This offer is appreciated and will be passed on to the Project Manager.
Country Landowners' Association (Norfolk) (2/4/00)	The almost certain effects of climate change add a degree of urgency to this issue.	Noted.

ISSUE 23 THERE IS CONCERN THAT TIDAL DEFENCES BETWEEN HUNSTANTON AND SNETTISHAM PROVIDE INADEQUATE PROTECTION FROM FLOODING

Consultee (Date)	Comment	Response
Councillor P Cobb (2/4/00)	The problem seems to be getting MAFF to understand the value of what is at risk. My understanding is that they have calculated the cost of replacement caravans only, and have not allowed for the costs of re-instating and connecting to mains services. MAFF also do not seem to realise the potential cost of having caravan sites out of action, as staying visitors are worth £27 a day to the local economy.	We will continue to work with MAFF on this issue.

ISSUE 24 THERE IS THE POTENTIAL FOR KING'S LYNN (SOUTH QUAY) TIDAL DEFENCES TO BE COMPROMISED

Consultee (Date)	Comment	Response
Mr C Johnston (5/3/00)	I was under the impression that the problem beneath Three Crowns House had been solved. The LEAP suggests the problem may be wider and may mean flood defences in this part of the town are ineffective. This is of great concern to me and to other householders. I am extremely worried that (a) the problem has apparently been left unsolved since the Agency first became aware of it several years ago and (b) none of the four proposals seem to solve the problem. I agree that further investigation is required to establish/confirm the extent of the problem and ask that this should be given priority and that no expense should be spared to finding an effective solution to the problem.	<p>The South Quay is mostly 'made up' ground, with many ancient and redundant services that are impossible to locate or seal. The responsibility for these services rests with the owners.</p> <p>The Agency will continue to issue appropriate flood warnings.</p>

Consultee (Date)	Comment	Response
King's Lynn & West Norfolk Borough Council (28/4/00)	<p>Correspondence has been received from concerned residents of the Queen Street/South Quay area regarding the possibility of flooding. It seems that the routes and positions of old drains in the area are unknown. Some may date back to Victorian times and have been constructed by private owners and therefore there are no records relating to them.</p> <p>However, the problem exists and I believe the Agency is responsible should flooding occur because of the drains. The proposals in the draft LEAP do not provide any answers. This problem needs some urgent attention and I would be grateful for any information on whether you are going to investigate this and when and what action may be taken.</p>	As indicated above, responsibility lies with the owners of the drains.

ISSUE 25 THERE IS CONCERN OVER THE IMPACT OF SILTATION ON FLOOD DEFENCES AND NAVIGATION IN THE TIDAL RIVER

Consultee (Date)	Comment	Response
Middle Level Commissioners (14/1/00)	While the issues extend beyond flood defence, the Commissioners consider that mention should be made of the Ouse Washes Habitats Group and the further proposals, particularly those relating to the possible narrowing of the Tidal River and the widening of the Hundred Foot River, which are presently under consideration.	Noted and taken forward into the LEAP.
GOBA (9/3/00)	Dredging is mentioned under Proposal 3 but it should be stressed that this is a priority. It is noted that this issue is ranked no 1 in the list of flood defence measures.	Major dredging of the Tidal River is not considered a long-term solution. However, localised dredging of locks and sluices is considered a priority. Denver to Salters Lode is dredged 2-3 times a year, as necessary.
Norfolk County Council (14/3/00)	Surely it is no coincidence that siltation of the river has increased over the same period (35 years) that water has been taken from the river to be exported to Essex. This factor is not mentioned. However, it does not appear that it is seen as a way of reviewing the quantity of water which is exported to Essex. It is very interesting to see how highly this issue is ranked.	Siltation is associated with the flood protection scheme and the training walls. Works for the transfer scheme were completed in 1971 after an Act of Parliament was passed in 1968. The licence that permits the transfer to Essex, and any potential impact on the Wash cSAC, will also be reviewed under the Habitats Directive Review of Consents.
The Inland Waterways Association (Cambs branch) (17/3/00)	The IWA is pleased that the matter is being pursued. The impact of siltation is felt not only on flood defences and drainage but also on navigation and on the water levels in the Ouse Washes. The Ouse Washes Habitat and Funding Project does consider this whole matter and should probably be mentioned. It is good to see that this issue ranks high in the prioritised lists.	Noted and taken forward into the LEAP.

Consultee (Date)	Comment	Response
East Anglian Waterways Association Ltd (21/3/00)	This matter needs to be reviewed with urgency. On a navigational front alone, and quite apart from the flood defence issues, the work on the Relief Channel is no substitute for action here. Hence we urge the Agency to initiate the actions proposed, including the dredging regime.	Major dredging of the Tidal River is not considered a long-term solution. However, localised dredging of locks and sluices is considered a priority. Denver to Salters Lode and the Old Bedford were dredged twice in 1999, and Denver Complex is already being utilised for desilting channels.
The Inland Waterways Association (Head Office) (30/3/00)	<p>The Association is concerned that this issue is raised only within the 'Improving Flood Defences' section, rather than 'Enjoyment of the Waterways' section.</p> <p>The introduction and most of the proposals appear to deal only with the Tidal River downstream of King's Lynn. As mentioned in Chapter 2.6.2 comments, there are major siltation problems between Denver and King's Lynn; these need tackling by installing training walls to narrow the channel and possibly also undertaking major dredging works. The LEAP should refer to the work of the Ouse Washes Habitat and Funding Project Group, which is investigating these matters.</p> <p>The IWA understands that Denver Sluice is already being operated to new arrangements that optimise the amount of freshwater discharged to tide at Denver (Proposal 5).</p>	<p>This issue was originally included under both sections, but was merged during the Stakeholder process so that more issues could be incorporated.</p> <p>Noted. The training walls referred to in proposal 2 would be between Denver and King's Lynn. The LEAP text has been amended to clarify this, and information on the Ouse Washes Habitat Protection and Funding Project has been added.</p> <p>This is correct.</p>
Downham & Stow Bardolph IDB (3/4/00)	The Tidal River between Downham West and Stowbridge forms part of the boundary with the Board's District and includes some of the worst areas of siltation. The Board recognises that this is the top-ranking Flood Defence issue and acknowledges the work already carried out by the Agency. Efforts to reduce the silt deposits have made some improvement, but are dependent on weather conditions producing sufficient river flows and are not wholly reliable. Although consultation is ongoing to identify alternative sources of funding for future work, this would seem to be a long-term objective. More urgency needs to be given to solving these problems, to benefit all river users.	Noted.
Essex & Suffolk Water (4/4/00)	Proposals 1-3 and 5 have implications for monitoring and mitigation works required under the Denver Licence Variation. ESW would like to be kept in close contact regarding the implementation and timing of these proposals in order to aid the investigative processes and avoid duplication of work.	We agree with this statement. This will be addressed by liaison with the internal monitoring team and the EIA shortly to be published for consultation.

Consultee (Date)	Comment	Response
English Nature (Beds, Cambs & Northants) (6/4/00)	Siltation in the Tidal River has been identified as a major cause of the increased spring/early summer flooding on the Ouse Washes. This issue is complicated but the effect is currently flooding in spring or early summer at a rate of once every two years. This is having serious deleterious effects on the success of breeding birds there. We would welcome every effort to reduce this flooding frequency. The 'do nothing' proposal should include this flooding problem as a disadvantage.	Noted. The Wash Rivers Outfall Siltation Strategy report results have been widely circulated. The Ouse Washes Funding Group is looking at further options and sources of funding to reduce summer flooding. Noted, but the 'do nothing' option is not taken forward into the LEAP.

ISSUE 26 WATER LEVEL MANAGEMENT PLANS (WLMPs) NEED TO BE COMPLETED

Consultee (Date)	Comment	Response
King's Lynn Consortium of IDBs (4/1/00)	Only WLMPs for international sites need to be completed by March 31 2000. For other SSSIs, the deadline is December 31 2000. We anticipate meeting the deadlines.	Noted.
Breckland District Council (8/3/00)	The Council agrees with the above statement. However, a more specific timetable for their production would be useful.	All water-dependent international sites should now have a WLMP, and all water dependant SSSIs will have a WLMP by 31 December 2000.
The Inland Waterways Association (Cambs branch) (17/3/00)	Water levels do have important effects upon boaters and navigation interests. I am surprised and disappointed that such interests are not listed as partners.	The IWA will be consulted when actions in a WLMP are likely to have an impact on navigation.
Norfolk Wildlife Trust (27/3/00)	We would suggest that this issue would be better placed within the 'Enhancing Biodiversity' section of the LEAP, as WLMPs to date have been focussed on nature conservation sites. We are fully supportive of the WLMP process, but are aware that they have made little progress in implementing improvements for nature conservation. Consequently, Proposal 2 is essential.	Noted; this has been incorporated into Issue 3 in the LEAP, which relates to the need for a better understanding of water requirements of the environment. Please note, however, that WLMPs are a high level MAFF target and will in future be led by our Flood Defence function. Noted.
The Inland Waterways Association (Head Office) (30/3/00)	MAFF procedural guide on WLMP preparation states that the body preparing the WLMP should consult all those with an interest in the area including those with recreational and sporting interests. The IWA wishes to be consulted in all cases where there is an inland waterway involved. The Association also asks to be consulted about any local BAPs or reviews of SAC authorisations that involve waterways.	Noted.
English Nature (Norfolk) (4/4/00)	English Nature would wish to see Proposal 2 undertaken in the near future. An agreed timetable will drive forward the implementation of improvements for nature conservation.	Noted.

ISSUE 27 THE FUTURE OF SNETTISHAM BEACH GROYNES NEEDS TO BE EVALUATED

Consultee (Date)	Comment	Response
Snettisham Parish Council (21/3/00)	The groynes that have been damaged during recharge work should be replaced and maintained regularly. The effectiveness of the groynes to be monitored until longer-term solutions are prepared. If the groynes are replaced and maintained, the amount of damage caused by tidal action will be reduced, as will the amount of imported material needed for re-shoring and re-profiling.	Replacement of groynes would be contrary to the Hunstanton-Snettisham Beach Strategy. However, annual maintenance is carried out as required.

ISSUE 28 THERE IS A NEED TO MEET BYE REPORT ACTIONS FOR IMPROVING FLOOD DEFENCES TO THE SPECIFIED DEADLINES

No responses on this issue

ISSUE 29 THERE IS AN INADEQUATE LEVEL OF FLOOD DEFENCE PROTECTION ON THE RIVER NAR

Consultee (Date)	Comment	Response
Dr R B Rickards (14/12/99)	The proposals recommended by the Feasibility Study fail to consider options for holding water back on the upper Nar as an alternative; small- and medium-sized constructions on the Upper Nar to impede run-off should be considered as an additional option.	The original feasibility report (December 1996) included options for two possible flood storage reservoirs, downstream of Marham Gauging Station and near West Winch. Neither was practicable but a third possibility has now been identified. It has sufficient storage volume, but its suitability for wetland creation is uncertain pending full analysis of geotechnical survey results.
Norfolk Wildlife Trust (27/3/00)	The Trust only recently became fully aware of the nature of the proposed flood defence changes on the River Nar. Although an approach that would have had potential nature conservation interests (washlands) was initially considered, it was rejected in favour of the present scheme. This present scheme misses an opportunity for conservation benefits through wetland habitat creation and enhancement, and we urge that a more environmentally beneficial scheme be considered.	
RSPB East Anglia Office (27/1/00)	The River Nar SSSI has a wide range of physical features and associated wildlife. The upper Nar has a variety of physical features including riffles, pools, gravel beds and meanders, whilst the lower reaches have a rich and diverse range of flora including 78 species of riverine and bankside plants. Adjacent habitats include wetland, unimproved pasture, rough fen and mature woodland, which also support a wide variety of flora and fauna. All the flood defence proposals mentioned are potentially damaging to these habitats and should therefore be mentioned as disadvantages.	Noted. A full Environmental Statement is already being prepared for consideration by more than 40 consultees, including RSPB. Advantages and disadvantages are listed in the Draft LEAP as an aid to consultation, and are not repeated in the final LEAP document.

Consultee (Date)	Comment	Response
Breckland District Council (8/3/00)	The Agency will need to ensure that measures undertaken in respect of this issue will not conflict with those under Issue 5. There are likely to be opportunities for links to be made between the two issues and these should be utilised wherever possible.	Noted. In addition to an EIA, all bank raising works along the river would be undertaken on the landward or outward facing bank-side, not on the river side.
The Inland Waterways Association (Cambs branch) (17/3/00)	The Association has proposed that there should be a new channel to connect the River Nar to the Relief Channel. Proposal 4 could be part of the connection to the new marina.	King's Lynn & West Norfolk BC has had preliminary discussions with us about extending navigation, via a new channel, between the River Nar and Relief Channel, though timescales could be protracted. River Nar improvements will begin construction by 31 March 2001, but will not compromise any future navigation link.
English Nature (Norfolk) (4/4/00)	We would stress the need for the Environmental Impact Assessment to be carried out for the proposed flood defence works for the River Nar. When completed, it should be consulted upon and implemented. English Nature wishes to be actively involved in the process.	Noted. A full Environmental Statement is already being prepared for consideration by more than 40 consultees, including English Nature.

ISSUE 30

THE USE OF MANAGED REALIGNMENT AS PART OF THE COASTAL DEFENCE STRATEGY IN THE EAST OF THE WASH NEEDS TO BE EVALUATED

Consultee (Date)	Comment	Response
RSPB East Anglia Office (27/1/00)	<p>The most suitable area for managed retreat, an area of 508 hectares back to the previous sea wall between West Lynn and Wolferton Creek, has no residential or recreational areas and was only reclaimed in the last 50 years. The loss of residential and recreational areas to managed retreat in this area is therefore very unlikely and should not be mentioned as a disadvantage.</p> <p>We would like to see the creation or expansion of salt-marsh habitat as a priority method of the coastal defence strategy.</p>	<p>Noted. This area would be included in the evaluation. However, as the Proposal is not site specific it was appropriate to include both advantages and disadvantages. Both are listed in the Draft LEAP as an aid to consultation; they are not repeated in the final LEAP document.</p> <p>Noted. This is one of the advantages of Proposal 4.</p>
Norfolk County Council (14/3/00)	The raising of this issue is welcomed.	Noted.
Norfolk Wildlife Trust (27/3/00)	Although the text for this issue identifies that for Wash SMP units 6 and 8 managed retreat is ruled out as an option for at least the next five years, we need to have a longer-term perspective (50-100 years) when considering the impacts of climate change. Similarly, any possible retreat scheme is likely to take a long time to plan and implement and so also requires a long-term vision. We support proposals 1-4 but believe that they should cover the whole Wash frontage in the LEAP area.	Noted.

Consultee (Date)	Comment	Response
Country Landowners' Association (Norfolk) (2/4/00)	Where a deliberate policy of managed realignment causes loss of land assets to landowners, compensation must be considered.	Noted.

ISSUE 31 PROPOSED DEVELOPMENT BEHIND RIVER NAR FLOOD DEFENCES IS OF CONCERN BECAUSE OF INSUFFICIENT FLOOD PROTECTION

Consultee (Date)	Comment	Response
Dr R B Rickards (14/12/99)	The proposals recommended by the Feasibility Study fail to consider options for holding water back on the upper Nar as an alternative; small- and medium-sized constructions on the upper Nar to impede run-off should be considered as an additional option.	The original feasibility report (December 1996) included options for two possible flood storage reservoirs, downstream of Marham Gauging Station and near West Winch. Neither was practicable but a third possibility has now been identified. It has sufficient storage volume, but its suitability for wetland creation is uncertain pending full analysis of geotechnical survey results.
Norfolk Wildlife Trust (27/3/00)	The solution to this issue should be integrated with Issue 29.	
Government Office for the East of England (26/1/00)	The concerns raised under this issue relating to housing and employment development allocations in the River Nar corridor would appropriately be explored through the Local Plan consultation and inquiry process.	Noted. The Agency endeavours to address this issue in development plan consultations.
English Nature (Norfolk) (4/4/00)	Regarding Proposal 1, the 'required standard' should not lead to any further degradation or loss of semi-natural habitats in the Nar floodplain. We suggest that development of the floodplain is inappropriate and that development pressure would further straightjacket the lower Nar.	In accordance with the principles of sustainable development we will advise local authorities to use their planning powers to ensure that watercourses and floodplains can fulfil their principal functions while contributing beneficially to the environment.

Chapter 4 – A Better Environment Through Partnership

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	The commitment to achieving more, incorporating both LA21 and Biodiversity Action Plans, is strongly welcomed.	Noted.
	Agriculture is the main influence on land use, and local authorities only determine development – this needs to be recognised by all relevant environmental partnerships. The Agency's wish to work within such partnerships is welcomed.	Noted.

4.1 Strategic Environmental Issues

THEME 1 ADDRESSING CLIMATE CHANGE

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	<p>It is pleasing to note that the Agency recognises its own responsibility in respect of reducing fossil fuel consumption.</p> <p>The Agency should be promoting EMAS, if not already doing so.</p> <p>The key issue should be to avoid making the situation worse as a result of our own actions.</p>	<p>Noted.</p> <p>Nationally, the Agency is looking to have ISO 14001 accreditation. The Brampton site is one of those that have already been successful in achieving this.</p> <p>The key issue is about ensuring the Agency will have the best options in place for dealing with the consequences of climate change.</p>
Norfolk Wildlife Trust (27/3/00)	The possible threats and opportunities for nature conservation are important issues when considering climate change in relation to flood defences and water resources. For example, setting back flood defences along rivers to accommodate higher fluvial flows gives opportunities for wetland habitat creation. This also links with the Key Issue addressing Source Control in Theme 7.	Noted. All flood defence capital schemes are subject to EIA. Each engineering and environmental appraisal assesses options and potential impacts for nature conservation. This includes the assessment of opportunities for wetland habitat creation through setting back flood banks.
Country Landowners' Association (Norfolk) (2/4/00)	We welcome the importance attached to addressing climate change, as sea level rise will have an enormous effect in this area. However, it would also create a number of other problems for farmers and is likely to impact to a great extent on farming techniques and crops grown.	Noted.

THEME 2 REGULATING MAJOR INDUSTRIES

Consultee (Date)	Comment	Response
The Norfolk Society (West Norfolk Branch) (30/3/00)	We are pleased to read of the implementation of the Integrated Pollution Prevention and Control Act (IPPC) 1999.	Noted.

THEME 3 IMPROVING AIR QUALITY

No responses on this theme.

THEME 4 MANAGING WASTE

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	There is no mention of the licensed liquid waste disposal site at Chalk Farm, Narborough, nor of monitoring waste transfer sites (such as Glazewing at West Dereham). The report notes that there are two landfill sites, but the consultee list shows eight landfill site managers.	The licensed site at Chalk Farm is not operational; landspreading activities carried out at the site are exempt from waste management licensing. Licensed waste transfer sites are inspected regularly by the Agency. We are not aware of any specific issues associated with these sites. There are two landfill <i>complexes</i> .
Norfolk Wildlife Trust (27/3/00)	From our experience the strategy set out by the DETR guidance on the disposal of household asbestos cement waste is not working. We suspect that because of ignorance of the collection arrangements, asbestos is being dumped on private land including our own nature reserves. From that point on we as landowners have the onerous responsibility for proper disposal. We suggest that the collection arrangements are properly advertised.	It is the Local Authority's responsibility to collect this waste, provide appropriate facilities and arrange for its disposal. Whilst the Agency will urge Local Authorities to fulfil their duties, we are not responsible for advertising them.

THEME 5 MANAGING OUR WATER RESOURCES

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	The expression 'proper use' in the Key Issue begs an awful lot of questions. Inevitably this is a bidding process between competing needs and it is not easy to determine satisfactorily. The importance of the local environment has not been well considered in the past, but it does seem to be better favoured now. New habitat areas are still needed in the Wash to replace past losses, as well as losses that will result as a result of future schemes.	The environmental need for water is already taken into account in our policies; we constantly strive to achieve the correct balance between human and environmental needs. We hope that the issues and activities in this LEAP will assist us in continuing to do this.

THEME 6 DELIVERING INTEGRATED RIVER BASIN MANAGEMENT

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	The River Nar was navigable to Narborough, and the Acts regarding navigation rights may not have been repealed.	The Anglian Water Authority Act 1977 details the statutory navigations in respect of which the Agency has inherited navigation authority. The River Nar is not included in these.
East of England Tourist Board (4/2/00)	Recognition of partnership in recreation and tourism is welcomed. The Board is hoping to run a number of initiatives over the next three years to encourage tourism businesses to adopt sustainable business practices. Once funding has been confirmed, the Board will be keen to look for additional partners to support the implementation of these projects.	Noted.

Consultee (Date)	Comment	Response
The Inland Waterways Association (Cambs branch) (17/3/00)	<p>A great deal is printed about the development of the Relief Channel for Navigation, but we have doubts about the success of the proposed scheme:</p> <p>a) We understand that it will be a buoyed channel with mooring access only at mooring points; we believe this will inhibit many boaters.</p> <p>b) In the original proposal, the nearest mooring point to King's Lynn is at Wiggshall St Mary Magdalen, over 8km from Boal Quay in King's Lynn. A nearer mooring at the Sluice (2.5km) or at Saddle Bow Bridge (4.1km) is being considered, but there are dangers with both should flood conditions arise.</p> <p>We also believe the distances from King's Lynn will deter visitors. Hence our suggestion that a navigable channel into a marina in the Nar Loop would be an asset.</p> <p>Along with considerations of an alternative route for boaters to King's Lynn we feel that the statutory route along the Tidal River is still the more important route and that the problems of siltation <u>must</u> be solved, which would also help with the clearance of floodwaters.</p>	<p>Although sluices and underwater obstacles will be buoyed, the Relief Channel will not be a buoyed channel.</p> <p>Current finances only allow three 48-hour moorings in the Relief Channel. These will be added to as future funding becomes available. A mooring at Saddle Bow was beyond the scope of the current project because it is outside of the Objective 5b funding area.</p> <p>The Nar Loop is being considered in King's Lynn & West Norfolk Borough Council's feasibility study.</p> <p>The Tidal River is still the statutory navigation and standards of maintenance will not be affected by the construction of the Relief Channel lock.</p>
Anglian Water Services Ltd (29/3/00)	Ongoing first-time sewerage applications, assessments or projects are at Ringstead, Walpole St Peter, Walpole St Andrew, Stowbridge and Wretton.	Noted and taken forward into the LEAP.
The Inland Waterways Association (Head Office) (30/3/00)	IWA considers that the second sentence should read 'However, the serious siltation in the Tidal River, particularly near Stowbridge, coupled with the strong tides and shifting silt banks, makes navigation very difficult'. Creation of a flood Relief Channel is welcomed but not an alternative to restoring the statutory conditions in the Tidal River.	Noted. The Tidal River is still the statutory navigation and standards of maintenance will not be compromised.

Theme 7 Conserving the Land

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	<p>Contaminated land issues are taking up much preparatory time for when the relevant section of the Environment Act 1995 is enacted. In South Lynn, the 'Muckworks', Harding's Pits and the gas works are but a few sites that are part of the regeneration plan for the area. Other sites of concern are Dodman's boiler works, Dow Chemicals and the area affected by the explosion in the 1970s, and North Lynn historic petroleum works which are now derelict. The oil shale retorts site at Setchey is also a significant concern.</p> <p>Environmental issues regarding sand and gravel extraction are not mentioned; in the past, it has been necessary to remediate acidic waters, especially in the Leziate area. The quarries at Pentney are also significant</p>	<p>Part IIA of the Environment Protection Act 1990, as inserted into the Environment Act 1995 by Section 57, is now in force. This alone may not address all of the land contamination issues in the area. Any land contamination that may fall within the Part IIA regime will have to go through the necessary procedures associated with that regime i.e. identification and determination of such land by the local authority (principal Regulator) in whose area it is present. If there is significant evidence that Part IIA contaminated land may also be designated as a special site, the Agency will take over the regulatory responsibility from the relevant local authority and assume the role of principal Regulator.</p> <p>This was not picked up as a major issue by the Stakeholder Group. Our powers in connection with sand and gravel extraction are limited, but the Agency is a statutory consultee for Local Planning Authorities, who issue the relevant consents. Potential environmental impacts are always taken into account when we comment on planning applications.</p>
Breckland District Council (8/3/00)	<p>Local Planning Authorities generally can only regulate land use change that requires planning permission – agricultural changes are often outside their sphere of influence.</p> <p>Figure 4.3: The Agency's comments would initially be required at Issues Paper stage and thereafter at 1st and 2nd Deposit and Proposed Modifications stages. It is unlikely that the Agency would be requested to comment prior to the publication of the Issues Paper.</p> <p>Table 4.1: The Breckland District Local Plan was adopted in September 1999 and the Norfolk County Structure Plan was adopted in October 1999.</p>	<p>Noted.</p> <p>The Agency is formally involved in the development plan process at the 'issue paper' stage. However, the Agency has been and would encourage being approached at the earliest stage to facilitate the early consideration of environmental issues when preparing and reviewing development plans.</p> <p>Noted and taken forward into the LEAP.</p>
Norfolk County Council (14/3/00)	<p>The commitment to work closer with LPAs to achieve more of the Agency's aims is welcomed. For example, the Agency needs to be able to tell the LAs whether or not water is available for proposed development schemes, and the LAs need to be able to rely on the information given to them. In the past 10 years, the LAs have not always been given accurate information. By the same token LAs should not allow development in inappropriate areas in relation to water resource, e.g. in floodplains.</p>	<p>Noted.</p>

THEME 8 MANAGING OUR FRESHWATER FISHERIES

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	There is no mention of the fish farming industry on the Nar, including West Acre and Narborough fish farms. The environmental impacts can be severe, including the introduction of alien species and nutrient-loading hikes.	The presence of these fish farms is acknowledged in the Norfolk Environmental Overview Supplement (January 2000), which includes more detailed information about the local environment.

THEME 9 ENHANCING BIODIVERSITY

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	Might reference be made to the possibility of carrying out work on a more local scale than the county biodiversity plans? Possibly relating to certain floodplain farms or other relevant local sites. This work could be supported by the relevant Biodiversity Co-ordinators. In Norfolk, the Biodiversity Steering Group hopes to appoint such a co-ordinator in the near future. The Agency makes a valuable contribution to the biodiversity process in Norfolk.	The Agency is committed to addressing the Biodiversity Action Planning process with all its partners and will contribute fully to work on the ground, as agreed through the relevant plan. One of the activities carried forward into the LEAP commits us to consultation with BAP partners and plan leaders to determine the feasibility of setting BAP targets specific to the local area.
Norfolk Wildlife Trust (27/3/00)	It would be helpful to have the status of all WLMPs within the LEAP area listed in Table 4.2.	There are only two sites that require WLMPs within the LEAP area; their status will be updated in the LEAP.
The Hawk and Owl Trust (4/5/00)	The Trust has been working in partnership with the Agency's Regions on extensive schemes to conserve Barn Owls and Kestrels. It is very aware of its role in the UK's strategy for biodiversity in that owls and other birds of prey are key indicator species of the health and wealth of the environment. North West Norfolk is an important stronghold for the UK's Barn Owl population and the Trust has undertaken extensive conservation work to maintain this. We would be grateful if this could be taken into consideration when drawing up the Action Plan	Noted and taken forward into the LEAP.

4.2 Local Agenda 21 and Biodiversity Action Plans

Consultee (Date)	Comment	Response
Norfolk County Council (14/3/00)	Table 4.3: North Norfolk and Breckland District Councils have been partners within the biodiversity process in the county of Norfolk for sometime and should be included in the partners list. More recently the Broads Authority has become involved and the Norwich City Council is about to become involved. It is hoped that, in due course, all of the district councils in Norfolk will become involved.	Noted and taken forward in the LEAP.

4.3 Education and Awareness

No comments received.

Chapter 5 – Next Steps

No comments received.

Appendices

Consultee (Date)	Comment	Response
Clean Rivers Trust (15/12/99)	No mention is made of the 'Drainage Act 1994' regarding IDBs' environmental responsibilities.	The purpose of Appendix A is to detail the duties, powers and interests of the Agency.
Breckland District Council (8/3/00)	Appendix C: The Glossary does not contain a definition of a Local Plan. Such a definition could read: <i>Statutory documents produced by District or Borough Councils containing detailed policies and proposals for development over a 10-15 year timescale.</i>	Noted and taken forward into the LEAP.
Middle Level Commissioners (14/1/00)	Appendix C: The definition of IDBs is out of date. A more accurate definition is given in the Bedford Ouse (Lower Reaches) LEAP.	Noted and taken forward into the LEAP.

6.0 NEXT STEPS

This Statement of Consultation has been distributed to all the Consultees who responded to the Draft LEAP and all members of the Area Environment Group.

Having taken into account all of the responses, we are now finalising the North West Norfolk LEAP, which will contain a five year plan of action for the area. The plan will be monitored and reviewed each year, and the results will be published in Annual Reviews. The whole process will be reviewed after five years.

We are grateful to all those who have participated in the LEAPs process for North West Norfolk.

APPENDIX 1: LIST OF RESPONDENTS

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

Anglian Water Services Ltd
Breckland Council
British Canoe Union
Clean Rivers Trust
Councillor Paul Cobb, King's Lynn & West Norfolk Borough Council
Country Landowners Association (Norfolk Branch)
Countryside Agency
Downham & Stow Bardolph Internal Drainage Board
East of England Tourist Board
East of Ouse Polver & Nar Internal Drainage Board
English Heritage
English Nature (Bedfordshire, Cambridgeshire, Northamptonshire Team)
English Nature (Norfolk Team)
Essex & Suffolk Water
Fenland District Council
Government Office for the East of England (GO-East)
Great Ouse Boating Association Ltd
Hawk and Owl Trust
King's Lynn & West Norfolk Borough Council (Environmental Health)
King's Lynn Consortium of Internal Drainage Boards
Middle Level Commissioners
Mr P R Clarke
Mr C Johnston
Norfolk & Suffolk Yachting Association
Norfolk County Council (Planning & Transportation)
Norfolk Wildlife Trust
Sandringham Estate
Snettisham Parish Council
Sport England
The East Anglian Waterways Association Ltd
The Inland Waterways Association (Cambridge Branch)
The Inland Waterways Association (Head Office)
The Norfolk Society (CPRE)
The Royal Society for the Protection of Birds
Westacre Estate

APPENDIX 2: ABBREVIATIONS

AEG	Area Environment Group
AMP	Asset Management Plan
BAP	Biodiversity Action Plan
BC	Borough Council
BCU	British Canoe Union
Beds	Bedfordshire
Cambs	Cambridgeshire
CAMS	Catchment Abstraction Management Strategy
CC	County Council
CLA	Country Landowners' Association
CMP	Catchment Management Plan
cSAC	Candidate Special Area of Conservation
CWS	County Wildlife Sites
CZM	Coastal Zone Management
DC	District Council
DETR	Department of the Environment, Transport and the Regions
DoE	Department of the Environment
EETB	East of England Tourist Board
EIA	Environmental Impact Assessment
EMAS	Environmental Management and Audit Scheme
EN	English Nature
EQS	Environmental quality standard
ESRU	Environment and Society Research Unit
ESW	Essex & Suffolk Water
EU LIFE	European Union Financial Instrument for the Environment
FRCA	Farming and Rural Conservation Agency
GDO	General Development Order
GOBA	Great Ouse Boating Association Ltd
HOF	'Hands off' flow
IDB(s)	Internal Drainage Board(s)
ISO	International Standards Organisation
IWA	Inland Waterways Association
LA	Local Authority
LEAP	Local Environment Agency Plan
LPA	Local Planning Authority
MAFF	Ministry of Agriculture, Fisheries and Food
NALMI	Norfolk Arable Land Management Initiative
NCC	Norfolk County Council
Northants	Northamptonshire
NVZ(s)	Nitrate Vulnerable Zone(s)
OFWAT	Office of Water Services
PPG	Planning Policy Guidance
PWS	Public Water Supply
R&D	Research and development
SMP	Shoreline Management Plan
SSSI	Site of Special Scientific Interest
STW	Sewage Treatment Works
TENP	Transnational Ecological Network Project
WLMP(s)	Water Level Management Plan(s)

APPENDIX 3: AEG SUB-GROUP, PROJECT TEAM AND STAKEHOLDER GROUP MEMBERSHIP

AEG Sub Group

Colin Clare
 Geoff Cave
 Brian Charlesworth
 Ingrid Floering Blackman
 John Gilbert
 David Jones

Project Team

Nigel Woonton	Area Flood Defence Manager (Project Executive)
Jackie Sprinks	LEAPs Officer (Project Co-ordinator)
Mike Atkinson	Senior Fisheries Assistant
Jeff Harrison	Flood Defence Engineer
Pauline Jones	Tactical Planning Officer
Helen McCaffery	Environment Protection Officer
Alison Whitehead	Resource Planning Officer
Pru Khimasia	Development Planning Officer

Stakeholder Group Members

Mr H Birkbeck	Westacre Estate (Farming)
Mr J Gilbert	National Farmers' Union
Mr B Charlesworth	Country Landowners' Association
Mr A Tinsley	Salmon and Trout Association
Mr K Allen	King's Lynn Angling Association
Mrs I Floering Blackman	Norfolk County Councillor
Mr J Clarke	Principal Planner, King's Lynn and West Norfolk Borough Council
Mr R Wade	Environmental Health Officer, King's Lynn & West Norfolk Borough Council
Mr D Mills	Rights of Way Officer, Norfolk County Council
Mr P Fisher	Royal Society for the Protection of Birds (RSPB)
Mr J Hiskett	Norfolk Wildlife Trust
Mr D Phillips	East of Ouse, Polver and Nar Internal Drainage Board (IDB)
Ms H Mahon	King's Lynn Consortium of IDBs
Capt J Lorking	Harbour Master, King's Lynn Conservancy Board
Ms A Billington	Anti Waste
Ms L Taylor	Anglian Water Services
Mr D Gurney	Norfolk Landscape Archaeology
Mr M Atkinson	Environment Agency
Mr C Clare	Chairman, Great Ouse Area Environment Group